Hailsham Neighbourhood Plan
Addendum to Basic Conditions Statement
May 2021

Introduction

On 25 March 2026 various provisions of the Levelling Up and Regeneration Act (LURA) came into force. These include new text in respect of Section 38B of the Planning and Compulsory Purchase Act 2004 which states:

(2B) So far as the qualifying body considers appropriate, having regard to the subject matter of the neighbourhood development plan, the plan must—

(a) be designed to secure that the development and use of land in the neighbourhood area contribute to the mitigation of, and adaptation to, climate change, and

(b) take account of any local nature recovery strategy, under section 104 of the Environment Act 2021, that relates to all or part of the neighbourhood area, including in particular—

(i) the areas identified in the strategy as areas which—

(A)are, or could become, of particular importance for biodiversity, or

(B)are areas where the recovery or enhancement of biodiversity could make a particular contribution to other environmental benefits,

(ii)the priorities set out in the strategy for recovering or enhancing biodiversity, and

(iii)the proposals set out in the strategy as to potential measures relating to those priorities.

This addendum to the Hailsham Neighbourhood Plan Basic Conditions Statement has been prepared to consider these changes.

It is to be noted that:

- Work on the Neighbourhood Plan was undertaken in advance of the changes being introduced, with the Regulation 14 consultation being complete by the 9th of March.
- None of the responses received to consultation, including those from the statutory consultees (including the County and District Councils) refer to or comment on the changes being introduced through the LURA.
- The changes are prefixed with text stating 'so far as the qualifying body considers appropriate, having regard to the subject matter of the neighbourhood plan…' which affords the qualifying body (in this case, Hailsham Town Council) considerable latitude in terms of how the text is considered and interpreted.
- The emerging Wealden Local Plan includes an extensive suite of policies in respect of climate change and nature recovery, which the Neighbourhood Plan does not duplicate. Indeed, these are reflected as appropriate in the policies and wider project ideas taken forward (as discussed in the Basic Conditions Statement)

- The Local Nature Recovery Strategy (LNRS) of relevance to the Plan area (East Sussex and Brighton & Hove) has not yet been adopted. A draft of this was consulted upon in November 2025 but had not been finalised by the time the submission version of the Neighbourhood Plan was being prepared. At the time of writing the final version remains outstanding.

Notwithstanding the above, this addendum to the Basic Conditions Statement has been prepared for the purposes of comprehensiveness, indicating alignment between the Neighbourhood Plan and the changes introduced through the LURA.

Climate change – Part 2B(a)

The Basic Conditions Statement makes clear how the Neighbourhood Plan considers and responds to climate change. Section 2 outlines how the Neighbourhood Plan aligns with the NPPF (2024), particularly in respect of Section 14 (Meeting the challenge of climate change, flooding and coastal change), Section 15, (Conserving and enhancing the natural environment), and Section 11 (Making effective use of land).

The Neighbourhood Plan includes policies and wider projects in respect of:

- Design principles to encourage and support sustainable and energy efficient development (Policy HaHD3)
- Flood risk (Policies HaGI5 and HaGI6)
- Biodiversity (Policy HaGI1)
- The diversification of existing green spaces (Policy HaGI3)
- The Pevensey Levels (Policy HaGI4)
- The efficient use of land (in Policies HaHD1, HaHD2 and HaTC1)
- Street greening initiatives to improve resilience to climate change (as set out in Policy HaTC5 and Project SGI-01)
- Retrofitting of the roofscape to incorporate green and blue infrastructure, and opportunities for renewable energy generation (Policy HaTC7)

All of the above are set in the context of climate change and seek to respond to that.

Furthermore, the Plan includes policies that encourage active and sustainable travel, which plan for well-integrated development that facilitates walking and cycling, and provision of services and facilities in close proximity of the home. These are all intended to reduce the need for travel by motorised vehicle and thus help contribute to a reduction of the carbon footprint.

The Plan includes numerous references to the importance of and need to plan for climate change. Indeed, it makes clear in the introduction that increasing awareness of the impacts of climate change is one of the reasons that contributed towards the need to review the earlier 'made' Neighbourhood Plan. The overarching concept of Hailsham as a 'ten-minute town' embeds an approach to climate change which acts as a golden thread throughout the Plan.

The Town Council is of the view that the Neighbourhood Plan satisfies Part 2B(a) of the text introduced through the LURA in respect of climate change.

Nature Recovery – Part 2B(b)

The draft LNRS for East Sussex and Brighton & Hove (which covers Wealden and thus Hailsham) was consulted upon in November 2025. It has yet to be finalised, with consultation responses still being considered.

The emerging Local Plan, at Policy NE1, sets out the policy approach to Biodiversity, Geodiversity and Nature Recovery, and which references the emerging LNRS. The Neighbourhood Plan does not seek to duplicate this, but does align with it. In Section 8 of the Neighbourhood Plan, reference is made to Nature Recover Networks, creating net gains for wildlife and biodiversity, avoiding habitat loss and fragmentation, and taking opportunities to improve conditions, creating connected corridors and enhancements to existing green space. This is very much aligned with the purpose of and strategies emerging in the LNRS, including the principles set out within it. For example:

- Principle 2 seeks to create a network of bigger, better, more joined-up wildlife rich spaces across rural and urban landscapes. This is reflected in Policy HAGI1 and associated Figure 24 of the Neighbourhood Plan which identifies a series of important town-wide green and blue corridors, and is supplemented by other opportunities for street greening and diversification of existing green spaces.
- Principle 7, which seeks to bring nature into everyday life, providing places for people to benefit from and engage with nature. This is reflected in Policy HaGI2 of the Neighbourhood Plan which seeks to improve access to green and blue infrastructure, recognising that current provision of and access to green infrastructure in Hailsham is limited, but where any new access should be sensitive to context and character.

The Local Habitats Map, which forms part of the LNRS, identifies areas of importance for biodiversity which, in Hailsham, include the Pevensey Levels and, to the west (outside of the Plan area), Abbots Wood. It also identifies areas that could become important for biodiversity. These include the fringes of the Pevensey Levels, the Cuckoo Trail, river corridors and existing green spaces within the built-up area. These are all recognised as important in the Neighbourhood Plan, with Policy HaGI1 for example setting out the approach to biodiversity, green and blue corridors.

For Hailsham, the following measures and opportunities are identified on the Local Habitats map.

- Increasing habitats in existing green spaces. This is reflected in the Neighbourhood Plan through Policy HaGI3 which supports proposals and opportunities that are taken to diversify and improve existing amenity space. Project SG-01 also supports street greening initiatives across Hailsham, including those which create ‘B-lines’ that allow pollinators to extend their range.
- Creation of new habitats adjacent to the Pevensey Levels. This is referenced in the emerging Local Plan, at Policy NE1 for example, which notes the importance of extending and buffering designated sites. This is not repeated in the Neighbourhood Plan, albeit Policy HaGI4 seeks to maintain and enhance the natural environment of the Pevensey Levels, and supports opportunities for connecting habitats.

- Create and enhance habitats along the Cuckoo Trail. This is reflected in the Neighbourhood Plan in Policy HaM2 which seeks to conserve and enhance biodiversity, including the potential for connecting habitats and reconnecting missing sections of the Cuckoo Trail through provision of new green infrastructure.
- Renaturalise rivers and floodplains, and enhance river habitats. This is reflected in the Neighbourhood Plan in Policy HaGI1 and associated Figure 24 which identifies important town-wide 'green corridors', including those along the River Cuckmere. The supporting text notes the importance of corridors along wetland environments, noting that efforts should be made to protect and, as appropriate, restore habitats. Equally, Policy HaHI4 specifically refers to maintaining and enhancing the environment and habitats associated with the Pevensey Levels. Furthermore, Policy HaGI5 refers to buffer strips alongside watercourses for natural flood management, as well as taking opportunities to restore functional floodplains and retain and enhance watercourses and their biodiversity.
- Enhance and create new areas of woodland. Opportunities for enhancement and creation identified on the Habitats map are primarily located outside of the existing built-up area. However, Policy HaGI1 of the Neighbourhood Plan requires development to avoid fragmentation of green infrastructure, and to enhance this where appropriate. This includes safeguarding existing trees and hedgerows, and incorporating new tree planting.

The Town Council is of the view that the Neighbourhood Plan satisfies Part 2B(b) of the text introduced through the LURA in respect of Nature Recovery.