Habitats Regulations Assessment (HRA)

Screening Report

Wadhurst Neighbourhood Plan (Pre-Regulation 14)

October 2022

Prepared by Wealden District Council

1. Introduction

1.1 This Habitats Regulations Assessment (HRA) screening report has been undertaken by Wealden District Council in respect of the draft Wadhurst Neighbourhood Plan dated 15 August 2022 (Pre-Submission Regulation 14), which has been produced by Wadhurst Parish Council.

1.2 The Wadhurst Neighbourhood Plan sets out a vision, objectives and policies covering a plan period up to 2036. The Plan **does not allocate sites for development.**

1.3 The vision of the Wadhurst Neighbourhood Plan is as follows:

> *"Wadhurst Parish will continue to be a collection of friendly and vibrant distinct communities. The Parish will retain and support its rural 'village feel', historic character and heritage. Justifiable, sensitive and sustainable development will be supported, whilst robustly protecting the High Weald Area of Outstanding Natural Beauty. The Parish economy and its popular High Street will be revitalised by improvements to the roads, traffic control, parking and active support of businesses. Sustainable ways of improving travel and leisure activities and facilities, which promote wellbeing, will be sought wherever possible."*

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 2017[2] (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. The most recent amendments to the Habitats Regulations – the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019[3] – make it clear that whilst the UK is no longer a member of the EU, a requirement for Habitats Regulations Assessment will continue.

[1] Habitats Directive 92/43/EEC
[2] The Conservation of Habitats and Species Regulations 2017
[3] The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

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 or Special Protection Area) 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 Wind*[4] 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. The appropriate assessment 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[5]. One of these basic conditions is that the neighbourhood plan must be compatible with EU

[4] People over Wind Ruling 2018
[5] Schedule 4B of the Town and Country Planning Act 1990

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 There is no statutory method for undertaking a Habitats Regulation Assessment (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. 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 Wadhurst NDP is not directly connected with or necessary to the management of a European site / Ramsar Site. As a consequence, the Plan 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;
- Hastings Cliffs SAC;
- Dungeness, Romney Marsh and Rye Bay SPA and Ramsar site;
- Dungeness SAC.

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

6.1 Appendix 2 provides a summary of the information conserved as part of the screening process.

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 3 provide 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 Wadhurst NDP only guide the type and form of development taking place. It does not allocate land for a specific purpose and it does not propose location or scale of development.

8. Scope of the Screening Assessment

8.1 The HRA screening exercise undertook an exercise to identify European / international sites using an initial 20km radius around Wadhurst Parish with

the aim of screening the plan to identify whether it could result in a likely significant effect.

8.2 All sites located further than 20km from Wadhurst Parish were not considered further taking into account impact pathways and distance being beyond 20km. The European sites located beyond 20km and therefore screened out of the assessment included the following.

- Lewes Downs SAC;
- Castle Hill SAC;
- Hastings Cliffs SAC;
- Dungeness, Romney Marsh and Rye Bay SPA and Ramsar site;
- Dungeness SAC

8.3 The following sites are located within 20km of the neighbourhood area but were screened out of the assessment on the basis that the Wadhurst Neighbourhood Plan would not result in a likely significant effect on these sites.

- Ashdown Forest SPA;
- Pevensey Levels SAC / Ramsar site.

8.4 Further detail is provided at Appendix 4 as to why these European protected sites were excluded from further assessment at this stage.

8.5 The remaining site and therefore the focus of this screening assessment is Ashdown Forest SAC.

9. Air pollution at Ashdown Forest SAC

9.1 Air quality monitoring has taken place across Ashdown Forest SAC since 2014 and has identified that ambient concentrations measured at Ashdown Forest SAC for both Nitrogen Oxides (NO_x) and Ammonia (NH_3) are currently exceeding the critical level at 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, areas of the SAC are exceeding their critical levels for NO_x, NH_3 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 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 The Council had proposed a new Local Plan to 2028 which sought to deliver 14,228 homes and 22,500 square metres of business floor space (the draft Submission Local Plan was subsequently withdrawn[6]). Considering the effects of that quantum of growth, Natural England was satisfied that this amount of growth would not adversely affect the integrity of Ashdown Forest Special Area of Conservation (SAC) from air quality impacts. 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. The advice is based on the evidence provided, their expert knowledge of the particular characteristics, interest features and management of the designated sites in question and professional judgement.

9.7 Natural England has also 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. Air quality monitoring undertaken by the Council indicates 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 Wadhurst NDP.

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

10.1 The HRA Screening assessment considers whether each of the proposed policies within the draft Wadhurst Neighbourhood Plan is likely to have a significant effect on a protected European site.

[6] Withdrawal of the Wealden Local Plan (2019)

10.2 A number of circumstances where a policy would have no likely significant effect on a European site[7] can be where a policy is:

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;

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.

[7] Habitats Regulations Appraisal of Plans Guidance for Plan-Making Bodies in Scotland. January 2015. David Tyldesley and Associates.

Table 1. Screening Assessment for the Wadhurst Neighbourhood Plan (Pre-Regulation 14).

Ref	Policy	Aim	Significant Effect? (Y/N)
WAD 1	Location of Development	Policy aims to direct development to the most sustainable locations and protect the High Weald AONB. Policy also seeks to designate a number of Green Gaps in order to avoid coalescence between settlements.	**N** This policy does not seek to allocate development but indicates the broad location (i.e. within the development boundary, on brownfield land) where development could be acceptable. The policy does not consider scale or specific location of development. **Reason E**
WAD 2	Meeting Local Housing Needs	Policy seeks to ensure there is a mix of housing in the Parish that addresses local housing need.	**N** This policy does not allocate new housing but influences the mix of future housing only. **Reason B**
WAD 3	Design and Character of Development	Policy seeks to ensure that development is of high quality design, adheres to relevant design guides and reflects the local context and local distinctiveness. The policy sets design criteria.	**N** The policy relates to design of new development and will not by itself lead to development. **Reason B**
WAD 4	Sustainability and Design	Policy seeks to ensure that development	**N**

Ref	Policy	Aim	Significant Effect? (Y/N)
		meets the highest environmental standards in terms of its construction, materials and energy use.	The policy supports sustainable design features. **Reason B**
WAD 5	Conserving Heritage Assets	Policy recognises the important contribution of heritage assets to local character and distinctiveness and aims to conserve, enhance and celebrate them.	**N** The policy intends to conserve and enhance the parish's heritage assets. **Reason A**
WAD 6	Conservation Areas	Policy seeks to preserve and enhance the character of the parish's Conservation Areas and their settings.	**N** The policy intends to preserve and enhance the parish's Conservation Areas. **Reason A**
WAD 7	Safe and Sustainable Movement	Policy seeks to encourage sustainable forms of transport by supporting proposals that enable/ promote active travel.	**N** The policy relates to the design of new development and will not by itself lead to development or other change. **Reason B**
WAD 8	Mitigating Traffic Congestion	Policy seeks to ensure that development proposals fully assess both their potential direct and cumulative impact on the local road network and	**N** Policy seeks to shape design of development in a way that considers and addresses the direct and cumulative impact on the local

Ref	Policy	Aim	Significant Effect? (Y/N)
		actively seek ways to mitigate this.	roads and considers the impact on the safety of non-car users. **Reason B**
WAD 9	Car Parking Provision	Policy seeks to ensure that adequate parking is provided and supports dedicated bicycle parking facilities and electric vehicle charging points.	**N** The policy relates to the design of new development and will not by itself lead to development or other change. **Reason B**
WAD 10	Employment Retention and Local Economy Viability	Policy supports new commercial activity and the expansion of existing commercial activity within the development boundaries subject to certain criteria. It also seeks to safeguard existing businesses by only supporting change of use to an activity that does not provide employment under limited circumstances and not supporting conversion to residential at all along the High Street.	**N** This policy seeks to retain existing businesses and restricts change of use to limited circumstances. It does not allocate land for a specific purpose and it does not consider location or scale. **Reason E**
WAD 11	Supporting Sustainable Rural Tourism	Policy supports sustainable rural tourism subject to criteria.	**N** This policy does not allocate land for development. It provides guidance on the type and form of

Ref	Policy	Aim	Significant Effect? (Y/N)
			development but does not consider scale or location. **Reason E**
WAD 12	Communication Infrastructure Support	Policy supports access to modern high quality communications infrastructure and provides design criteria for apparatus.	**N** New communication infrastructure would not be located in any proximity to a European Site. **Reason C**
WAD 13	Conservation of the Natural Environment, Ecosystems and Biodiversity	Policy seeks to recognise and enhance the multiple benefits of the Parish's green and blue spaces, conserve biodiversity and deliver net biodiversity gains.	**N** The policy intends to protect the natural environment. **Reason A**
WAD 14	Bewl Water Reservoir Area and Associated Public Activities	Policy seeks to protect Bewl Water in terms of its naturalness, beauty and biodiversity but also for its recreational and leisure activities. It supports proposals within Use Classes F2 (b and c) in the Bewl Water area subject to certain criteria.	**N** The policy intends to protect the natural environment. It does not allocate land for a specific purpose however; it does support development of a specific use. The policy does not consider precise location, form or scale of development.

Ref	Policy	Aim	Significant Effect? (Y/N)
			Reason A and Reason E
WAD 15	Protection of Distinctive and Highly Valued Views	Policy seeks to protect highly valued views as identified in the NDP.	**N** The policy intends to protect the natural environment. **Reason A**
WAD 16	Local Green Spaces	Policy seeks to designate ten Local Green Spaces and afford them protection from development other than in very special circumstances.	**N** The policy intends to protect the natural environment. **Reason A**
WAD 17	Protection of Dark Skies	Policy seeks to reduce light pollution and protect dark skies	**N** The policy intends to protect the natural environment. **Reason A**
WAD 18	Important Community Facilities	Policy seeks to safeguard existing community facilities and support their upgrade or expansion subject to certain criteria.	**N** This policy does not allocate land for development. It provides guidance on the type and form of development but does not consider scale or location. **Reason E**

11. Conclusion

11.1 As a result of the assessment in Section 10, we can conclude that the Wadhurst Neighbourhood Plan will, in itself, not result in a 'likely significant effect' on a European site, in particular Ashdown Forest SAC, therefore an Appropriate Assessment is not required.

11.2 A number of the policies within the Screening Assessment seek to support development by confirming acceptability criteria for developments 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, neither do they provide any information in relation to the potential location, quantum, type or scale of development. The policies instead provide a framework to guide development should it be the case that 'windfall' development comes forward. At the Neighbourhood Plan level, the policies are therefore too general to make an assessment (see table and policies in category E).

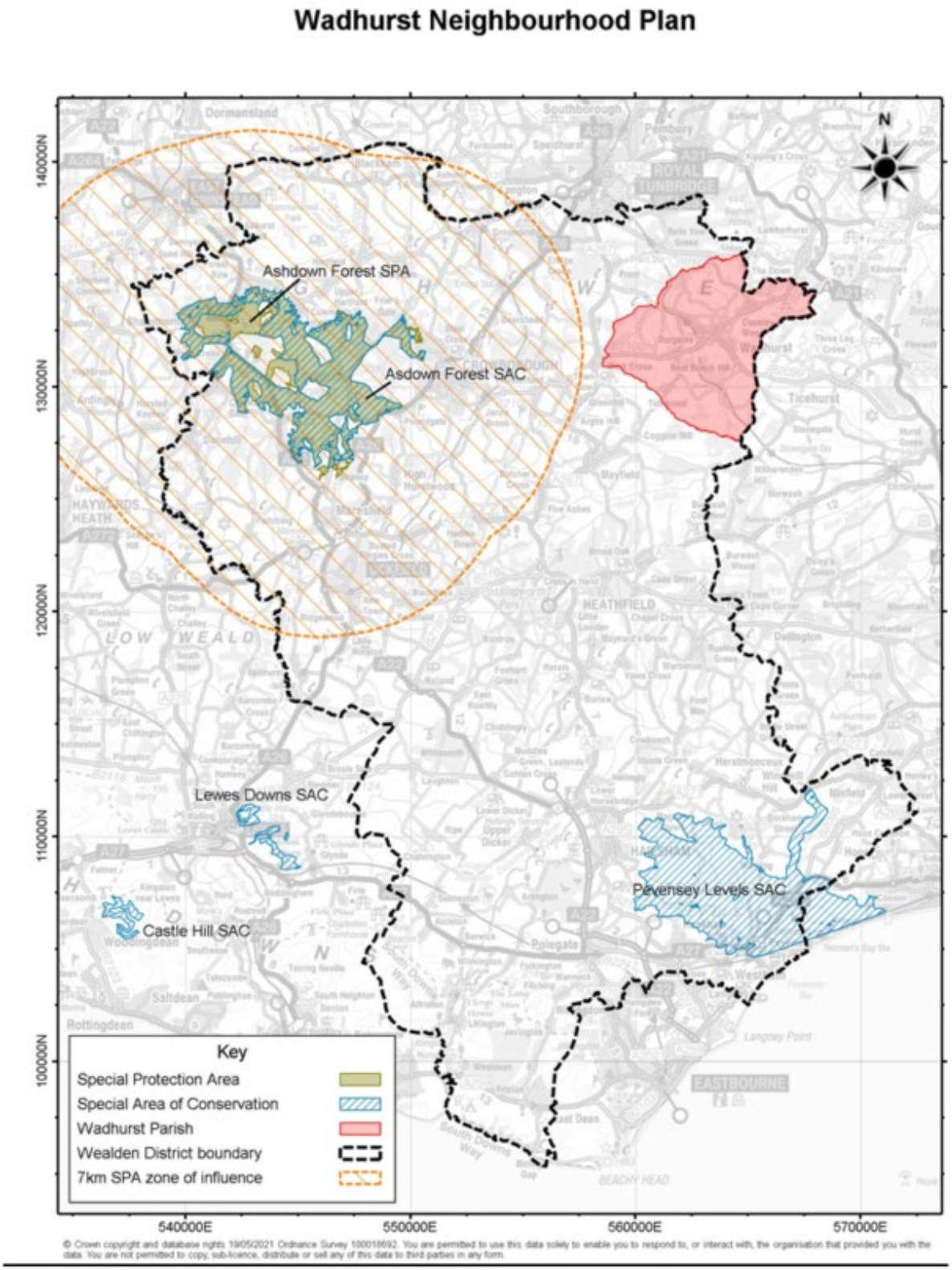
11.3 It is therefore appropriate to rely on the provision in the Habitat Regulations that requires a habitats regulations assessment at a later stage, which in this case would be at the planning application stage, when the exact detail of any proposed development in which to undertake an assessment will be available.

11.4 Based upon the conclusion above an Appropriate Assessment of the Wadhurst Neighbourhood Plan is not required. Wealden District Council consulted Natural England on this report and its conclusion. Their response states:

> "*Natural England agrees with the report's conclusions that the Wadhurst Neighbourhood Plan would not be likely to result in a significant effect on any European Site, either alone or in combination and therefore no further assessment work would be required".*

11.5 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 Neighbourhood Area and nearby European Sites



APPENDIX 2: European and Ramsar Site Information

Site	**Pevensey Levels SAC**
Characteristics of European Site	**Habitat Present** • Inland water bodies (Standing water, running water) (2.5%) • Humid grassland, Mesophile grassland (97.5%)[8] **Other Characteristics** 1 Terrestrial: Soil & Geology: nutrient-poor, clay, alluvium, peat, basic, shingle, sand, mud, sedimentary 2 Terrestrial: Geomorphology and landscape: lowland, coastal, floodplain[9] 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 wildfowl[10].
Qualifying Interests	Special Area of Conservation **Annex I habitats that are a primary reason for selection of this site:**

[8] JNCC Website
[9] Standard Data Form for sites within the 'UK national site network of European sites'
[10] European Site Conservation Objectives: Supplementary advice on conserving and restoring site features.

Site	**Pevensey Levels SAC**
	Not applicable **<u>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</u>** Not applicable **<u>Annex II species that are a primary reason for selection of this site:</u>** 4056 Ramshorn snail *Anisus vorticulus* *Anisus vorticulus* occurs across a range of sites in southern and eastern England. Pevensey Levels is a large and expansive grazing marsh that supports *Anisus vorticulus* in both a wide spatial distribution and in good population density classes[11]. **<u>Annex II species present as a qualifying feature, but not a primary reason for site selection:</u>** Not applicable
Conservation Objectives	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; • The extent and distribution of the habitats of qualifying species • The structure and function of the habitats of qualifying species

[11] JNCC Website

Site	**Pevensey Levels SAC**
	• The supporting processes on which the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site[12].
Current Site Condition	The SSSI is considered to be in 99.5% Unfavourable-Recovering and 0.5% Partially destroyed[13]
Threat to Qualifying Interests	Threats and Pressures <u>Negative</u> • 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) <u>Positive</u> • 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) [14]

[12] European Site Conservation Objectives for Pevensey Levels SAC
[13] This is the latest position from the Natural England website SSSI Condition Summary (August 2022)
[14] Standard Data Form for sites within the 'UK national site network of European Sites'.

Site	**Pevensey Levels SAC**
Factors that could adversely affect the site's ecological character including changes in land (including water) use and development projects	• Introduction / invasion of non-native plant species (of particular relevance is floating pennywort); • Pollution – domestic sewage (sewage treatment works). *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 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.
Key Environmental Conditions to Maintain Site Integrity	The Lesser whirlpool ram's-horn snail *Anisus vorticulus* 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 *Lemna* 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 ditches[15].

[15] European Site Conservation Objectives: Supplementary advice on conserving and restoring site features

Site	**Pevensey Levels SAC**
Relevant Site Management Plans / Statements	**Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Pevensey Levels SAC** The plan identifies a number of priorities, issues and actions in relation to: • Inappropriate water levels; • Invasive species; and • Water pollution[16].

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[17].
Qualifying Interests	Ramsar Criterion 2a The site supports an outstanding assemblage of wetland plants and invertebrates including many British Red Data Book species. Ramsar Criterion 2b

[16] Site Improvement Plan Pevensey Levels
[17] Ramsar Sites Information Service

Site	**Pevensey Levels Ramsar Site**
	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* spp[18].
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 *Potamogeto*n 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 *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 respectively[19]. <u>Noteworthy Flora</u> Nationally important species occurring on the site Higher plants:

[18] Ramsar Information Sheet
[19] Information sheet on Ramsar Wetlands (RIS)

Site	**Pevensey Levels Ramsar Site**
	• *Althaea officinalis* • *Ceratophyllum submersum* • *Crambe maritima* • *Potamogeton acutifolius* • *Potamogeton friesii* • *Potamogeton trichoides* • *Sium latifolium* • *Stratiotes aloides* <u>Noteworthy fauna</u> Nationally important species occurring on the site: Invertebrates • *Segmentina nitida* • *Anisus vorticulus* • *Valvata macrostoma* • *Hydrophilus piceus* • *Gyrinus suffriani* • *Elmatophilus brevicollis* • *Bagous puncticollis*

Site	**Pevensey Levels Ramsar Site**
	• *Dolomedes plantarius* • *Atylotus rusticus* • *Odontomyia ornate* • *Pherbellia argyra* • *Psacadina zernyi* • *Limophalia pictipennis* • *Tipula marginata* • *Placobdella costata* <u>Assemblage of International importance</u> 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 *Odonata*[20].
Adverse Factors affecting the Ecological Character of the Site	• Vegetation succession; • Eutrophication; • Introduction of invasive / exotic species; • Pollution – domestic sewage; • Pollution – fertilisers;

[20] Information Sheet on Ramsar Wetlands

Site	**Pevensey Levels Ramsar Site**
	• Pollution – pesticides/ agricultural runoff; and • General disturbance from human activities
Key Environmental Conditions of Importance in Sustaining the Site Integrity	• 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 • Control of recreational disturbance
Current Site Condition	See above in relation to SAC.
Relevant Site Management Plans/Statements	This is the same as the IPENS for the SAC. Please see above.

Site	**Ashdown Forest SAC**
Characteristics of European Site	N08 – Heath, Scrub, Maquis and Garrigue, Phygrana 60% coverage N19 – Mixed woodland 40% coverage **Other Characteristics**

Site	**Ashdown Forest SAC**
	1 Terrestrial: Soil & Geology: sandstone, acidic, clay, nutrient-poor 2 Terrestrial: Geomorphology and landscape: lowland[21]
Qualifying Interests	Special Area of Conservation (SAC) **<u>Annex I habitats that are a primary reason for selection of this site:</u>** **4010 Northern Atlantic wet heaths with Erica tetralix for which this is considered to be one of the best areas in the United Kingdom.** 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 *Erica tetralix – Sphagnum compactum* wet heath element provides suitable conditions for several species of bog-mosses *Sphagnum spp*., bog asphodel *Narthecium ossifragum*, deergrass *Trichophorum cespitosum*, common cotton-grass *Eriophorum angustifolium*, marsh gentian *Gentiana pneumonanthe* and marsh clubmoss *Lycopodiella inundata*. The site supports important assemblages of beetles, dragonflies, damselflies and butterflies, including the nationally rare silver-studded blue *Plebejus argus*, and birds of European importance, such as European nightjar *Caprimulgus europaeus*, Dartford warbler *Sylvia undata* and Eurasian hobby *Falco subbuteo*. **4030 European dry heaths for which this is considered one of the best areas in the United Kingdom.** The dry heath in Ashdown Forest is an extensive example of the south-eastern H2 *Calluna vulgaris – Ulex minor* community. This vegetation type is dominated by heather Calluna vulgaris, bell heather Erica cinerea and dwarf gorse *Ulex minor*, with transitions to other habitats. It supports important lichen

[21] Standard Data Form for sites within the 'UK national site network of European Sites'

Site	**Ashdown Forest SAC**
	assemblages, including species such as Pycnothelia papillaria. This site supports the most inland remaining population of hairy greenweed Genista pilosa in Britain[22]. **Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:** Not applicable **Annex II species that are a primary reason for selection of this site:** Not applicable **Annex II species present as a qualifying feature, but not a primary reason for site selection:** 1166 Great crested newt[23] *Triturus cristatus* for which the area is considered to support a significant presence.
Conservation Objectives	Natural England published its Conservation Objectives for Ashdown Forest SAC on 27 November 2018 (version 3)[24]. This document updates and replaces an earlier version dated 30 June 2014: 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;

[22] JNCC website
[23] See link below: Great Crested Newt
[24] European Site Conservation Objectives for Ashdown Forest Special Area of Conservation

Site	**Ashdown Forest SAC**
	• 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 • 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 16.59% Favourable condition, 78.42% Unfavourable-Recovering and 4.99% Unfavourable Declining[25]
Threats to Qualifying Interests	Negative • 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) Positive A02 - Modification of cultivation practices (inside site)[26]

[25] This is the latest position according to the Natural England website Designated Sites View (August 2022)
[26] Standard Data Form for sites within the 'UK national site network of European sites'

Site	**Ashdown Forest SAC**
Ecological Requirements of Annex I Habitats and Annex II Species	H4010 Northern Atlantic Wet Heaths Erica *tetralix* – Wet heath is a community that requires acid, nutrient poor soils that are at least seasonally water logged. 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. H4030 European dry heaths – 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 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. Great crested newt - Great crested newts rely on waterbodies for breeding but otherwise they spend much of their lives on land. They 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 oC. 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.

Site	**Ashdown Forest SAC**
Relevant Site Management Plans/ Statements	**Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Ashdown Forest SAC**[27] The plan identifies a number of priorities, issues and actions in relation to: • Change in land management; • Air Pollution: impact of atmospheric nitrogen deposition; • Public Access/Disturbance; and • Hydrological changes.

Site	**Ashdown Forest Special Protection Area (SPA)**
Characteristics of European Site	**Special Protection Area** Ashdown Forest is located in the High Weald of East Sussex in south-east England, where valley mires, heath and damp woodland have developed on soils derived from Hastings Sands (Lower Cretaceous). Once a royal hunting forest, reduced grazing has resulted in the accelerated development of woodland and encroachment of bracken over former heath. Nevertheless, some fine examples of heathland habitats remain, with humid or wet heath predominating, dominated by Heather *Calluna vulgaris*, Bell Heather *Erica cinerea* and Cross-leaved Heath E*. tetralix* in the dampest conditions. Where drier heaths occur they are dominated by heather in association with Gorse *Ulex europaeus* and Dwarf Gorse *U. minor*. Streamsides and mires add further variety, with *Sphagnum* mosses, Cottongrass *Eriophorum* sp., Bog Asphodel *Narthecium ossifragum* and Round-leaved Sundew *Drosera rotundifolia* all

[27] Site Improvement Plan: Ashdown Forest

Site	**Ashdown Forest Special Protection Area (SPA)**
	characteristic plants. The woodlands are also varied, with Birch *Betula* sp. typically establishing first over heath, followed by Oak *Quercus robur*, Willow *Salix* sp. and Pine *Pinus* sp. in places, eventually forming dense and shaded areas with sparse ground flora. Breeding birds of heath, scrub and woodland are associated with the varied mosaic of their respective habitats, distributed over the higher slopes and valleys of the High Weald. Together with the nearby Wealden Heaths SPA and Thames Basin Heath SPA, Ashdown Forest forms part of a complex of heathlands in southern England that support breeding bird populations of European importance.
Qualifying Interests	**Special Protection Area** Ashdown Forest qualifies under Article 4.1 of the Birds Directive by regularly supporting nationally important breeding populations of two Annex 1 species[28] as it is used by 1% or more of the Great Britain population of species of European importance listed in Annex I of the Directive. During the breeding season this includes: **Annex I species/habitats that are a primary reason for selection of this site:** During the breeding season: • Dartford Warbler *Sylvia undata*, 20 pairs representing 2.1% of the breeding population in Great Britain (Count as at 1994). • Nightjar *Caprimulgus europaeus*, 35 pairs representing at least 1% of the breeding population in Great Britain (Two year mean, 1991 & 1992).

[28] Ashdown Forest SPA Citation

Site	**Ashdown Forest Special Protection Area (SPA)**
	The European Commission affords the Dartford Warbler protection under Annex 1 of the Wild Birds Directive because the species is threatened by destruction, fragmentation and degradation of habitats throughout its range, as a result of agricultural intensification, forestry, urban development and fires[29] **Annex I species/habitats present as a qualifying feature, but not a primary reason for selection of this site:** Not applicable **Annex II species/habitats that are a primary reason for selection of this site:** Not applicable **Annex II species/habitats present as a qualifying feature, but not a primary reason for site selection:** Not applicable
Conservation Objectives	Natural England published the Conservation Objective for Ashdown Forest SPA on 21 February 2019[30]. This document updates and replaces an earlier version dated 30 June 2014 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (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 aims of the Wild Birds Directive, by maintaining or restoring; • The extent and distribution of the habitats of the qualifying features

[29] European Commission: The Dartford Warbler
[30] Ashdown Forest SPA Conservation Objectives

Site	**Ashdown Forest Special Protection Area (SPA)**
	• The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The population of each of the qualifying features, and, • The distribution of the qualifying features within the site.
Current Site Condition	See above SSSI data in relation to SAC <u>Dartford Warbler</u> Current Status at Ashdown Forest SPA Dartford warbler numbers within Ashdown Forest declined following the particularly harsh winters of 08-09 and 09-10. However, their population in Sussex is recovering, and a survey by the Sussex Ornithological Society in 2017 found a minimum of 15 territories on Ashdown Forest <u>Nightjar</u> The most recent national Nightjar survey in 2004 indicated 82 churring males were present within the SPA. A survey of selected SSSIs in 2010 found 83 churring males[31]
Threats to Qualifying Interests	<u>Main threats to Dartford Warbler:</u> • Climatic factors • Habitat fragmentation • Lack of or inadequate habitat management • Development pressures

[31] Ashdown Forest SPA Conservation Objectives Supplementary Advice

Site	**Ashdown Forest Special Protection Area (SPA)**
	• Increased levels of disturbance and recreational use affecting breeding productivity • Urbanisation effects such as fly tipping, increased fires, dirt track biking, cat predation. <u>Main threats to Nightjar</u> • Disturbance by humans and recreational activities – Nightjars are ground nesting birds and can be disturbed by humans and dogs that may range into heather dominated areas and may flush birds from their nest. • Loss of nesting habitat – The area of heathland in the UK has undergone a dramatic reduction during the course of this century due to agricultural land claim, afforestation and built development. For example, it is estimated that 40% of England's lowland heathland has been lost since the 1950s. Threats continue from housing and infrastructure developments and where heathland lacks appropriate management, it will become unsuitable as nesting habitat due to invasion by bushes and trees. • Loss of feeding habitat – Nightjars require extensive areas of suitable feeding habitat, especially uncultivated land, therefore the loss of such habitats within a few kilometres of the nesting area may result in the decline in the number of birds. • Decline in food availability – It is possible that a decline in the availability of large insects caused by changes in agriculture (such as the indirect effects of pesticides) and/or climate change, may have affected nightjar populations.
Key Environmental Conditions to Maintain Site Integrity	• Low levels of disturbance • Maintain the extent, distribution and availability of suitable breeding habitat • Low levels of air pollution

Site	**Ashdown Forest Special Protection Area (SPA)**
	• Connectivity between different habitats • Habitat management should retain the open, mosaic structure of lowland wet and dry heath, ensuring all life cycles of heather are present. • Maintain water quality and quantity • Maintain mix of vegetation[32]
Ecological Requirements of SPA Bird Species	The Dartford warbler requires an adequate provision of suitable habitat in relation to extent and distribution. Habitat should include the provision of gorse at a various age and structure amongst a mainly heathland habitat. Invasive scrub and bracken need to be controlled. Scattered European and/or Western gorse (Ulex europaeus and Ulex gallii) cover of 5% is optimal, and should be of a range of ages to provide a continuum of suitable bushes, i.e. dense (6-12 years old) and up to 1.5 m high. Larger blocks of dense gorse have been shown to be especially important during periods of snow, when the birds retreat to them. It also requires an abundance of shrub layer insects. Nightjars feed on seasonally available suitable prey consisting of flying insects (such as moths, beetles and flies), being most active at dusk and dawn and in some circumstances well into the night. The nightjar will travel from nest sites to feed on a range of habitats such as heathland, deciduous or mixed woodland, orchards, diverse plantations, riparian habitats, freshwater wetlands and gardens. The birds will travel an average 3km from the nest site to locate suitable feeding areas, although they can range further. To achieve favourable conservation condition the nightjar requires: • an abundance of night flying insects; • open ground with predominantly low vegetation;

[32] Ashdown Forest SPA Conservation Objectives Supplementary Advice

Site	**Ashdown Forest Special Protection Area (SPA)**
	• bare patches and sparse woodland/scrub cover; • reduction of displacement birds; and • extent and distribution of habitat area.
Relevant Site Management Plans/ Statements	**Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Ashdown Forest SPA**[33] The plan identifies a number of priorities, issues and actions in relation to: • Change in land management; • Air Pollution: impact of atmospheric nitrogen deposition; • Public Access/Disturbance; and • Hydrological changes.

[33] Site Improvement Plan Ashdown Forest

APPENDIX 3: Other Relevant Plans

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
Wealden Core Strategy Local Plan[34] (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 allocation 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/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[35] (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 is not likely to cause significant 'in-combination' effects.
Rother Local Plan Core Strategy[36]	The Rother Core Strategy sets out the Council's vision and objectives that will guide the	The Rother Core Strategy planned for at least 5,700 dwellings (net) and

[34] Wealden Core Strategy Local Plan (adopted February 2013)
[35] Wealden Affordable Housing Delivery Local Plan (adopted May 2016)
[36] Rother Local Plan Core Strategy (adopted September 2014)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
(adopted September 2014)	future pattern and form of development within the district over the Plan period up until 2028.	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[37] (adopted December 2019)	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 Local Plan. This covers Bexhill and villages that are not covered by Neighbourhood Plans.	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 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[38] (adopted June 2010)	The Tunbridge Wells Borough 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 seeks to deliver in the

[37] Rother Development and Site Allocations Local Plan (adopted December 2019)
[38] Tunbridge Wells Borough Core Strategy (adopted June 2010)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
		order of 26,500 sq. metres of comparison retail floorspace to the end of 2017.
Tunbridge Wells Borough Site Allocations Local Plan[39] (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 the 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.
Tunbridge Wells Borough Submission Local Plan 2021[40]	The Tunbridge Wells Borough Submission Plan is currently at Examination. If adopted it will guide development in Tunbridge Wells to 2038.	The Tunbridge Wells Borough Submission Local Plan 2021 seeks to provide a minimum of 12,204 dwellings and 14 hectares of employment land over the plan period.
Mid Sussex District Plan 2014 -2031[41]	The Plan sets out a vision for how Mid Sussex wants to evolve and a delivery strategy	The Mid Sussex District Plan (adopted in March 2018) seeks to provide a

[39] Tunbridge Wells Borough Site Allocations Local Plan (adopted July 2016)
[40] Tunbridge Wells Borough Submission Local Plan 2021
[41] Mid Sussex District Plan 2014-2031 (adopted March 2018)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
(adopted March 2018)	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.	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.
Mid-Sussex District Council Site Allocations Development Plan Document[42] (Adopted June 2022)	The 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 District Plan.	The Site Allocations DPD allocates additional development sites to meet the residual 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[43] (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	The Eastbourne Core Strategy states that a minimum of at least 5,022 dwellings and 55,430 sq. metres of employment land will delivered by 2027

[42] Mid-Sussex District Council Site Allocations Development Plan Document
[43] Eastbourne Core Strategy Local Plan (adopted February 2013)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
	development plan documents are based.	within the built-up area boundary of Eastbourne.
Eastbourne Town Centre Local Plan[44] (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, the quantum of which will be confirmed in the Employment Land Local Plan (as confirmed below, this was 3,750 sqm).
Eastbourne Employment Land Local Plan[45] (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, 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[46]	The Lewes District Local Plan Part 1 is the main strategic planning document for the	The Lewes District Local Plan (Part 1) states that a minimum of 6,900 net

[44] Eastbourne Town Centre Local Plan (adopted November 2013)
[45] Eastbourne Employment Land Local Plan (adopted November 2016)
[46] Lewes District Local Plan Part 1 Joint Core Strategy 2010-2030 (adopted May 2016)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
(adopted May 2016)	area, which covers the whole 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.	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, B2 and B8) in the District.
Lewes District Local Plan Part 2. Site allocations and Development Management Policies[47]. (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 Local Plan Part 1 and setting out detailed (non-strategic) development management policies to guide development. Only applies to the area of Lewes district covered by the Lewes District Planning Authority (i.e. excluding the area within South Downs National Park)	Only allocates additional sites to meet the development growth already identified in Local Plan Part 1 (outside of the National Park)
South Downs Local Plan [48] (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.	The South Downs Local Plan makes provision for approximately 4,750 net additional homes between 2014-2033. The Plan makes provision for approximately 5.3 hectares of office space, 1.8 hectares of industrial and 3.2 hectares of small-

[47] Lewes District Local Plan Part 2 Site Allocations and Development Management Policies.
[48] South Downs Local Plan (adopted July 2019)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
		scale warehousing between 2014-2033.
Tandridge District Core Strategy[49] (adopted October 2008)	The Tandridge District Core Strategy is the main strategic planning document for the area, which covers the 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.
Tandridge Local Plan Part 2: Detailed Policies[50] (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.
Tandridge District: Our Local Plan: 2033[51] (Regulation 22 submission January 2019)	The Regulation 22 version of the Tandridge Local Plan (Our Local Plan 2033) sets out the land use requirements for the Tandridge District up to 2033 in accordance with national policy and guidance.	The draft policies of the Regulation 22 version of the Plan will not have 'full weight' in terms of planning decisions until its adoption. However, the Regulation 22 version of the Tandridge Local Plan is aims to provide 6,056 homes within the Plan

[49] Tandridge District Core Strategy (adopted October 2008)
[50] Tandridge Local Plan Part 2: Detailed Policies 2014-2029 (adopted July 2014)
[51] Our Local Plan 2033 (Regulation 22 submission)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
		period to 2033 and confirms that the Council will support the delivery of at least 15.3ha of B-class employment space and associated sui-generis uses.
Brighton and Hove City Plan Part One[52] (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.
Proposed Submission City Plan Part 2 [53] (Proposed Submission Stage-2020)	The aim of the City Plan Part Two is to support the implementation and delivery of City Plan Part One, including allocating additional sites and setting out development management policies to guide new development to 2030.	The draft policies within the Pre-Submission version of the Plan will not have 'full weight' in terms of planning decisions until its adoption. However, the Plan does demonstrate that it will make overall provision for a minimum of 3600 dwellings and 522

[52] Brighton and Hove City Plan Part One (adopted March 2016)
[53] Proposed Submission City Plan Part Two

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
		student dwellings during the Plan period.
Sevenoaks Core Strategy [54] (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[55] (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 development largely within Sevenoaks, Swanley and Edenbridge.
Crawley Borough Local Plan 2015 – 2030[56] (adopted December 2015)	The Crawley Borough Local Plan sets out the vision and policies for the future development in the Borough over the Plan period from 2015 to 2030 as well as providing a	The Crawley Borough Local Plan states that a minimum of 5,100 net dwellings will be built within the borough in the period 2015 to 2030. For

[54] Sevenoaks Core Strategy (adopted February 2011)
[55] Sevenoaks Allocations and Development Management Plan (adopted February 2015)
[56] Crawley Borough Local Plan 2015-2030 (adopted December 2015)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
	number of residential allocations.	employment, the Plan provides for approximately 23ha of employment land over the early part of the Plan period and as a minimum, an additional 35ha of land for business uses is required over the whole Plan period.
East Sussex, South Downs and Brighton and Hove Waste and Minerals Plan[57] (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[58] (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 the land at Lower Dicker and Hailsham or safeguarded for mineral extraction, which includes land at Horam (Horam

[57] East Sussex, South Downs and Brighton and Hove Waste and Minerals Local Plan (adopted February 2013)
[58] East Sussex, South Downs and Brighton and Hove Waste and Minerals Local Plan. Waste and Minerals Sites Plan (adopted February 2017)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
		Brickworks) and Ninfield (Little Standard Hill Farm).
West Sussex Joint Minerals Local Plan[59] (Adopted July 2018. Partial Review March 2021)	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 where located within West Sussex. It provides the basis for making consistent land-use planning decisions about planning applications for minerals production facilities including quarries.	This Proposed Submission Draft of the Minerals Local Plan allocates strategic minerals sites for clay, soft sand, chalk and stone in West Sussex amongst other matters. The Plan only confirms (at this stage) that allocations for additional minerals sites would include an extension to West Hoathly claypit (clay) and Steyning (soft sand).
West Sussex Waste Local Plan[60] (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.	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	The aim of these documents is to provide specific planning	The Neighbourhood Development Plans, once

[59] West Sussex Joint Minerals Local Plan (adopted July 2018)
[60] West Sussex Waste Local Plan (adopted April 2014)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
Development Plans (NDPs)	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.	'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.

APPENDIX 4 Sites excluded from the assessment and justification

Site	Impact Pathway	Assessment
Ashdown Forest SPA	Disturbance Urbanisation	Wadhurst Neighbourhood 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)
Pevensey Levels SAC and Ramsar Site	Water Quality Hydrology	The Wadhurst Neighbourhood Area is situated outside of the Cuckmere and Pevensey Levels Catchment Area and there would be no potential pathways in terms of surface runoff or wastewater to impact on water quality or hydrology of the SAC.
Lewes Downs SAC	Air Pollution Disturbance	Wadhurst Neighbourhood Area is located over 25km from the Lewes Downs SAC at its closest point. The SAC therefore falls outside of the area where it is considered that an increase in traffic (resulting from new development) could result in likely significant effects.
Castle Hill SAC	Air pollution	Castle Hill SAC is located over 30km from the Wadhurst Neighbourhood Area. The nearest main road is the Falmer Road, which is

Site	Impact Pathway	Assessment
		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 Hydrology	The Hasting Cliffs SAC is located over 25km from the Wadhurst 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. Additionally, it is unlikely that development arising from the Wadhurst 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	Dungeness, Romney Marsh and Rye Bay SPA and Ramsar site are located approximately 28 km from the Wadhurst Neighbourhood Area. Given the distance, development within the Wadhurst Area will not result in adverse air pollution, water quality or hydrological impacts.
Dungeness SAC	Disturbance Air pollution	Dungeness SAC is located over 35 km from the Wadhurst Neighbourhood

Site	Impact Pathway	Assessment
	Hydrology	Area. Given the distance, development within the Wadhurst Area will not result in adverse air pollution, water quality or hydrological impacts.

APPENDIX 5: Natural England Response

Date: 11 October 2022
Our ref: 407452
Your ref: Wadhurst Neighbourhood Plan

[redacted]
Planning Policy
Wealden District Council

BY EMAIL ONLY
planning@wealden.gov.uk

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Crewe
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T 0300 060 3900

Dear [redacted]

Wadhurst Neighbourhood Plan – Review SEA & HRA Screening

Thank you for your consultation on the above dated and received by Natural England on 09 September 2022.

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.

Screening Request: Strategic Environmental Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Neighbourhood Plan
Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

Habitats Regulations Assessment (HRA) Screening
Natural England agrees with the report's conclusions that the Wadhurst Neighbourhood Plan would not be likely to result in a significant effect on any European Site, either alone or in combination and therefore no further assessment work would be required.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

[redacted]
Consultations Team