

Habitats Regulation Assessment (HRA)

Screening Report

Hailsham Neighbourhood Plan Review

Pre-Regulation 14 Version

November 2025

Prepared by Wealden District Council

1. Introduction

1.1 This Habitats Regulations Assessment (HRA) screening report has been undertaken by Wealden District Council (WDC) in respect of the pre-regulation 14 draft Hailsham Neighbourhood Development Plan (NDP) Review, which has been produced by Hailsham Town Council.

1.2 The draft Hailsham NDP Review sets out a vision, objectives and policies covering a plan period up to 2042. **The Plan does not allocate sites for development.**

1.3 The vision of the draft Hailsham NDP Review is as follows:

“In 2042, Hailsham is a vibrant, attractive and sustainable town that harmoniously blends its rich heritage with modern amenities. Our community thrives on strong local connections, supported by robust infrastructure that ensures seamless mobility and access to essential services.

Hailsham is renowned for its green spaces and commitment to sustainability, with high quality parks, community food growing opportunities and eco-friendly initiatives that enhance our environment and quality of life. Our town centre is a bustling hub of independent shops, cafes, and cultural venues, offering a diverse and engaging experience for residents and visitors alike.

We prioritise the well-being of our community by providing comprehensive healthcare facilities, excellent educational institutions, and a variety of recreational opportunities. Our transport systems are efficient and well-maintained, ensuring easy access to all parts of the town, for all of our residents and visitors. A range of housing choice and opportunity has been provided, meeting the diverse needs of the population.

Hailsham is a place where people of all ages feel safe, supported, and connected. We celebrate our unique character and work together to create a future that is inclusive, prosperous, and resilient”.

1.4 The aim of this HRA screening report is to assess whether this Neighbourhood Plan would alone, or in combination with other plans and policies, cause any likely significant effects on European sites.

2. Legislation

- 2.1 Under Article 6(3) of the Habitats Directive (92/43/EEC)¹, an appropriate assessment is required, where a plan or project is likely to have a significant effect upon a European Site, either individually or ‘in combination’ with other projects. This requirement is set out in the Conservation of Habitats and Species Regulations 2017² (the “Habitats Regulations”), as amended.
- 2.2 The UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (“the Withdrawal Act”). The Withdrawal Act retains the body of existing EU-derived law within our domestic law. Recent amendments to the Habitats Regulations – the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019³ – make it clear that whilst the UK is no longer a member of the EU, a requirement for Habitats Regulation Assessment will continue.
- 2.3 The Conservation of Habitats and Species Regulations 2017 (the ‘Habitats Regulations’), transposes the Habitats Directive into UK Law. Regulation 105, provides:
- “(1) Where a land use plan – (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and (b) is not directly connected with or necessary to the management of the site the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site’s conservation objectives”*
- 2.4 This means that any proposed plan that may affect a European site (Special Area of Conservation (SAC) or Special Protection Area (SPA)) must first undergo an assessment to look at its potential impacts applying the precautionary principle. This is to determine if the plan will adversely affect the integrity of the European site(s) concerned. This process is known as a Habitats Regulations Assessment, and the first stage considers any likely significant effects (the screening stage).
- 2.5 Following the 2018 People over Wind⁴ ruling, mitigation measures cannot be applied at the screening stage in order to rule out likely significant effects and thus prevent the plan progressing to the second stage (appropriate assessment).
- 2.6 Where likely significant effects are identified at the screening stage, the second stage of the HRA process is triggered. This is named the ‘appropriate

¹ [Directive - 92/43 - EN - Habitats Directive - EUR-Lex](#)

² [The Conservation of Habitats and Species Regulations 2017](#)

³ [The Conservation of Habitats and Species \(Amendment\) \(EU Exit\) Regulations 2019](#)

⁴ [People over Wind ruling 2018](#)

assessment' and looks at the implications of a plan for a European site in view of the site's conservation objectives. Furthermore, mitigation measures may be introduced at the appropriate assessment stage to avoid or reduce the effects of a plan on the European site(s). Before a plan may be given effect, the plan-making authority, as competent authority, must ascertain that it would not adversely affect the integrity of the European site(s).

- 2.7 A neighbourhood plan cannot proceed to referendum or come into legal force without meeting a set of basic conditions as set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended)⁵. One of these basic conditions is that the neighbourhood plan must be compatible with EU obligations including the needs to demonstrate that it is not likely to have a significant effect on a European site.

3. Screening Methodology

- 3.1 This section of the report sets out the methodology that was undertaken for the HRA Screening Assessment for the draft Hailsham NDP Review. There is no statutory method for undertaking a HRA; however, the method used must be appropriate to its purpose under the Habitats Directive and Regulations.
- 3.2 Stage 1 of the HRA (i.e. the screening assessment) considers whether the plan is likely to result in a significant environmental effect on a European site. The following steps were undertaken during the screening stage:
1. Determining whether the plan/project is directly connected with or necessary to the management of European sites;
 2. Identifying the European sites that should be considered within the HRA;
 3. Gathering information in relation to the European Sites including:
 - Characteristics of European Sites;
 - Qualifying interests;
 - Conservation objectives;
 - Current site condition;
 - Threats to qualifying interests; and
 - Identification of relevant site management statements/plans.
 4. Identification of all plans or projects that could, in combination, have the potential to result in a significant adverse effect on a Natura 2000 site;

⁵ [Schedule 4B Town and Country Planning Act 1990](#)

5. Screening the plan for likely significant effects, alone and in combination with other plans and projects;

6. Rescreening of the Plan where changes to the Plan are made.

3.3 The purpose of screening/stage 1 is to assess whether further steps in the HRA process are required. This involves:

- Identifying and eliminating the elements of the plan which will have no effect on a European site;
- Identifying elements of the plan which would not be likely to have a significant effect on a European site, either alone or in combination with other plans and projects;
- Identifying the elements of the plan where it cannot be ruled out to not result in a likely significant effect, either alone or in combination with other plans or projects; and
- Assessing the significance of any effects on the European site.

4. Is the Neighbourhood Plan connected with or necessary to the management of a European site for nature conservation?

4.1 The draft Hailsham NDP Review is not directly connected with or necessary to the management of a European site / Ramsar Site. As a consequence, the draft NDP is therefore subject to a HRA as required by the Habitats Regulations.

5. Identifying the European sites that should be considered within the HRA

5.1 The screening exercise identifies the following European sites for consideration in the HRA:

- Ashdown Forest Special Area of Conservation (SAC);
- Ashdown Forest Special Protection Area (SPA);
- Pevensey Levels SAC and Ramsar site;
- Lewes Downs SAC;
- Castle Hill SAC;
- Hasting Cliffs SAC;
- Dungeness, Romney Marsh and Rye Bay SPA and Ramsar site; and
- Dungeness SAC.

6. Information gathered in relation to European sites / Pathways of Impact

- 6.1 Appendix 2 provides a summary of the information used as part of the screening process for European protected sites that were screened in. Appendix 3 provides further detail as to why the remaining European protected sites were excluded from further assessment.

7. Identification of all plans or projects that could, in combination, have the potential to result in a significant adverse effect on European protected sites

- 7.1 Plans with potential to create in combination effects include existing/emerging development plan documents in Wealden District and other neighbouring authority areas. This includes other existing and emerging neighbourhood plans. Windfall sites could also have an influence.
- 7.2 Appendix 4 provides a summary of the relevant plans and the elements of those plans that could cause harm to protected European Sites.
- 7.3 The policies within the draft Hailsham NDP Review only guide the type and form of development taking place. **The draft Hailsham NDP review does not allocate land for a specific purpose, and it does not propose a location or scale of development.**

8. Scope of the Screening Assessment

- 8.1 The HRA screening stage undertook an exercise to identify European/international sites using an initial 20km radius around Hailsham with the aim of screening the plan to identify whether it could result in a likely significant effect.
- 8.2 All European/International protected sites located further than 20km from Hailsham Neighbourhood Plan Area were not assessed further, considering impact pathways and distance being beyond 20km, and are therefore screened out. These include the following sites:
- Hastings Cliffs SAC;
 - Dungeness, Romney Marsh and Rye Bay SPA and Ramsar Site;
 - Dungeness SAC; and
 - Castle Hill SAC.
- 8.3 The following European protected sites are located within 20km of the neighbourhood area but were screened out of the assessment on the basis that the draft Hailsham Neighbourhood Plan would not result in a likely significant effect on these sites:
- Ashdown Forest SPA; and

- Lewes Downs SAC,
- 8.4 Further detail is provided at Appendix 3 as to why these European protected sites were excluded from further assessment at this stage.
- 8.5 The remaining European protected sites are therefore the focus of this HRA screening assessment and are as follows:
- Ashdown Forest SAC; and
 - Pevensey Levels SAC and Ramsar Site.

9. Air pollution at Ashdown Forest

- 9.1 Air quality monitoring has taken place across the Ashdown Forest SAC since 2014 and has identified that ambient concentrations measured at Ashdown Forest SAC for both Nitrogen Oxides (NO_x) and Ammonia (NH₃) are currently exceeding the critical level at some monitor locations close to the road on the A22, A26 and A275, which traverse across Ashdown Forest SAC.
- 9.2 In addition, dispersion modelling across Ashdown Forest SAC has identified that currently, some areas of the SAC are exceeding their critical levels for NO_x, NH₃ and nitrogen deposition.
- 9.3 The qualifying features underpinning the Ashdown Forest SAC designation are the presence of European dry heath, North Atlantic wet heath and great crested newts. The conservation objectives for the SAC can be summarised as ensuring the favourable conservation status of its qualifying features by, amongst other things, maintaining or restoring qualifying habitats.
- 9.4 Natural England's supplementary advice on conserving and restoring the SAC, linked to the Planning Practice Guidance (PPG), explains that the heathland habitat of the Ashdown Forest is sensitive to changes in air quality. Exceedance of 'critical values' for air pollutants may modify its chemical substrate, accelerating or damaging plant growth, altering its vegetation structure and composition and causing the loss of typical heathland species. Accordingly, development could result in an impact pathway to the SAC if it contributes to an exceedance in critical values.
- 9.5 The heathland habitat in the Ashdown Forest SAC is vulnerable to atmospheric pollution from several sources including vehicle emissions from motor vehicles. There is a potential impact pathway from increased traffic flows associated with new development on the roads which go through, or run adjacent to, the SAC. Many of the characteristic plants, mosses and lichens of heathland habitats are adapted to nutrient poor conditions and extra input of nitrogen can disadvantage these characteristic species in favour of others with a greater tolerance of higher nitrogen levels.

- 9.6 It is noteworthy that the Council proposed a new Local Plan to 2040⁶, with a Regulation 18 Draft Wealden Local Plan setting out the Council's draft policies and growth strategy for 15,729 net new homes and 84,850 square metres of employment floorspace. This draft Wealden Local Plan has been subject to an HRA⁷ in relation to the impact on the Ashdown Forest SAC, where it has been determined that the growth identified in the Local Plan would not adversely affect the integrity of the SAC. This advice regarding air quality is that this conclusion can be reached without mitigation measures being needed under the specific requirements of the Habitats Regulations. Following consultation on this Regulation 18 Draft Wealden Local Plan, the council summarised the representations made, and a report was presented to the Local Plan Sub-Committee on 5 March 2025. As a result of this consultation and changes to the National Planning Policy Framework, the council will be publishing a further Regulation 18 Local Plan in line with the Councils Local Development Scheme⁸.
- 9.7 In formulating these development plans, Natural England has advised that where an existing national, regional or local initiative can be relied upon to lead to the reduction in background levels of pollution at a site, the competent authority should assess the implications of a plan or project against an improving background trend. Ongoing air quality monitoring undertaken by the Council and its partners indicates that improvements in vehicle technology will come forward and this is a further consideration in assessing the effects on site integrity of the Ashdown Forest SAC arising from the draft Hailsham NDP.

10. Water quality and Hydrology at the Pevensey Levels SAC and Ramsar site

- 10.1 Additional new development and increased populations located within the hydrological catchment area of the Pevensey Levels have the potential to impose additional pressure on the conservation status of the Pevensey Levels SAC and Ramsar site through:

- Deterioration of water quality; and
- Changes in hydrological conditions.

Water quality

- 10.2 Water quality is governed not only by the quantity and type of contaminants, but also the volume and velocity of the water conveying the contaminants. Changes to water quality in the Pevensey Levels has the potential to affect the Conservation Objectives of the Pevensey Levels, including maintaining

⁶ [Regulation 18 Draft Wealden Local Plan March 2024](#)

⁷ [Habitats Regulations Assessment of the Wealden Local Plan, Regulation 18, February 2024](#)

⁸ [Local Development Scheme 2025](#)

the distribution of habitats and species, and moreover, maintaining the structure, function and supporting processes of those habitats supporting the species.

- 10.3 Surface water run-off has the potential to be a major source of water pollution. Pollutants reach wetland areas mainly through run-off whereby water flows over impervious surfaces picking up a number of pollutants generated by human activity. Such pollutants can include sediment from construction sites, toxic metals and petroleum wastes from roadways and industrial or commercial areas, nutrients and bacteria from residential areas and nutrients and pesticides from agriculture and gardening activities.
- 10.4 The Cuckmere and Pevensey Levels catchment area is served by a number of Wastewater Treatment Works (WwTW) in Wealden District. Hailsham North WwTW serves the northern part of Hailsham, Lower Horsebridge and several outlying villages including Chiddingly, Hellingly and Lower Dicker. Treated wastewater from the Hailsham North WwTW enters the Hurst Haven. Hailsham South WwTW currently serves the majority of Hailsham itself (to the south of the town), as well as Polegate and Willingdon. Treated wastewater from Hailsham South WwTW enters the Horse Eye Sewer and ultimately enters into the Hurst Haven also. Horam Parish is to the north of the Cuckmere and Pevensey Levels catchment area and is served by the Vines Cross WwTW that serves 12,000 people in Heathfield, Horam and surrounding villages. The treated wastewater enters into the Waldron Gill. These WwTWs discharge treated wastewater into the Pevensey Levels, in line with the Environmental Permits granted by the Environment Agency.
- 10.5 Both of the WwTWs at Hailsham treat wastewater to the highest standards available nationally before the effluent is discharged into the Pevensey Levels. However, in considering the current water quality status of receiving waters there is a risk that increased urbanisation could potentially cause further water quality deterioration.

Hydrology

- 10.6 Hydrology concerns the quantity, duration, rates, frequency and other properties of water flow. In relation to the Pevensey Levels, hydrology is central in maintaining specific designated species, including those species that are considered of European importance. The flora and fauna in the Pevensey Levels are not only dependent on the overall maintenance of water levels but also the velocity and volumes at which water is received into the watercourses, which is critical to the success of the ecosystems. The hydrology, and therefore the Conservation Objectives of the Pevensey Levels SAC and Ramsar site are potentially affected by a number of issues associated with new development.

- 10.7 Natural England has published a Site Improvement Plan for the Pevensey Levels (SIP171) that provides a high-level overview of the issues (both current and predicted) affecting the condition of the Natura 2000 features on the site(s) and outlines the priority measures required to improve the condition of protected features. In terms of hydrology, it was identified for Pevensey Levels SAC feature (the *Anisus vorticulus* or little ramshorn whirlpool snail) that one of the main threats would be inappropriate water levels. Specifically, maintaining adequate water levels (0.3cm below ditch neck) is critical to the feature and this is currently being delivered through a Water Level Management Plan to achieve appropriate water levels, which should be adequately monitored and maintained.
- 10.8 The development of land involving the covering over of natural geology with impermeable materials and structures can reduce the amount of water being received and stored by the underlying geology. As a result, and without mitigation, there would be an increase in the amount of overland flow, which means the amount of water being received in a shorter period of time creates greater volumes and velocities of water in the watercourses. In addition, the loss of vegetation in catchment area of the Pevensey Levels would similarly exacerbate this effect. The impact of development through the loss of permeability is dependent on the type of underlying geology and the topography.
- 10.9 There are a number of WwTWs located within the hydrological catchment area of the Pevensey Levels, which directly discharge treated wastewater into the receiving waters. This water maintains the levels in the receiving watercourses, and any increase or reduction in the volume of discharge has the potential to affect the ecosystem of the Pevensey Levels. Compulsory water metering is likely to reduce the amount of water being used for each household and could therefore reduce the volume of wastewater discharged via WwTWs, particularly at Hailsham North and South. Conversely, future development is likely to increase the amount of wastewater for discharge, though considering the requirement for water metering and water conservation measures in new development (these are subject to change), it is not clear how significant this will be and whether the effects of water metering will in fact balance the effects of new development.
- 10.10 The quantity and quality of waste discharge from all WwTW are under a consenting regime. During the preparation of Wealden's Core Strategy Local Plan (adopted in February 2013), it was apparent that additional discharges into the Pevensey Levels might be constrained and so a commitment was made to limit growth until an acceptable solution for treating wastewater had been identified. Southern Water has since identified options and a preferred solution (the provision of high-rate secondary treatment process at both WwTWs in order to overcome the environmental constraint), which has come

to fruition. Southern Water have also now produced a Drainage and Wastewater Management Plan (DWMP) for the Cuckmere and Pevensey Levels River Basin Catchment⁹. This includes measures to help protect the Pevensey Levels SAC and Ramsar site.

11. Screening the Plan for likely significant effects, alone and in combination with other plans and projects

11.1 The HRA screening assessment (at Table 1) considers whether each of the proposed policies and projects within the Pre-Regulation 14 draft Hailsham NDP Review is likely to have a significant effect on a protected European site.

11.2 There are several circumstances where a policy would have no likely significant effect on a European site¹⁰, which are as follows:

- a) **Intended to protect the natural environment**, including biodiversity, or to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on a European site;
- b) **Which will not themselves lead to development or other change**, for example, because they relate to design or other qualitative criteria for development or other kinds of change;
- c) **Which make provision for change, but which could have no conceivable effect on a European site**, because there is no link or pathway between them and the qualifying interests, or any effect would be a positive effect, or would not otherwise undermine the conservation objectives for the site;
- d) **Which make provision for change, but which could have no significant effect** on a European site (but is a minor residual effect), because any potential effects would be insignificant, being so restricted or remote from the site that they would not undermine the conservation objectives for the site; and
- e) **For which effects on any particular European site cannot be identified, because the policy is too general**, for example, it is not possible to identify where, when or how the policy may be implemented, or where effects may occur, or which sites, if any, may be affected.

⁹ [Southern Water Cuckmere and Pevensey Levels River Basin Catchment Area DWMP \(October 2022\)](#)

¹⁰ [Habitats Regulations Appraisal of Plans Guidance for Plan-Making Bodies in Scotland, January 2015, David Tyldesley and Associates](#)

Table 1. Screening Assessment for the Hailsham Neighbourhood Plan

Reference	Policy	Aim(s)	Significant effect? (Y/N)
HaCF1	Healthcare	This policy seeks to support the delivery of a range of healthcare facilities in sustainable locations within the Parish, preferably the town centre, but where this is not feasible the policy provides that consideration may be given to an alternative sustainable location that is accessible to all by public transport, foot and cycle. The policy includes the need for developments (where appropriate) to include rooms and facilities (including public toilets) that can be utilised by the public, other community groups and services.	<p>No</p> <p>This policy does not allocate a specific parcel of land for new healthcare facilities, and it does not consider the scale or timing of development. There are unlikely to be significant environmental effects from the proposed policy.</p> <p>Reason E</p>
HaCF2	Education & Early Years	This policy supports the delivery of proposals for new primary and early years school provision in locations accessible on foot. It also requires developments to deliver measures that encourage use of active and sustainable travel, to reduce car journeys.	<p>No</p> <p>This policy does not allocate a specific parcel of land for new primary and early years provision, and it does not consider the location or scale of development. There are unlikely to be significant environmental effects from the proposed policy.</p> <p>Reason E</p>

Reference	Policy	Aim(s)	Significant effect? (Y/N)
HaCF3	Community halls, centres and hubs	This policy provides support and guidance for new community facilities generally and identifies criteria for when this may be acceptable, as well as design criteria. It also lists the level of information an applicant would need to provide should a proposal involve the loss of a community facility.	<p>No</p> <p>This policy does not allocate land for new community facilities, and it does not consider the location or scale of development. There are unlikely to be significant environmental effects from the proposed policy.</p> <p>Reason E</p>
HaCF4	Allotments and food growing	The policy requires development proposals to provide new growing space in the form of allotments, community orchards or gardens.	<p>No</p> <p>This policy does not allocate land for allotments or community growing spaces, and it does not consider the location or scale of development. There are unlikely to be significant environmental effects from the proposed policy</p> <p>Reason B</p>
HaCF5	Sports facilities and playing pitches	This policy sets out criteria that proposals for new or improved sports facilities and playing pitches will need to meet.	<p>No</p> <p>This policy does not allocate land for sports facilities or playing pitches and it does not consider the location or scale of development. There are unlikely to be significant environmental effects from the proposed policy.</p>

Reference	Policy	Aim(s)	Significant effect? (Y/N)
			Reason E
HaCF6	Play and amenity space	This policy requires development, as appropriate, to contribute towards the provision of accessible and inclusive natural and semi-natural green spaces, amenity spaces and play space for children and young people. It sets out the criteria such developments will need to meet in this provision.	No This policy does not allocate land for play and amenity space, and it does not consider the location or scale of such development. There are unlikely to be significant environmental effects from the proposed policy. Reason E
Project PAS-01	Transforming existing residential streets into green streets	This project aims to support proposals from residents to transform residential streets into green or garden streets. The project seeks to identify a pilot project with the cooperation of homeowners and close partnership with the relevant authorities, including the local highways authority ahead of any longer-term roll-out of such a project. This will enable the identification of funding streams. This project is not a draft planning policy and will not be considered in determining planning applications if the Plan was to be adopted.	No This project seeks to improve both the built and natural environment through greening projects but is not a draft planning policy. Reason B

Reference	Policy	Aim(s)	Significant effect? (Y/N)
HaCF7	Burial space	This policy sets out criteria for development proposals of new burial grounds to meet.	<p>No</p> <p>This policy relates to the provision of burial space and sets specific criteria to be met. There are unlikely to be significant environmental effects from the proposed policy.</p> <p>Reason B</p>
HaCF8	Community infrastructure delivery	This policy sets out how community infrastructure is to be delivered as part of major development.	<p>No</p> <p>This policy relates to the delivery of community infrastructure as part of development proposals. This policy does not allocate land for community infrastructure delivery, and it does not consider the location or scale of such development. There are unlikely to be significant environmental effects from the proposed policy.</p> <p>Reason E</p>
HaTC1	Town Centre Uses	The policy aims to retain the role and function of Hailsham Town centre and encourage complimentary town centre uses (such as leisure, cultural, night-time economy, offices/business accommodation and	<p>No</p> <p>The policy does not seek to allocate land for development but indicates the broad location (i.e. within the town centre boundary</p>

Reference	Policy	Aim(s)	Significant effect? (Y/N)
		community facilities). It defines what uses will be supported within the town centre. It also requires that any development enhance the public realm and enhance and diversify the offer within the town centre, subject to assessment of scale, character, location and impact of proposed use.	for Hailsham) where development may be acceptable subject to criteria. The policy does not consider scale or the specific location of development. There are unlikely to be significant environmental effects from the proposed policy. Reason E
HaTC2	Town Centre design principles	This policy seeks to set design criteria for all new development within the town centre, following the Hailsham Design Guide and Code.	No This policy only relates to the design criteria /principles of new town centre development. There are unlikely to be significant environmental effects from the proposed policy. Reason B
HaTC3	Safety by design	This policy seeks to set design criteria for all new development and public spaces within the town centre to support gender inclusion and personal safety, embedding design principles that minimise opportunities for anti-social behaviour, crime and the fear of crime.	No This policy relates to the design of new town centre development. There are unlikely to be significant environmental effects from the proposed policy. Reason B

Reference	Policy	Aim(s)	Significant effect? (Y/N)
HaTC4	Shopfront design and signage	This policy seeks to set design criteria for shopfronts and signage within Hailsham town centre, in line with the Hailsham Design Guide and Code.	<p>No</p> <p>This policy relates to the design of shopfronts and signage within Hailsham town centre. There are unlikely to be significant environmental effects from the proposed policy.</p> <p>Reason B</p>
Project SHS-01	Shopfront improvements	<p>This project aims to explore opportunities to offer grants or other incentives to shop and landowners to promote the repair of damaged facades, reinstate lost historic features and install high quality traditional windows and shop fronts in the town centre.</p> <p>This project is not a draft planning policy and will not be considered in determining planning applications if the Plan was to be adopted.</p>	<p>No</p> <p>This project relates to exploring possible funding streams for shopfront improvements but is not a draft planning policy. There are unlikely to be significant environmental effects from the proposed project.</p> <p>Reason B</p>
HaTC5	Public realm, gateways and wayfinding	This policy sets out the criteria for development proposals, as appropriate to their scale, nature and location, to enhance the public realm, the sense of arrival (at gateway locations) and incorporate wayfinding signs.	<p>No</p> <p>This policy relates to criteria for the enhancement of the public realm, gateway locations and wayfinding signs through new development. There are unlikely to be</p>

Reference	Policy	Aim(s)	Significant effect? (Y/N)
			significant environmental effects from the proposed policy. Reason B
Project PRG-01	Town centre public realm improvements	<p>This project seeks to engage with the local community and partner organisations to explore opportunities that improve the quality of the public realm and highway network in the town centre.</p> <p>This project is not a draft planning policy and will not be considered in determining planning applications if the Plan was to be adopted.</p>	<p>No</p> <p>This project relates to the enhancement of the public realm through partnership working but is not a draft planning policy. There are unlikely to be significant environmental effects from the proposed project.</p> <p>Reason B</p>
HaTC6	Public Art	This policy sets out the criteria proposals for public art are required to meet.	<p>No</p> <p>This policy relates to criteria for the provision of public art. There are unlikely to be significant environmental effects from the proposed policy.</p> <p>Reason B</p>
HaTC7	Roofscape	This policy seeks to make more effective use of the town centres roofscape, setting out criteria for such proposals to be met.	<p>No</p> <p>This policy relates to criteria for the use of roof spaces within Hailsham town centre. There are unlikely to be significant</p>

Reference	Policy	Aim(s)	Significant effect? (Y/N)
			environmental effects from the proposed policy. Reason B
HaTC8	Town Centre parking	This policy aims to ensure that where existing parking provision is retained as part of new development, it is reconfigured to incorporate multi-functional green space and public realm improvements. It also sets out the requirements to justify a loss of parking provision within the town centre and criteria for proposals for multi-storey car parking.	No This policy relates to parking provision and its design. It does not allocate land or identify locations for parking provision. There are unlikely to be significant environmental effects from the proposed policy. Reason E
HaHD1	Housing design and character	This policy sets out the design criteria for development proposals that involve new housing, in line with the Hailsham Design Guide & Code.	No This policy relates to the design of new housing development. There are unlikely to be significant environmental effects from the proposed policy. Reason B
Project DC-01	Architectural variety and innovation	This project seeks to engage site promoters and developers in running architectural competitions that lead to variety and interest.	No This project relates to the design of new housing development but is not a draft planning policy. There are unlikely to be

Reference	Policy	Aim(s)	Significant effect? (Y/N)
		This project is not a draft planning policy and will not be considered in determining planning applications if the Plan was to be adopted.	significant environmental effects from the proposed project. Reason B
HaHD2	Well-integrated residential development	This policy sets out the criteria residential developments need to meet in terms of their integration into the existing environment, including taking a holistic approach to masterplanning and site layout where proposals involve multiple land ownership or which are adjacent to other allocated and potential future growth locations.	No This policy relates to how new residential development integrates into the existing environment / surroundings. The policy does not allocate land for development or consider the scale or the specific location of development. There are unlikely to be significant environmental effects from the proposed policy. Reason B
HaHD3	Sustainable design and construction	This policy focuses on setting criteria and design standards for new developments to a high level in terms of sustainable design and construction including optimising water and energy efficiency, targeting net zero carbon emissions and as far as possible being 'Future Homes Standard ready.	No This policy seeks to ensure that new development is of the highest possible standard in terms of its sustainable design and construction and set criteria for this. There are unlikely to be significant environmental effects from the proposed policy. Reason B

Reference	Policy	Aim(s)	Significant effect? (Y/N)
Project DR-01	Design review	<p>This project looks to establish a mechanism by which major development proposals are assessed through the Design South East Design Review Panel until such time as WDC runs and operates a Panel.</p> <p>This project is not a draft planning policy and will not be considered in determining planning applications if the Plan was to be adopted.</p>	<p>No</p> <p>This project looks to set up a design review process for new development. There are unlikely to be significant environmental effects from the proposed project.</p> <p>Reason B</p>
HaHD4	Housing mix, size and type	<p>This policy aims to ensure that a mix of different sized homes is provided on new residential developments, with a focus on smaller and mid-sized homes. It also seeks adaptable housing and supports specialist housing in accessible locations.</p>	<p>No</p> <p>This policy does not allocate land for new housing but would influence the mix of future housing, level of adaptability and supports specialist housing in accessible locations. There are unlikely to be significant environmental effects from the proposed policy.</p> <p>Reason B</p>
HaHD5	Self and custom build homes	<p>This policy sets out the criteria that the provision of self and custom build plots on major development schemes should meet.</p>	<p>No</p> <p>This policy does not allocate land for new housing development but sets out criteria for proposals involving self and custom build plots. There are unlikely to be significant</p>

Reference	Policy	Aim(s)	Significant effect? (Y/N)
			<p>environmental effects from the proposed policy.</p> <p>Reason B</p>
HaHD6	Street types, design and hierarchy	This policy sets out the criteria for the design of the street network as part of any development proposals.	<p>No</p> <p>The policy does set out the criteria for the street network and hierarchy where major development is proposed. It does support SuDs at criteria 3(d) wherever possible in line with national and local planning policy, but does not provide a location, timing or scale for such development (i.e. setting criteria for major development proposals). There are unlikely to be significant environmental effects from the proposed policy.</p> <p>Reason E</p>
HaHD7	Parking in new residential development	The aim of this policy is to provide criteria for parking provision and ensure its unobtrusive, benefits from natural surveillance, is integrated with areas of soft landscaping and is made from permeable materials.	<p>No</p> <p>This policy sets criteria for parking provision as part of new developments. The policy does not consider scale or the specific location of such development. There are unlikely to be significant environmental effects from the proposed policy.</p>

Reference	Policy	Aim(s)	Significant effect? (Y/N)
			Reason B
HaM1	Active and healthy travel	This policy requires the provision of active travel infrastructure on new developments and sets criteria for the design of new cycling and walking routes for new development. It aims to promote active travel.	No The policy relates to the design of new development. The policy does not consider scale or the specific location of development. There are unlikely to be significant environmental effects from the proposed policy. Reason B
Project MHT-01	Crossing the A22	This project seeks to explore the feasibility and costing of reopening and reusing a disused tunnel under the A22, and close to Hailsham Country Park, for pedestrians and cyclists. The project would be a partnership between the Town Council and East Sussex County Council. This project is not a draft planning policy and will not be considered in determining planning applications if the Plan was to be adopted.	No This project is looking to reopen an existing routeway for pedestrians and cyclists but is not a draft planning policy. The project does not consider scale or the specific location of development. There are unlikely to be significant environmental effects from the proposed project. Reason B
Project MHT-02	The Hailsham Country Line	This project seeks to support improvements in the Local Cycling and Walking Infrastructure Plan (LCWIP) published by East Sussex County Council, as well as identifying an	No This project is looking to facilitate a new connection for pedestrians and cyclists but is not a draft planning policy. The project does

Reference	Policy	Aim(s)	Significant effect? (Y/N)
		<p>opportunity for an additional north-south connection alongside the A22 connecting various leisure, recreation and community use in Hailsham as well as a direct connection to the new sports hub.</p> <p>This project is not a draft planning policy and will not be considered in determining planning applications if the Plan was to be adopted.</p>	<p>not consider scale or the specific location of development. There are unlikely to be significant environmental effects from the proposed project.</p> <p>Reason B</p>
HaM2	The Cuckoo Trail	This policy aims to retain and enhance the Cuckoo Trail, including the improvement of existing and creation of new access points to the Cuckoo Trail; the policy supports proposals that meet the criteria listed.	<p>No</p> <p>Within this draft policy, there is a potential for change to the Cuckoo Trail (e.g. the addition of hardstanding), including the provision of new access points to the Cuckoo Trail. However, the policy is generalised and does not consider the scale or the specific location of such development. There are unlikely to be significant environmental effects from the proposed policy.</p> <p>Reason E</p>
HaM3	Public transport	This policy supports proposals that incorporate sustainable transport measures, such as new	<p>No</p> <p>Within this policy, there is a potential for change (e.g. the addition of transport</p>

Reference	Policy	Aim(s)	Significant effect? (Y/N)
		bus routing, new or improved waiting facilities and other types of transport infrastructure	<p>infrastructure, waiting facilities, walking and cycling routes). However, the policy is generalised and does not consider the scale or the specific location of development. There are unlikely to be significant environmental effects from the proposed policy.</p> <p>Reason E</p>
HaM4	Community mobility hubs	This policy seeks to support the delivery of spaces specifically to house public and shared mobility modes and improve the public realm.	<p>No</p> <p>The policy will focus on shared spaces and facilities. The policy does not consider scale or the specific location of development and largely includes criteria for such proposals if they were to come forward. There are unlikely to be significant environmental effects from the proposed policy.</p> <p>Reason E</p>
HaM5	Electric vehicle charging points	This policy provides criteria for the delivery of EV charging infrastructure in Hailsham.	<p>No</p> <p>This policy is concerned only with the design and delivery of EV charging infrastructure. The policy does not consider scale or the specific location of development. There are</p>

Reference	Policy	Aim(s)	Significant effect? (Y/N)
			unlikely to be significant environmental effects from the proposed policy. Reason B
HaGI1	Biodiversity	The policy aims for new development to secure a minimum of 10% biodiversity net gain unless exempt and sets out a cascade approach to this. The policy also requires the incorporation of green infrastructure for new developments, that developments must not cause fragmentation of existing green corridors and networks and sets criteria for a variety of biodiversity measures to be included in development and on sites.	No The policy intends to protect the natural environment and provide green infrastructure. There are unlikely to be significant environmental effects from the proposed policy. Reason A
HaGI2	Access to green and blue infrastructure	This policy aims for the improvement of existing green and blue infrastructure through development specifically improving connectivity, condition, access and usability.	No This policy supports improved access to green and blue infrastructure. The policy does not consider scale or the specific location of development. There are unlikely to be significant environmental effects from the proposed policy. Reason B

Reference	Policy	Aim(s)	Significant effect? (Y/N)
Project SGI-01	Street greening	<p>Through this project, the Town Council is seeking to work with WDC and ESCC to promote the delivery of greener streets throughout Hailsham, exploring how underused green spaces and roadside verges might be better used to increase biodiversity value, provide new wildlife habitats and space for local food production.</p> <p>This project is not a draft planning policy and will not be considered in determining planning applications if the Plan was to be adopted.</p>	<p>No</p> <p>The project intends to improve the natural environment. The project does not consider scale or the specific location of development. There are unlikely to be significant environmental effects from the proposed project.</p> <p>Reason A</p>
HaGI3	Green infrastructure in the Town Farm Estate	This policy aims to deliver new green infrastructure specifically within the Town Farm Estate.	<p>No</p> <p>The policy intends to improve the natural environment within the Town Farm Estate. The policy does not consider scale or the specific location of development. There are unlikely to be significant environmental effects from the proposed policy.</p> <p>Reason A</p>
HaGI4	The Pevensey Levels	This policy sets out the requirements that development adjacent to the Pevensey Levels will be expected to meet.	<p>No</p> <p>This policy is specifically aimed at protecting the Pevensey Levels from the impacts of development and will work alongside local</p>

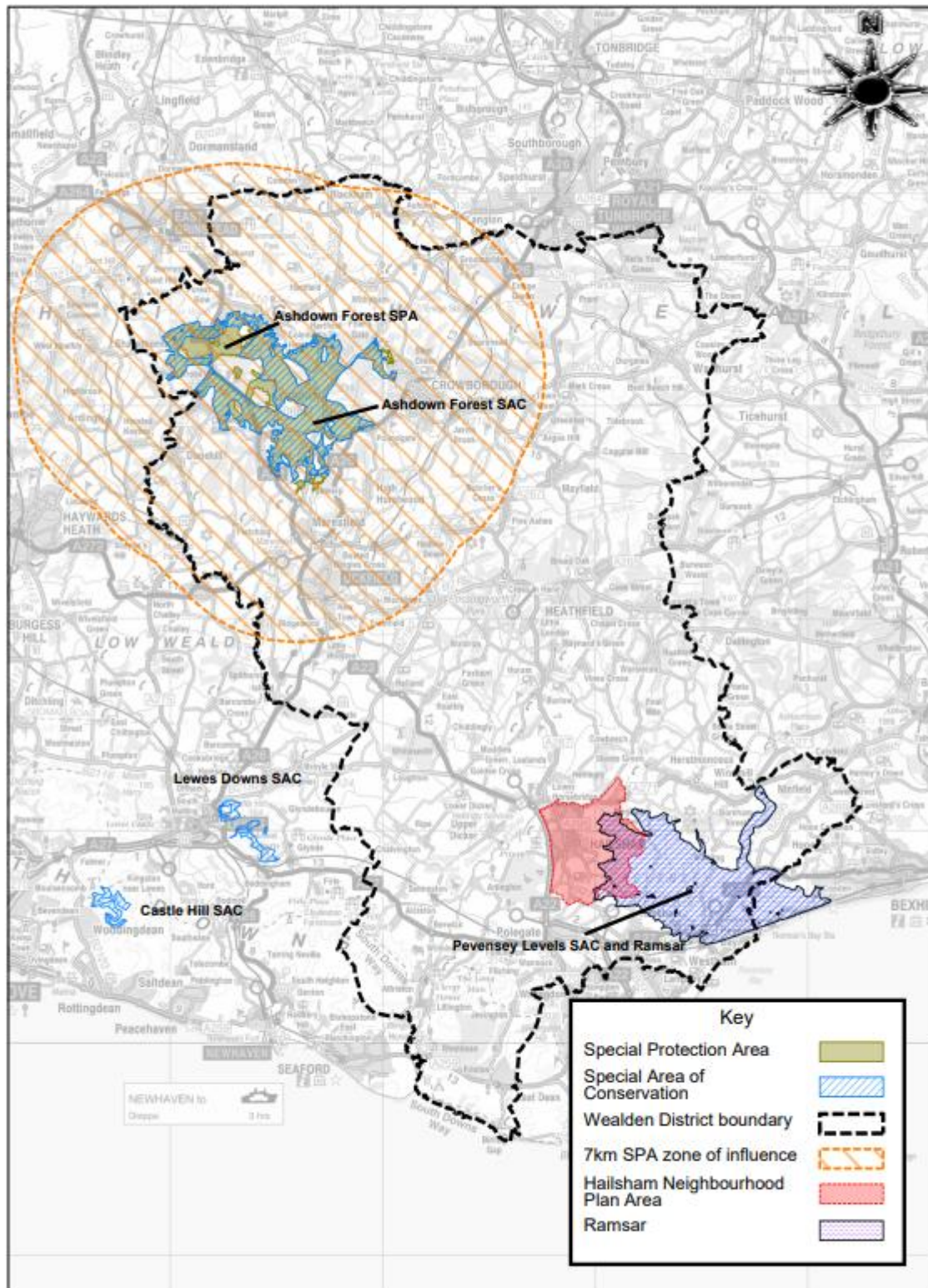
Reference	Policy	Aim(s)	Significant effect? (Y/N)
			and national policies for the protection of the Pevensy Levels Ramsar site and SAC. Reason A
HaGI5	Flood Risk and Sustainable drainage	The policy sets a number of criteria to reduce flooding in Hailsham as a result of new development. The policy also seeks to ensure that surface water drainage for new developments will be based on, and incorporate, sustainable drainage principles and SuDS systems.	No The policy intends to protect the built and natural environment. The policy does not consider the scale or the specific location of new development. It does support SuDs at line with national and local planning policy, but does not provide a location, timing or scale for such development. There are unlikely to be significant environmental effects from the proposed policy. Reason A
HaGI6	Paving of front gardens	This policy sets out the criteria where development involves the paving over of front gardens, including the need for incorporating SuDS, using natural permeable/porous materials and avoiding the discharge of runoff into the drainage system.	No This policy sets out the criteria where development involves the paving over of front gardens. However, the policy does not allocate land for this specific purpose, and it does not consider the location or scale of development. Furthermore, it includes the requirements to use permeable surfacing,

Reference	Policy	Aim(s)	Significant effect? (Y/N)
			<p>SuDS and avoidance of direct runoff into the drainage system.</p> <p>Reason E</p>
Project FG-01	Reinstating front gardens	<p>This project seeks to encourage homeowners to 'de-pave' their gardens of hardstanding and impermeable surfaces.</p> <p>This project is not a draft planning policy and will not be considered in determining planning applications if the Plan was to be adopted.</p>	<p>No</p> <p>The project intends to protect / improve the natural environment. The project does not consider scale or the specific location of development. There are unlikely to be significant environmental effects from the proposed policy.</p> <p>Reason B</p>

12. Conclusion

- 12.1 As a result of the assessment in Section 11, we can conclude that the Pre-Regulation 14 draft Hailsham NDP Review will in itself, not result in a 'likely significant effect' on a European site, in particular the Ashdown Forest SAC or Pevensey Levels SAC and Ramsar site.
- 12.2 Several of the policies within the Screening Assessment seek to support development by confirming acceptability criteria for development types in the plan area. However, the policies do not in themselves allocate land for development or seek to ensure that any such development comes forward as a result of the policies (i.e. its criteria for when such developments do come forward to the Local Planning Authority (LPA)). The policies provide a framework to guide development should it be the case that development comes forward. At the Neighbourhood Plan level, the policies are therefore too general to make an assessment (see the table above and policies that had reasoning as category E).
- 12.3 It is therefore considered appropriate to rely on the provision in the Habitat Regulations that requires a habitats regulations assessment at a later stage, which in this case would be at the planning application stage, when the exact detail and location of any proposed development in which to undertake an assessment will be available.
- 12.4 Based on the conclusion above, **an 'appropriate assessment' of the Pre-Regulation 14 Hailsham Neighbourhood Plan Review is not required** to be made under Article 6(3) of the Habitats Directive (92/43/EEC), as set out in the Conservation of Habitats and Species Regulations 2017 (the "Habitats Regulations"), as amended. Wealden District Council consulted Natural England on this report and its conclusion. Natural England did not have any specific comments on the draft neighbourhood plan and made reference to their standing advice.
- 12.5 Natural England's full response is available at Appendix 5. Should significant changes be made to the Plan as it develops, a new screening assessment may be required.

Appendix 1: Map showing location of Hailsham Neighbourhood Area and nearby European Sites



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Appendix 2: European and Ramsar site Information

Site	Pevensey Levels SAC
Characteristics of European site	<p><u>Habitat Present</u></p> <ul style="list-style-type: none"> • NO6 - Inland water bodies (Standing water, running water) (2.5%) • N10 - Humid grassland, Mesophile grassland (97.5%)¹¹ <p><u>Other Characteristics</u></p> <p>1 Terrestrial: Soil & Geology: nutrient-poor, clay, alluvium, peat, basic, shingle, sand, mud, sedimentary</p> <p>2 Terrestrial: Geomorphology and landscape: lowland, coastal, floodplain¹²</p> <p>Pevensey Levels is one of the largest and least-fragmented lowland wet grassland systems in southeast England. The area is largely reclaimed land with extensive grazed wet meadows actively maintained by purpose-built drainage systems and characteristic dykes. A small area of shingle and intertidal muds and sands is included within the site. The site supports a variety of important wetland communities, including nationally rare and scarce aquatic plants and invertebrates, and a notable assemblage of breeding and wintering wildfowl¹³.</p>
Qualifying Interests	<p><u>Special Area of Conservation</u></p> <p>Annex I habitats that are a primary reason for selection of this site:</p> <p>Not applicable.</p>

¹¹ [JNCC Website](#)

¹² [Standard Data Form for sites within the 'UK national site network of European sites'](#)

¹³ [European Site Conservation Objectives: Supplementary advice on conserving and restoring site features](#)

Site	Pevensey Levels SAC
	<p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site: Not applicable.</p> <p>Annex II species that are a primary reason for selection of this site: 4056 Ramshorn snail <i>Anisus vorticulus</i> <i>Anisus vorticulus</i> occurs across a range of sites in southern and eastern England. Pevensey Levels is a large and expansive grazing marsh that supports <i>Anisus vorticulus</i> in both a wide spatial distribution and in good population density classes¹⁴.</p> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection: Not applicable.</p>
<p>Conservation Objectives</p>	<p>With regards to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change.</p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:</p> <ul style="list-style-type: none"> • The extent and distribution of the habitats of qualifying species: • The structure and function of the habitats of qualifying species: • The supporting processes on which the habitats of qualifying species rely: • The populations of qualifying species; and • The distribution of qualifying species within the site¹⁵.

¹⁴ [JNCC Website](#)

¹⁵ [European Site Conservation Objectives for Pevensey Levels SAC](#)

Site	Pevensey Levels SAC
Current Site Condition	The SSSI is considered to be in 76.92% unfavourable recovering, 7.69% partially destroyed and 15.38% not recorded ¹⁶ .
Threat to Qualifying Interests	<p>Threats and Pressures</p> <p><u>Negative</u></p> <ul style="list-style-type: none"> • H02 - Pollution to groundwater (point sources and diffuse sources) (inside and outside site) • I01 - Invasive non-native species (inside and outside site) • J02 - Human induced changes in hydraulic conditions (inside and outside site) <p><u>Positive</u></p> <ul style="list-style-type: none"> • B02 - Forest and Plantation management & use (inside site) • A02 - Modification of cultivation practices (inside site) • A06 - Annual and perennial non-timber crops (inside site) • A04 – Grazing (inside site) • D05 - Improved access to site (inside site)¹⁷
Factors that could adversely affect the site's ecological character including changes in land (including water) use and development projects	<ul style="list-style-type: none"> • Introduction / invasion of non-native plant species (of particular relevance is floating pennywort); • Pollution – domestic sewage (sewage treatment works). <p>Anisus vorticulus is a species of the upper water levels of ditches, frequently amidst botanically rich vascular plant assemblages in a mid to upper mid successional state. It favours alkaline waters although it appears tolerant of a</p>

¹⁶ This is the latest position from the Natural England website [SSSI Condition Summary \(October 2025\)](#)

¹⁷ [Standard Data Form for sites within the 'UK national site network of European Sites'](#)

Site	Pevensey Levels SAC
	<p>relatively wide range of physio-chemical parameters. Appropriate ditch management is the key to the conservation of this species. Control of shade-inducing marginal vegetation is also important, as is maintaining access to the water's edge for livestock. It is also important to ensure good water quality by instigating the appropriate safeguards. This is being implemented through good environmental management, Catchment Sensitive Farming, Environmental Stewardship and Environment Agency's review of existing discharge and abstraction consents. A Water Level Management Plan, devised and managed by Environment Agency, is in place to control ditch levels. Environmental Stewardship schemes continue to encourage sensitive management, particularly of the ditches to address problems brought about by neglect. The main threats to the species include land drainage, inappropriate habitat management and eutrophication.</p>
Key Environmental Conditions to Maintain Site Integrity	<p>The Lesser whirlpool ram's-horn snail <i>Anisus vorticulus</i> is a small aquatic snail with a flattened spiral shell rarely more than 5 mm in diameter. It occurs in unpolluted, calcareous waters in marsh drains with a dense aquatic flora, and favours ditches with a diverse flora but little emergent vegetation. It often floats on the surface amongst duckweed <i>Lemna</i> spp. Ditches that are either completely cleared of vegetation or are choked with weed and silt are unsuitable. Winter flooding may be important in enabling young snails to colonise new ditches¹⁸.</p>
Relevant Site Management Plans / Statements	<p>Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Pevensey Levels SAC</p> <p>The plan identifies a number of priorities, issues and actions in relation to:</p>

¹⁸ [European Site Conservation Objectives: Supplementary advice on conserving and restoring site features](#)

Site	Pevensey Levels SAC
	<ul style="list-style-type: none"> • Inappropriate water levels; • Invasive species; and • Water pollution¹⁹.

¹⁹ [Site Improvement Plan Pevensey Levels](#)

Site	Pevensey Levels Ramsar site
Characteristics of European Site	The site is one of the largest and least fragmented lowland wet grassland systems in southeast England, including a small area of shingle and intertidal muds and sands. The low-lying grazing meadows are intersected by a complex system of ditches which support rare and scarce aquatic plants and invertebrates (freshwater molluscs and dragonflies Odonata spp) as well as breeding and wintering wildfowl ²⁰ .
Qualifying Interests	<p><u>Ramsar Criterion 2a</u> The site supports an outstanding assemblage of wetland plants and invertebrates including many British Red Data Book species.</p> <p><u>Ramsar Criterion 2b</u> The site is of special value for maintaining the genetic and ecological diversity of the region. It is probably the best site in Britain for freshwater molluscs, one of five best sites for aquatic Coleoptera and supports an outstanding assemblage of dragonflies Odonata spp²¹.</p>
Ecological Features	Pevensey Levels supports a range of important communities of wetland flora and fauna. Various stages of succession are present in the ditches. Floating and submerged aquatic plants such as duckweeds Lemna spp, pondweeds Potamogeton spp, or water fern Azolla spp. represent the pioneer stages. Larger floating or emergent plants such as frogbit Hydrocharis morsusranae, bur-reed Sparganium erectum and arrow head Sagittaria sagittifolia follow these. Finally, common reed Phragmites australis or hawthorn Crataegus monogyna becomes dominant. Left undredged, the ditches lose their diversity and varied structure. A rich bankside flora is also present on site. An area of shingle and intertidal muds and sands is another important component of the site. Some flora associated with the shingle is present. For example, yellow horned-poppy Glaucium flavum and sea campion

²⁰ [Ramsar sites Information Service](#)

²¹ [Ramsar Information Sheet](#)

Site	Pevensey Levels Ramsar site
	<p>Silene uniflora. The site supports outstanding invertebrate populations and is a top site for Mollusca and aquatic Coleoptera. Over 15 species of dragonfly (Odonata) have been recorded, including several scarce species. One of Britain's largest and rarest spiders, the fen raft spider Dolomides plantarius has its stronghold at Pevensey. The lowland wet grassland supports a variety of bird species. For example, wintering lapwing and snipe. Breeding bird species include sedge warblers, reed warblers that nest in the scrub and reeds in the ditches respectively²².</p> <p><u>Noteworthy Flora</u></p> <p>Nationally important species occurring on the site Higher plants:</p> <ul style="list-style-type: none"> • Althaea officinalis • Ceratophyllum submersum • Crambe maritima • Potamogeton acutifolius • Potamogeton friesii • Potamogeton trichoides • Sium latifolium • Stratiotes aloides <p><u>Noteworthy fauna</u></p> <p>Nationally important species occurring on the site:</p> <ul style="list-style-type: none"> • Segmentina nitida • Anisus vorticulus • Valvata macrostoma

²² [Information Sheet on Ramsar Wetlands \(RIS\)](#)

Site	Pevensey Levels Ramsar site
	<ul style="list-style-type: none"> • Hydrophilus piceus • Gyrinus suffriani • Elmatophilus brevicollis • Bagous puncticollis • Dolomedes plantarius • Atylotus rusticus • Odontomyia ornate • Pherbellia argyra • Psacadina zernyi • Limophalia pictipennis • Tipula marginata • Placobdella costata <p><u>Assemblage of International importance</u></p> <p>The site supports an appreciable assemblage of rare, vulnerable or endangered species or subspecies of plant or animal. Pevensey Levels is probably one of the best sites in Great Britain for freshwater molluscs, one of the very best sites for aquatic Coleoptera and supports an outstanding assemblage of Odonata²³</p>
Adverse Factors affecting the Ecological Character of the Site	<ul style="list-style-type: none"> • Vegetation succession; • Eutrophication; • Introduction of invasive / exotic species; • Pollution – domestic sewage; • Pollution – fertilisers;

²³ [Information sheet on Ramsar Wetlands](#)

Site	Pevensey Levels Ramsar site
	<ul style="list-style-type: none"> • Pollution – pesticides/ agricultural runoff; and • General disturbance from human activities²⁴.
Key Environmental Conditions of Importance in Sustaining the Site Integrity	<ul style="list-style-type: none"> • Unpolluted water; • Low levels of nutrient enrichment (primarily from surface runoff and hydrological pathways, but also from atmospheric deposition); • Control of non-native species (e.g. pennywort and Crassula sp.); • Maintenance of appropriate hydrological regime; and • Control of recreational disturbance.
Current Site Condition	See above in relation to SAC
Relevant Site Management Plans/Statements	<p><u>Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Pevensey Levels Ramsar Site</u></p> <p>This is the same as the IPENS for the SAC. Please see above.</p>

²⁴ [Ramsar Information Sheet](#)

Site	Ashdown Forest SAC
Characteristics of European Site	<p>N08 – Heath, Scrub, Maquis and Garrigue, Phygrana 60% coverage N19 – Mixed woodland 40% coverage</p> <p><u>Other Characteristics</u></p> <p>1. Terrestrial: Soil & Geology: sandstone, acidic, clay, nutrient-poor 2. Terrestrial: Geomorphology and landscape: lowland²⁵</p>
Qualifying Interests	<p>Special Area of Conservation (SAC)</p> <p><u>Annex I habitats that are a primary reason for selection of this site:</u></p> <p>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> for which this is considered to be one of the best areas in the United Kingdom.</p> <p>Ashdown Forest contains one of the largest single continuous blocks of lowland heath in south-east England, with both 4030 European dry heaths and, in a larger proportion, wet heath. The M16 <i>Erica tetralix</i> – <i>Sphagnum compactum</i> wet heath element provides suitable conditions for several species of bog-mosses <i>Sphagnum spp.</i>, bog asphodel <i>Narthecium ossifragum</i>, deergrass <i>Trichophorum cespitosum</i>, common cotton-grass <i>Eriophorum angustifolium</i>, marsh gentian <i>Gentiana pneumonanthe</i> and marsh clubmoss <i>Lycopodiella inundata</i>.</p> <p>The site supports important assemblages of beetles, dragonflies, damselflies and butterflies, including the nationally rare silver-studded blue <i>Plebejus argus</i>, and birds of European importance, such as European nightjar <i>Caprimulgus europaeus</i>, Dartford warbler <i>Sylvia undata</i> and Eurasian hobby <i>Falco subbuteo</i>.</p> <p>4030 European dry heaths for which this is considered one of the best areas in the United Kingdom.</p> <p>The dry heath in Ashdown Forest is an extensive example of the south-eastern H2 <i>Calluna vulgaris</i> – <i>Ulex minor</i> community. This vegetation type is dominated by heather <i>Calluna</i></p>

²⁵ [Standard Data Form for sites within the 'UK national site network of European sites'](#)

	<p><i>vulgaris</i>, bell heather <i>Erica cinerea</i> and dwarf gorse <i>Ulex minor</i>, with transitions to other habitats. It supports important lichen assemblages, including species such as <i>Pycnothelia papillaria</i>. This site supports the most inland remaining population of hairy greenweed <i>Genista pilosa</i> in Britain²⁶.</p> <p><u>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</u></p> <p>Not applicable.</p> <p><u>Annex II species that are a primary reason for selection of this site:</u></p> <p>Not applicable.</p> <p><u>Annex II species present as a qualifying feature, but not a primary reason for site selection:</u></p> <p>1166 Great crested newt <i>Triturus cristatus</i> for which the area is considered to support a significant presence.</p>
Conservation Objectives	<p>Natural England last published the Conservation Objectives for Ashdown Forest SAC on 27 November 2018²⁷, updating the earlier version dated 30 June 2014, to reflect the consolidation of the Habitats Regulations in 2017.</p> <p>With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats and habitats of qualifying species; • The structure and function (including typical species) of qualifying natural habitats; • The structure and function of the habitats of qualifying species;

²⁶ [JNCC website](#)

²⁷ [European Site Conservation Objectives for Ashdown Forest Special Area of Conservation](#)

	<ul style="list-style-type: none"> • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely; • The populations of qualifying species; and • The distribution of qualifying species within the site.
Current Site Condition	Ashdown Forest SSSI is currently considered to be in 25% unfavourable recovering condition, 6.25% unfavourable declining condition and 68.75% not record condition ²⁸ .
Threats to Qualifying Interests	<p><u>Negative</u></p> <ul style="list-style-type: none"> • H04 - Air pollution, air-borne pollutants (inside and outside site) • J02 - Human induced changes in hydraulic conditions (inside and outside site) • A02 - Modification of cultivation practices (inside site) • G01 - Outdoor sports and leisure activities, recreational activities (inside site) <p><u>Positive</u></p> <ul style="list-style-type: none"> • A02 - Modification of cultivation practices (inside site)²⁹
Ecological Requirements of Annex I Habitats and Annex II Species	<p><u>H4010 Northern Atlantic Wet Heaths <i>Erica tetralix</i></u> – Wet heath is a community that requires acid, nutrient poor soils that are at least seasonally waterlogged. Wet heath often occupies areas of impeded drainage on lower valley sides and less-steeply sloping ground. Drainage is a key factor. Wet heath can occur naturally, due to abiotic factors such as soil acidity, low nutrient status and waterlogged soil conditions, which impedes succession to woodland. Wet heaths require relatively high rainfall and an even spread of rain throughout the year. Relative humidity is required to remain moderately high with winters not too cold and summers not too hot. Mild winter temperatures are important for many of the individual plant and animal species.</p> <p><u>H4030 European dry heaths</u> – European dry heaths typically occur on freely-draining, dry acidic to calcareous soils with generally low nutrient content. Nearly all dry heath is semi-natural, being derived from woodland and developed through grazing and burning. Dry</p>

²⁸ [Natural England SSSI Condition Summary for Ashdown Forest SAC as of September 2025](#)

²⁹ [Standard Data Form for sites within the 'UK national site network of European sites'](#)

	<p>heaths vary in their flora and fauna according to climate, and are also influenced by altitude, aspect, soil conditions (especially base-status and drainage), maritime influence and grazing and burning intensity.</p> <p><u>Great crested newt</u> - Great crested newts rely on waterbodies for breeding but otherwise they spend much of their lives on land. They live over winter on land, normally hibernating underground and emerge soon after the first frost-free days in January or February to begin the migration to breeding ponds. Movement on land occurs almost exclusively at night and their progress is dependent on factors such as evening temperatures and rainfall, favouring wet or damp conditions with temperatures above 5 Celsius. Great crested newts require quite specific pond conditions for breeding. Ponds ideally need to have neutral to alkaline water (pH 6 or above) with areas of open water and well vegetated margins. Breeding ponds tend to be nutrient rich, not too shaded, free of fish with not too many waterfowl present. They require suitable refuges to use in extreme weather and during daytimes, such as large pieces of rotting deadwood, rubble piles or disused mammal burrows.</p>
Relevant Site Management Plans / Statements	<p><u>Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Ashdown Forest SAC</u></p> <p>The plan³⁰ identifies a number of priorities, issues and actions in relation to:</p> <ul style="list-style-type: none"> • Change in land management; • Air Pollution: impact of atmospheric nitrogen deposition; • Public Access/Disturbance; and • Hydrological changes.

³⁰ [Site Improvement Plan: Ashdown Forest](#)

Appendix 3: Sites excluded from HRA assessment and justification

Site	Impact Pathway	Assessment
Ashdown Forest SPA	Disturbance Urbanisation	The Hailsham Neighbourhood Plan Area falls outside of the 7km zone within which it has been identified that residential development is likely to result in adverse impacts on the SPA from increases in visitor numbers and effects of urbanisation such as cat predation (see map at Appendix 1).
Lewes Downs SAC	Air Pollution Disturbance	The Hailsham Neighbourhood Area is located over 15 km from the Lewes Downs SAC at its closest point. Natural England's advice in relation to potential impacts of air quality is that 'the only habitat likely to be impacted by air quality deterioration is woodland, which is not a qualifying feature of the Lewes Downs SAC'. As such, notwithstanding the fact that no sites are being allocated in the neighbourhood plan, air quality impacts (derived from new development) within Hailsham are unlikely to cause significant effects on the Lewes Down SAC. It is also not considered that the Neighbourhood Plan, either by itself or in combination with other plans, would increase the numbers of visitors to the site significantly.
Castle Hill SAC	Air Pollution	Castle Hill SAC is located over 20 km from the Hailsham Neighbourhood Area. The nearest main road is the Falmer Road, which is located approximately 400m west of the SAC. The SAC therefore falls outside of the area where it is considered that an increase in traffic (derived from new development) could result in likely significant effect.
Hastings Cliffs SAC	Air pollution Disturbance	The Hasting Cliffs SAC is located over 22 km from the Hailsham Neighbourhood Area. The SAC therefore falls outside of the area where it is considered that an increase in traffic (derived from any new development) could result in a likely significant effect.

Site	Impact Pathway	Assessment
	Hydrology	Additionally, it is unlikely that development arising from the draft Hailsham NDP, or within Wealden District overall, would have an effect on the water quality or hydrology of the SAC.
Dungeness, Romney Marsh and Rye Bay SPA and Ramsar site.	Disturbance Air Pollution Hydrology	Dungeness, Romney Marsh and Rye Bay SPA and Ramsar site are located over 40 km from the Hailsham Neighbourhood Area. Given the distance, development within the Hailsham Area will not result in adverse air pollution, water quality or hydrological impacts.
Dungeness SAC	Disturbance Air Pollution Hydrology	Dungeness SAC is located over 32 km from the Hailsham Neighbourhood Area. Given the distance, development within the Hailsham Area will not result in adverse air pollution, water quality or hydrological impacts.

Appendix 4: Other relevant plans

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
Wealden Core Strategy Local Plan ³¹ (adopted February 2013)	The Wealden Core Strategy is the main strategic planning policy document for the district that sets out how the places and communities within Wealden will change up until 2027. This includes strategic development areas for residential, employment and retail development, amongst other matters.	The Wealden Core Strategy planned to provide for 9,440 dwellings over the period 2006-2027. Provision will be made for some net additional 40,000 sq. metres net employment floorspace (B1 ³² /B2/B8) to provide for 128,695 sq. metres net employment floorspace and 17,000 sq. metres net additional retail floorspace over the period 2006-2027.
Wealden Affordable Housing Delivery Local Plan ³³ (adopted May 2016)	This document is the Affordable Housing Delivery Local Plan, which reviews the Wealden District (incorporating the SDNP) Core Strategy Local Plan Policy WSC8 concerning affordable housing. This Local Plan is limited to affordable housing provision and the adopted Core Strategy Policy WCS8 concerning affordable housing and does not affect any other Core Strategy policy.	This Plan only reviews affordable housing policy and does not look to allocate new land for development so will not cause any likely significant 'in-combination' effects.

³¹ [Wealden Core Strategy Local Plan \(adopted February 2013\)](#)

³² This is now Use Class E.

³³ [Wealden Affordable Housing Delivery Local Plan \(adopted May 2026\)](#)

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
Wealden (Regulation 18) Draft Local Plan March 2024	This Draft Wealden Local Plan is proposed as the main strategic planning policy document for Wealden District, with the view of replacing the current adopted development plans. The emerging Local Plan looks ahead to 2040 and will provide a vision for the district, a long-term spatial strategy for growth, including the locations where development will take place.	This emerging Plan would replace the adopted development plan documents above. The Plan is draft at this stage, having undergone consultation; the responses to which are being considered before the Plan is advanced further. Given the draft nature of the Plan, limited weight is attached to potential effects for the purposes of this SEA/HRA screening.
Rother Local Plan Core Strategy ³⁴ (adopted September 2014)	The Rother Core Strategy sets out the Council's vision and objectives that will guide the future pattern and form of development within the district over the Plan period up until 2028.	The Rother Core Strategy planned for at least 5,700 dwellings (net) and 100,000 sq. metres of gross additional business floorspace in the district over the period. It was envisaged that 3,100 dwellings and at least 60,000 sq. metres of business floorspace would be located in/around Bexhill.
Rother District Council Development and Site Allocations Local Plan ³⁵	The Rother Development and Site Allocations Local Plan sets out the Council's development management policies and also incorporates site allocations to meet the identified need for new homes considered in the Rother Core Strategy	This Plan only seeks to allocate specific parcels of land to meet the targets for individual settlements and types of development within the district as published within the Rother District Core Strategy. As a consequence, this Plan does not seek to

³⁴ [Rother Local Plan Core Strategy \(adopted September 2014\)](#)

³⁵ [Rother Development and Site Allocations Local Plan \(adopted December 2019\)](#)

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
(adopted December 2019)	Local Plan. This covers Bexhill and villages that are not covered by Neighbourhood Plans.	deliver more dwellings, retail floorspace or employment floorspace than is outlined within the Rother District Core Strategy, albeit those specific locations for such new development have now been established.
Tunbridge Wells Borough Core Strategy ³⁶ (adopted June 2010)	The Tunbridge Wells Borough Council Core Strategy is to guide new development and change in the district for the period up to 2026.	The Tunbridge Wells Core Strategy planned for at least 6,000 dwellings to be provided in the borough in the period 2006 to 2026. The Core Strategy also sought to deliver 26,500 sq. metres of comparison retail floorspace to the end of 2017.
Tunbridge Wells Borough Site Allocations Local Plan ³⁷ (adopted July 2016)	The main purpose of the Tunbridge Wells Borough Site Allocations Local Plan is to allocate land for housing, employment, retail and other land uses to meet the identified needs of communities within Tunbridge Wells borough to 2026 and beyond. This follows the strategic objectives and sustainable development objectives set out within the Core Strategy.	This Plan only seeks to allocate specific parcels of land to meet the targets for individual settlements and types of development within the borough as published within the Tunbridge Wells Borough Core Strategy. As a consequence, this Plan does not seek to deliver more dwellings, retail floorspace or employment floorspace than is outlined within the Tunbridge Wells Borough Core Strategy, albeit those specific locations for such new development have now been established.

³⁶ [Tunbridge Wells Borough Core Strategy \(adopted June 2010\)](#)

³⁷ [Tunbridge Wells Borough Site Allocations Local Plan \(adopted July 2016\)](#)

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
Tunbridge Wells Borough Submission Local Plan 2021 ³⁸	At time of writing, the Tunbridge Wells Borough Submission Plan has recently undergone a consultation on proposed main modifications post an Examination in Public_(EiP). If adopted, it will guide development in Tunbridge Wells to 2038 and include an early review necessary to meet unmet housing need at the end of the Plan period.	The Tunbridge Wells Borough Submission Local Plan 2021 now seeks to provide a minimum of 12,204 dwellings and 14 hectares of employment land over the plan period ³⁹ .
Mid Sussex District Plan 2014 -2031 ⁴⁰ (adopted March 2018)	The Plan sets out a vision for how Mid Sussex wants to evolve and a delivery strategy for how that will be achieved. As such, it sets out broad guidance on the distribution and quality of development in the form of 'higher level' strategic policies.	The Mid Sussex District Plan (adopted in March 2018) seeks to provide a minimum of 16,390 dwellings between 2014 and 2031 within the district. For employment, the Plan confirms that the total number of additional jobs required within the district over the plan period is estimated to be average of 543 jobs per year, with only a single allocation of 25 hectares of land as a high quality business park at Burgess Hill.

³⁸ [Tunbridge Wells Borough Submission Local Plan \(October 2021\)](#)

³⁹ This based on the Schedule of Proposed Modifications for consultation published on 17 March 2025.

⁴⁰ [Mid Sussex District Plan 2014-2031 \(adopted March 2018\)](#)

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
Mid Sussex District Site Allocations Development Plan Document ⁴¹ (adopted June 2022)	The Mid Sussex District Site Allocations DPD provides a framework for the location of new jobs and homes to 2031 and aims to meet the housing and employment requirements established in the Mid Sussex District Plan.	The Site Allocations DPD allocates additional development sites to meet the residual need necessary to meet the agreed housing requirement as reflected in the District Plan 2014-2031. The Site Allocations DPD also allocates additional employment sites, including a Science and Technology Park to the west of Burgess Hill.
Eastbourne Core Strategy Local Plan ⁴² (adopted February 2013)	The Eastbourne Core Strategy Local Plan sets out the Council's spatial vision for Eastbourne up to 2027 and the primary land-use policies to deliver it. It is the key strategic Local Plan upon which other development plan documents are based.	The Eastbourne Core Strategy states that a minimum of at least 5,022 dwellings and 55,430 sq. metres of employment land will be delivered by 2027 within the built-up area boundary of Eastbourne.
Eastbourne Town Centre Local Plan ⁴³ (adopted November 2013)	The Eastbourne Town Centre Local Plan seeks to set out a strategy and proposals for the regeneration of the Town Centre and seeks to shape development within the town centre to 2027. The document was prepared in accordance with the Eastbourne Core Strategy Local Plan, which sets out the overarching policy direction for Eastbourne	The Eastbourne Town Centre Local Plan confirms that the five Development Opportunity Sites will deliver a minimum of 450 net residential units and new Use Class B1(a) office space (now known as Use Class E), the quantum of which will be confirmed in the Employment Land Local Plan (as confirmed below, this was 3,750 sqm).

⁴¹ [Mid Sussex District Council Site Allocations Development Plan Document](#)

⁴² [Eastbourne Core Strategy Local Plan \(adopted February 2013\)](#)

⁴³ [Eastbourne Town Centre Local Plan \(adopted November 2013\)](#)

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
Eastbourne Employment Land Local Plan ⁴⁴ (adopted November 2016)	The Eastbourne Employment Land Local Plan is a document that seeks to guide job growth and economic development in Eastbourne up to 2027 as well as identifying an appropriate supply of land for future employment development. This Plan specifically relates to land and buildings within Use Class B1 (now Use Class E), B2 and B8.	The Eastbourne Employment Land Local Plan has a new requirement for employment floorspace of 48,750 sqm to be delivered by 2027. The employment floorspace was to be distributed through the intensification of existing industrial estates (21,875 sqm), the town centre (3,750 sqm) and Sovereign Harbour (23,125 sqm).
Lewes District Local Plan Part 1 ⁴⁵ (adopted May 2016)	The Lewes District Local Plan Part 1 is the main strategic planning document for the area, which covers the whole of Lewes District (including the South Downs National Park) and has been prepared to guide new development and change in the district for the period up to 2030.	The Lewes District Local Plan (Part 1) states that a minimum of 6,900 net additional dwellings will be provided between 2010 and 2030 in the district. For employment, the Plan provides for 74,000 sq. metres of employment floorspace (B1 (now Use Class E), B2 and B8) in the district.
Lewes District Local Plan Part 2. Site allocations and Development Management Policies ⁴⁶ . (adopted February 2020)	The Lewes District Local Plan Part 2 seeks to deliver the strategic objectives and spatial strategy of the Local Plan Part 1 by allocating additional sites to meet the development growth identified in the Local Plan Part 1 and setting out detailed (non-	The Plan only allocates additional sites to meet the development growth already identified in Local Plan Part 1 (outside of the National Park).

⁴⁴ [Eastbourne Employment Land Local Plan \(adopted November 2016\)](#)

⁴⁵ [Lewes District Local Plan Part 1 \(adopted May 2016\)](#)

⁴⁶ [Lewes District Local Plan Part 2 \(adopted February 2020\)](#)

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
	<p>strategic) development management policies to guide development.</p> <p>The Plan only applies to the area of Lewes District covered by the Lewes District Planning Authority (i.e. excluding the area within the South Downs National Park)</p>	
South Downs Local Plan ⁴⁷ (adopted July 2019)	The South Downs Local Plan sets out the vision and policies for the South Downs National Park Area for the period from 2014 to 2033.	<p>The South Downs Local Plan makes provision for approximately 4,750 net additional homes between 2014-2033.</p> <p>The Plan makes provision for approximately 5.3 hectares of office space, 1.8 hectares of industrial space and 3.2 hectares of small-scale warehousing between 2014-2033.</p>
Tandridge District Core Strategy ⁴⁸ (adopted October 2008)	The Tandridge District Core Strategy is the main strategic planning document for the area, which covers Tandridge District and has been prepared to guide new development and change in the district for the period up to 2026.	The Tandridge District Core Strategy states that a minimum net increase of at least 2,500 dwellings will be built in the period 2006 to 2026.

⁴⁷ [South Downs Local Plan \(adopted July 2019\)](#)

⁴⁸ [Tandridge District Core Strategy \(adopted October 2008\)](#)

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
Tandridge Local Plan Part 2: Detailed Policies ⁴⁹ (adopted July 2014)	The Tandridge Local Plan Part 2: Detailed Policies supports the adopted Core Strategy and contains a set of detailed planning policies to be applied locally in the assessment and determination of planning applications over the plan period (2014 -2029).	The Tandridge Local Plan Part 2: Detailed Policies only seeks to review more detailed development management policies and does not contain strategic targets for the quantum of development in the district or seek to allocate sites for development so is not likely to cause significant 'in-combination' effects.
Brighton and Hove City Plan Part One ⁵⁰ (adopted March 2016)	The purpose of the Brighton and Hove City Plan – Part One is to provide the overall strategic and spatial vision for the future of Brighton and Hove through to 2030. It will help shape the future of the city and plays important role in ensuring that other citywide plans and strategies achieve their objectives.	The Brighton and Hove City Plan - Part One states that the Council will make provision for at least 13,200 new homes to be built over the plan period (2010 – 2030). The Plan provides for between 100,500 to 105,500 sqm of new employment floorspace and 25,000sqm of new retail floorspace. There are a number of strategic allocations for both employment and retail within the adopted Plan.
Brighton and Hove City Plan Part Two ⁵¹ (adopted October 2022)	The aim of the Brighton and Hove City Plan - Part Two is to support the implementation and delivery of City Plan Part One, including allocating additional	The Plan states that it will make overall provision for a minimum of 3,600 dwellings and 522 student dwellings during the Plan period, alongside some

⁴⁹ [Tandridge Local Plan Part 2: Detailed Policies \(adopted July 2014\)](#)

⁵⁰ [Brighton and Hove City Plan Part 1 \(adopted March 2016\)](#)

⁵¹ [Brighton and Hove City Plan Part 2 \(adopted October 2022\)](#)

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
	sites and setting out development management policies to guide new development to 2030.	allocations for employment and commercial floorspace.
Sevenoaks Core Strategy ⁵² (adopted February 2011)	The Sevenoaks Core Strategy sets out the vision and policies for the future development in the district over the period to 2026 as well as providing the policy context for other Development Plan Documents.	The Sevenoaks Core Strategy plans to provide 3,300 additional dwellings over the Plan period from 2006 to 2026.
Sevenoaks Allocations and Development Management Plan ⁵³ (adopted February 2015)	The Sevenoaks Allocations and Development Management Plan supports the adopted Core Strategy and contains a set of detailed planning policies to be applied locally in the assessment and determination of planning applications over the plan period (2006 -2026). The document also includes allocations for housing, mixed use development and employment development.	The Sevenoaks Allocations and Development Management Plan supports the Core Strategy and states that the Council can demonstrate a housing land supply of 4,282 dwellings for the plan period of 2006-2026 (this is higher than the Core Strategy). The Plan also seeks to allocate a grand total of 75.5 hectares of employment land largely within Sevenoaks, Swanley and Edenbridge.
Crawley Borough Local Plan 2024 – 2040	The Crawley Local Plan (2024-2040) set out the vision and policies for the future development in the borough over the Plan period, as well as providing	The Crawley Borough Local Plan (2024-2040) now carries 'full weight' in terms of planning decisions following its adoption in October 2024. The Plan states that a minimum of 5,330 (net) dwellings will

⁵² [Sevenoaks Core Strategy \(adopted February 2011\)](#)

⁵³ [Sevenoaks Allocations and Development Management Plan \(adopted February 2015\)](#)

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
(adopted 16 October 2024) ⁵⁴	allocations for both residential and employment land.	be built within the borough in the period between 2024 to 2040. This includes several key housing sites. For employment, the Plan provides for approximately 26.2 hectares of new business land in the borough.
East Sussex, South Downs and Brighton and Hove Waste and Minerals Plan ⁵⁵ (adopted February 2013)	The East Sussex, South Downs and Brighton and Hove Waste and Minerals Local Plan (2013) sets out the vision and strategic policy decisions for specific sites to cater for unmet waste needs within the County and the safeguarding of mineral resources up to 2030.	This Plan identifies a series of waste and mineral sites across East Sussex and Brighton and Hove, which are to be safeguarded, as well as allocations for new opportunities and expansion of existing sites. A number of sites are located within Wealden District.
East Sussex, South Downs and Brighton and Hove Waste and Minerals Sites Plan ⁵⁶ (adopted February 2017)	The East Sussex, South Downs and Brighton and Hove Waste and Minerals Sites Plan (2017) provides the spatial details for the requirements contained within the Waste and Minerals Plan that was adopted in 2013. The Sites Plan identifies potential locations for the future waste facilities and safeguards existing waste and minerals resource.	The Plan identifies a series of waste and minerals sites across East Sussex and Brighton and Hove, which are to be allocated for waste management development that includes land at Lower Dicker and Hailsham. The Plan also safeguards land for mineral extraction, which includes land at Horam (Horam Brickworks) and Ninfield (Little Standard Hill Farm).

⁵⁴ [Crawley Borough Local Plan 2023 to 2040 \(adopted October 2024\)](#)

⁵⁵ [East Sussex, South Downs and Brighton and Hove Waste and Minerals Plan \(adopted February 2013\)](#)

⁵⁶ [East Sussex, South Downs and Brighton and Hove Waste and Minerals Sites Plan \(adopted February 2017\)](#)

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
<p>East Sussex, South Downs and Brighton and Hove Waste and Minerals Local Plan – Revised Policies⁵⁷</p> <p>(Adopted ESCC and SDNPA July 2024. Adopted BHCC October 2024)</p>	<p>The East Sussex, South Downs and Brighton and Hove Waste and Minerals Local Plan – Revised Policies document updates planning policy for the production of minerals safeguarding minerals facilities and minerals in East Sussex and Brighton & Hove.</p>	<p>Policy changes are proposed to the existing Waste and Minerals Local Plan and the Waste and Minerals Site Plan were incorporated on this Plan. There are two key changes: East Sussex and Brighton & Hove are to become more reliant on aggregates from the marine sources and other sources outside of the Plan Area and secondly, the revised policies will provide increased protection for minerals and minerals related infrastructure against inappropriate development being located nearby.</p>
<p>West Sussex Joint Minerals Local Plan⁵⁸</p> <p>(Adopted July 2018 and Partial Review, March 2021)</p>	<p>The Minerals Local Plan covers the period to 2033 and sets out the vision and strategic objectives associated with minerals supply developments in West Sussex and within the South Downs National Park when located within West Sussex. It provides the basis for making consistent land-use planning decisions about planning applications for minerals production facilities including quarries.</p>	<p>The Minerals Local Plan allocates strategic minerals sites for clay, soft sand, chalk and stone in West Sussex amongst other matters. Following a Soft Sand Review of the plan, formal revisions were adopted in March 2021, which allocated four sites to help meet the need for soft sand and brick making clay.</p>

⁵⁷ [East Sussex, South Downs and Brighton and Hove Waste and Minerals Plan - Revised Policies \(Proposed Submission for Examination - May 2022\)](#)

⁵⁸ [West Sussex Joint Minerals Local Plan \(adopted July 2018\)](#)

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
West Sussex Waste Local Plan ⁵⁹ (adopted April 2014)	West Sussex County Council and South Downs National Park Authority have worked in partnership on the preparation of the West Sussex Waste Local Plan. The Plan covers the period to 2031 and is the most up-to-date statement of the authorities' land-use policy for waste. There was a five-year review of the Plan in 2019, but this concluded that there was no requirement to update the Plan.	This Plan identifies a series of waste sites across West Sussex which are to be safeguarded, as well as allocations for new opportunities and expansion of existing sites. There are five sites allocated for new built waste management facilities (including for inert waste recycling) at Ford, Climping, Chichester, Horsham and Goddards Green.
Other Neighbourhood Development Plans (NDPs)	The aim of these documents is to provide specific planning policies for designated Neighbourhood Development Plan areas (usually Parishes) and should support the respective Local Plans of the districts and boroughs they are located in.	The Neighbourhood Development Plans, once 'made' should, comply with the respective Local Plans of the districts and boroughs mentioned above and therefore these documents should not cause 'in combination' effects over and above the district level plans.

⁵⁹ [West Sussex Waste Local Plan \(adopted April 2014\)](#)

Appendix 5: Natural England Response

Date: 18 November 2025
Our ref: 530586
Your ref: Hailsham Neighbourhood Plan



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
T 0300 060 3900

[REDACTED]
Wealden District Council

BY EMAIL ONLY
[REDACTED]

Dear [REDACTED]

Hailsham Neighbourhood Plan - Review - HRA Screening Consultation

Thank you for your consultation on the above dated 16 October 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: [REDACTED]

Yours sincerely

[REDACTED]
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, [National Parks \(England\)](https://www.gov.uk/government/publications/national-parks-in-england), **National Trails**, **Priority Habitat Inventory**, **public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](http://www.local-environmental-records-centres.org/).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.