Habitats Regulations Assessment (HRA)

Screening Report

Ninfield Neighbourhood Plan (Pre-Regulation 14)

May 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 Ninfield Neighbourhood Plan (NP) (Pre-Regulation 14), which has been produced by Ninfield Parish Council.

1.2 The Ninfield NP sets out a vision, objectives and policies covering a plan period up to 2035. The Plan does not allocate sites for development.

1.3 The vision of the Ninfield NP is as follows:

> *"By 2035, Ninfield will have retained its character as a safe vibrant rural parish, protecting its special position between the High Weald AONB and Pevensey levels from inappropriate development whilst supporting small scale development opportunities for community, economic and residential use that meet the needs of its residents in an environmentally-sensitive and sustainable way; Development will have avoided sensitive landscapes and cherished countryside, whilst retaining the area's strong sense of community, green spaces, and thriving natural environment, respecting and preserving the heritage of the Parish."*

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), 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 (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 – make it clear that the need for HRA will continue after the end of the Transition Period.

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 ruling[1], 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 If the screening assessment concludes that a plan or project is likely to have a significant effect upon a European Site, either individually or 'in combination' with other projects, then Under Article 6(3) of the Habitats Directive (92/43/EEC), an appropriate assessment is required. This requirement is set out in the Conservation of Habitats and Species Regulations 2017 (the "Habitats Regulations"), as amended.

2.7 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).

[1] People over Wind ruling 2018

3. Screening Methodology

3.1 This section of the report sets out the methodology that was undertaken for the HRA Screening Assessment for the Ninfield pre-Regulation 14 NP. 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 Ninfield NP is not directly connected with or necessary to the management of a European site. As a consequence, the NP 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; and
- Dungeness, Romney Marsh and Rye Bay SPA and Ramsar site.

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

6.1 Appendix 2 provides a summary of the information considered 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 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 Ninfield NP only guide the type and form of development taking place. It does not allocate land for a specific purpose and it does not identify any locations for growth or scale of development.

8. Scope of the Screening Assessment

8.1 The following sites have been screened out of the assessment on the basis that the Ninfield Neighbourhood Plan would not result in a likely significant effect on these sites, either alone or in combination with other plans and projects. Further information is provided in Appendix 4.

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

8.2 The Pevensey Levels SAC and Ramsar site and the Ashdown Forest SAC are therefore the focus of this screening assessment.

9. Water Quality and Hydrology at the Pevensey Levels SAC and Ramsar site

9.1 Additional new development and increased populations located within the hydrological catchment area of the Pevensey Levels has 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

9.2 Water quality is governed by not only 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 the distribution of habitats and species, and moreover, maintaining the structure, function and supporting processes of those habitats supporting the species.

9.3 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.

9.4 Hooe WwTW serves the Ninfield and Hooe Common, where the treated wastewater from the Hooe WwTW then enters the Waller's Haven. Therefore this WwTW discharges the treated waste water into the Pevensey Levels, in line with the Environmental Permits granted by the Environment Agency.

9.5 The WwTWs at the Hooe treat waste water 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

9.6 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.

9.7 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 whirpool 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.

9.8 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.

9.9 The Ninfield catchment area discharges into the Hooe Wastewater Treatment Works (WwTW), which then discharges the treated wastewater into the Pevensey Levels area. There are a number of additional WwTW located within the hydrological catchment area of the Pevensey Levels, which directly discharges 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 Ninfield's WwTWs. 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.

9.10 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 invested £1.5 million into project that has been upgrading the treatment works at Hooe to remove a greater amount of phosphorous during the treatment process to benefit the habitat and wildlife in the Pevensey Levels.

10. Air pollution at Ashdown Forest SAC

10.1 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 (NOx) and Ammonia (NH3) 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.

10.2 In addition, dispersion modelling across Ashdown Forest SAC has identified that currently, areas of the SAC are exceeding their critical levels for NOx, NH3 and nitrogen deposition.

10.3 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.

10.4 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.

10.5 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.

10.6 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. Considering the effects of that quantum of growth, Natural England is satisfied that this amount of growth will 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.

10.7 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 Ninfield NP.

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

11.1 The HRA Screening assessment considers whether each of the proposed policies within the Ninfield NP is likely to have a significant effect on a protected European site.

11.2 A number of circumstances where a policy would have no likely significant effect on a European site[2] 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.

[2] Habitats Regulations Appraisal of Plans Guidance for Plan-Making Bodies in Scotland, DTA Associates, (2015)

Ref	Policy	Aim(s)	Significant Effect? (Y/N)
NNP Policy 1	Sustainability and Community Resilience	Policy seeks to enable Ninfield to make a contribution to reducing climate change and to build resilience, mitigate effects and exploit beneficial opportunities. The policy re-iterates existing local policy that seeks to locate development within the defined development boundary.	**N** The policy intends to protect the built and natural environment by locating development within the existing development boundary. **Reason A**
NNP Policy 2	Protect and Enhance Dark Night Skies	Policy seeking to reduce light pollution and mitigate the potential impacts of new developments in order to preserve dark skies.	**N** The policy intends to protect the natural environment. **Reason A**
NNP Policy 3	Landscape and Environment	Policy seeks to conserve, protect and enhance landscape character.	**N** The policy intends to protect the natural environment. **Reason A**
NNP Policy 4	Areas of Locally Valued Landscape	Policy seeks to designate areas of local landscape value and provide additional policy protections in these areas. This seeks to ensure that development is not detrimental to the rural character and scenic quality of the area.	**N** The policy intends to protect the natural environment. **Reason A**
NNP Policy 5	Local Green Space	Policy seeks to designate 12 Local Green Spaces.	**N** The policy intends to protect the natural environment. **Reason A**

Ref	Policy	Aim(s)	Significant Effect? (Y/N)
NNP Policy 6	Biodiversity (Blue and Green Infrastructure)	Policy seeks protect and enhance the green and blue infrastructure network in Ninfield, to support net-gains for the biodiversity.	**N** The policy intends to protect the natural environment. **Reason A**
NNP Policy 7	Renewables	Policy seeks to encourage the installation of low carbon and renewable energy measures.	**N** The policy intends to protect the natural environment. **Reason A**
NNP Policy 8	Flood Risk and Drainage	Policy seeks to ensure that surface water drainage for new developments will be based on sustainable drainage principles.	**N** The policy intends to protect the built and natural environment. **Reason A**
NNP Policy 9	Built Heritage	Policy seeks to protect the historic environment and seeks protection for non-designated heritage assets. A local list is included.	**N** Policy intends to protect the historic environment. **Reason A**
NNP Policy 10	Design and Character	The policies setting design criteria.	**N** Policy relates to the design of new development. **Reason B**
NNP Policy 11	Housing Development in the Development Area of Ninfield	Policy seeks to ensure new developments do not adversely affect the landscape and is sympathetic to the existing built setting.	**N** Policy relates to the design of new development. **Reason B**
NNP Policy 12	Housing Mix	Policy seeks to support development of smaller dwellings in Parish.	**N** The policy does not allocate new housing

Ref	Policy	Aim(s)	Significant Effect? (Y/N)
			but influences the mix of future housing. **Reason B**
NNP Policy 13	Communications	Encourages improved broadband infrastructure and mobile phone coverage in the Parish area.	**N** The policy influences new communication infrastructure for developments. **Reason D**
NNP Policy 14	Local Employment	The policy seeks to promote existing and new business development, as well as preventing the loss of existing business within the parish due to change of use applications. The policies seek to encourage additional parking, flexible employment and live work units to support local business.	**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**
NNP Policy 15	Infrastructure	The policy supports new and improved infrastructure in principle, provided that it accords with other policies within the NP.	**N** The policy is unspecific about the types of infrastructure that will come forward. **Reason E**
NNP Policy 16	Community Facilities	The policy will support community facilities that comply with other relevant policies within the NP. Although the facilities listed in the NP will be prioritised.	**N** The policy does not allocate new sites for community facilities. **Reason E**
NNP Policy 17	Safer and More Sustainable Travel	The policy seeks to promote sustainable travel by increasing the attractiveness of walking and cycling.	**N** Policy relates to the design of new development.

Ref	Policy	Aim(s)	Significant Effect? (Y/N)
			Reason B
NNP Policy 18	Parking	The policy seeks to ensure new developments provide adequate parking to meet the standards adopted by East Sussex County Council.	**N** Policy relates to the design of new development. **Reason B**

12. Conclusion

12.1 As a result of the assessment in Section 11, we can conclude that the Ninfield NP 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 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. The policies instead 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 table and policies in category E).

12.3 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 and location of any proposed development in which to undertake an assessment will be available.

12.4 Based upon the conclusion above an Appropriate Assessment of the Ninfield NP is not required. This document will be assessed by Natural England as the relevant statutory consultee.

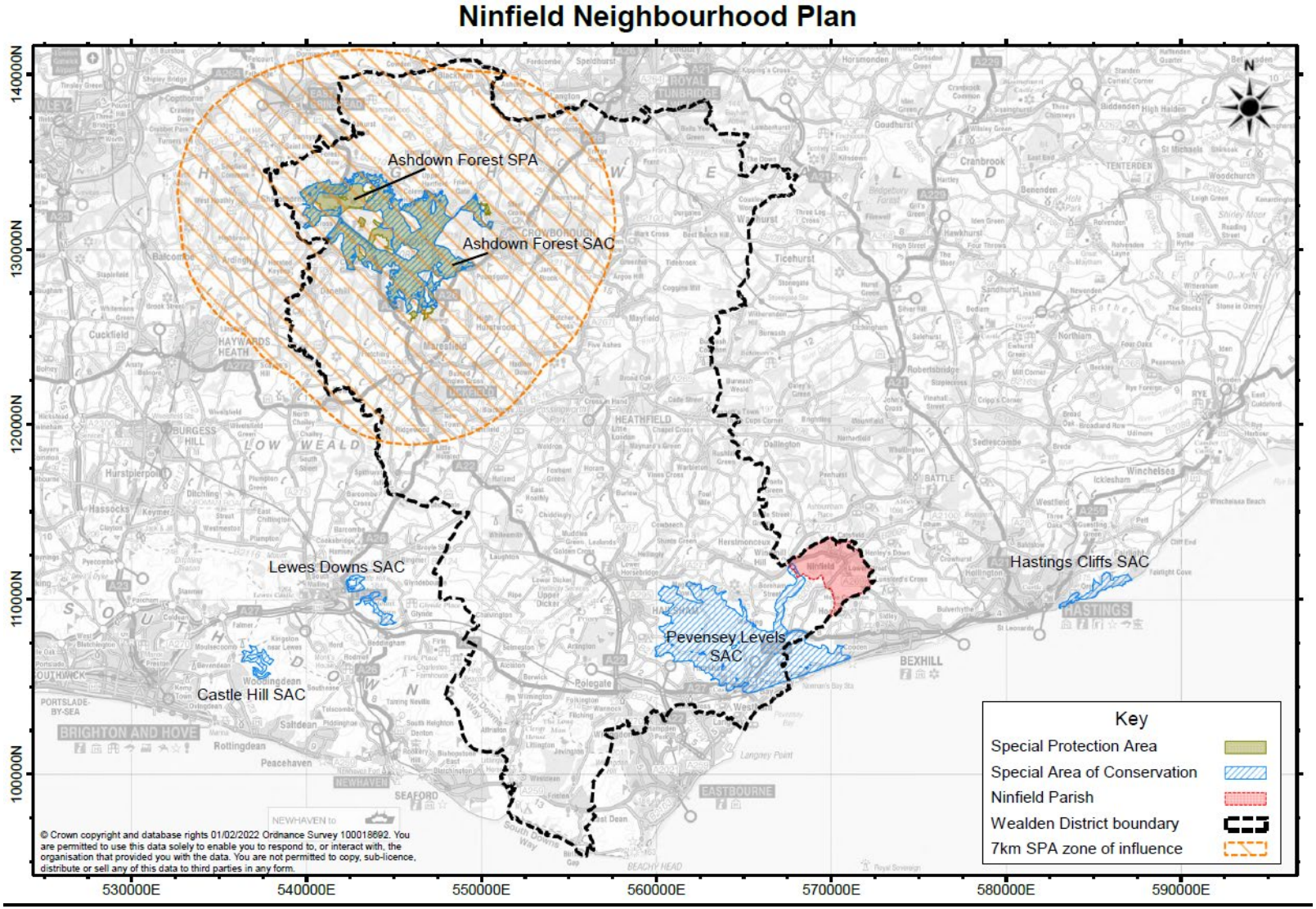
12.5 This screening opinion is considered to be a 'snapshot in time' and if the scope and/or nature contained within the Ninfield NP should change, then a new screening process will need to be undertaken to determine whether an Appropriate Assessment would be required at that time.

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

> *"Natural England welcomes the opportunity to provide comments on the Habitats Regulations. We agree with your conclusion of the report that, the 'Ninfield Neighbourhood Plan will, in itself, not result in a 'likely significant effect' on a European site' and that based upon the conclusion above an Appropriate Assessment of the Ninfield Neighbourhood Plan is not required."*

12.7 Natural England's full response is available at Appendix 4. 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 Plan Area and nearby European Sites



APPENDIX 2: European and Ramsar Site Information

Site	**Lewes Downs Special Area of Conservation (SAC)**
Characteristics of European Site	Heath, Scrub, Maquis and Garrigue, Phygrana (5%) Dry grassland, Steppes (85%) Humid grassland, Mesophile grassland (5%) Improved grassland (5%) **Other characteristics** 1. Terrestrial: Soil & Geology: sedimentary, nutrient-poor, basic 2. Terrestrial: Geomorphology and landscape: valley, slope, lowland
Qualifying Interests	**Annex I habitats that are a primary reason for selection of this site:** 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) This site hosts the priority habitat type "orchid rich sites". This chalk grassland site consists largely of CG2 Festuca ovina-Avenula pratensis and CG3 Bromus erectus calcareous grasslands. This site contains an important assemblage of rare and scarce orchids, including early spider-orchid Ophrys sphegodes, burnt orchid Orchis ustulata and musk orchid Herminium monorchis. The colony of burnt orchid is one of the largest in the UK.

Site	**Lewes Downs Special Area of Conservation (SAC)**
	<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>** Not applicable. **<u>Annex II species present as a qualifying feature, but not a primary reason for site selection:</u>** Not applicable.
Conservation Objectives	The conservation objective is set for each habitat or species of a SAC. Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term 'favourable conservation status' is defined in Article 1 of the Habitats Directive. The conservation objectives for the Lewes Downs Special Area of Conservation were published on 27 November 2018[3]. This updates the earlier version published on 30 June 2014, to reflect the consolidation of the Habitats Regulations in 2017. 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

[3] European Site Conservation Objectives for Lewes Downs Special Area of Conservation.

Site	Lewes Downs Special Area of Conservation (SAC)
	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 qualifying natural habitats The structure and function (including typical species) of qualifying natural habitats, and The supporting processes on which qualifying natural habitats rely This document should be read in conjunction with the accompanying Supplementary Advice document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.
Current Site Condition	The SSSI is considered to be in 95.55% favourable condition and 4.45% unfavourable (recovering) condition.[4]
Threats to Qualifying Interests	Threats and pressures Negative HO4 Air pollution, air-borne pollutants (inside and outside site) FO3 Hunting and collection of wild animals (terrestrial), including damage caused by game etc. (inside site)

[4] Natural England SSSI Condition Summary for Lewes Downs Special Area of Conservation as of October 2021.

Site	**Lewes Downs Special Area of Conservation (SAC)**
	GO1 Outdoor sports and leisure activities, recreational activities (inside site) AO4 Grazing (inside site) <u>Positive</u> AO2 Modification of cultivation practices (inside site) AO4 Grazing (inside site) BO2 Forest and Plantation management & use (inside site) DO5 Improved access to site (inside site)
Key Environmental Conditions to Maintain Site Integrity	Appropriate grazing by sheep and cattle (to conserve and enhance plant species diversity) Absence of encroachment by scrub Absence of leaching Absence of spray-drift from surrounding arable fields Absence of exposure to atmospheric pollutants
Relevant Site Management	**<u>Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Lewes Downs</u>** The plan identifies a number of priorities, issues and actions in relation to: Game management: pheasant rearing

Site	**Lewes Downs Special Area of Conservation (SAC)**
Plans / Statements	Undergrazing Public access / disturbance Air pollution: impact of atmospheric nitrogen deposition The plan can be accessed here: http://publications.naturalengland.org.uk/publication/5857326774878208?category=6149691318206464

Site	**Pevensey Levels SAC**
Characteristics of European Site	Pevensey Levels is one of the largest and least-fragmented lowland wet grassland systems in southeast England. The low-lying grazing meadows are intersected by a complex system of ditches which support a variety of important wetland communities, including nationally rare and scarce aquatic plants and invertebrates. The site also supports a notable assemblage of breeding and wintering wildfowl. A small area of shingle and intertidal muds and sands is included within the site. **Habitat present** NO6 – Inland water bodies (standing water, Running water) (2.5% coverage) N10 – Humid grassland, Mesophile grassland (97.5% coverage) **Other characteristics**

Site	**Pevensey Levels SAC**
	1 Terrestrial: Soil & Geology:nutrient-poor,clay,alluvium,peat,basic,shingle,sand,mud,sedimentary 2 Terrestrial: Geomorphology and landscape: lowland, coastal, floodplain.
Qualifying Interests	Special Area of Conservation **<u>Annex I habitats that are a primary reason for selection of this site:</u>** 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. **<u>Annex II species present as a qualifying feature, but not a primary reason for site selection:</u>** Not applicable

Site	Pevensey Levels SAC
Conservation Objectives	**<u>Special Area of Conservation</u>** The conservation objective is set for each habitat or species of a SAC. Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term 'favourable conservation status' is defined in Article 1 of the Habitats Directive. The conservation objectives for the Lewes Downs Special Area of Conservation were published on 27 November 2018[5]. This updates the earlier version published on 17 September 2018, to reflect the consolidation of the Habitats Regulations in 2017. 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

[5] European Site Conservation Objectives for Pevensey Levels Special Area of Conservation.

Site	Pevensey Levels SAC
	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 site. This document should be read in conjunction with the accompanying Supplementary Advice document (where available), which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.
Current Site Condition	The SSSI is considered to be in 99.5% unfavourable recovering and 0.5% partially destroyed.[6]
Threats to Qualifying Interests	Threats and Pressures Negative H02 - Pollution to groundwater (point sources and diffuse sources) (inside and outside site) I01 - Invasive non-native species (inside and outside site)

[6] Natural England SSSI Condition Summary for Pevensey Levels SAC as of October 2021.

Site	Pevensey Levels SAC
	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)
Factors that could adversely affect the site's ecological character including changes in land (including water) use and	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

Site	Pevensey Levels SAC
development projects	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 my neglect. The main threats to the species include land drainage, inappropriate habitat management and eutrophication, and studies of its requirements and conservation management have been undertaken.
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.
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. The plan can be accessed here:

Site	Pevensey Levels SAC
	http://publications.naturalengland.org.uk/publication/6057793526169600?category=6149691318206464

Site	Pevensey Levels Ramsar Site
Characteristics of European Site	Pevensey Levels is one of the largest and least-fragmented lowland wet grassland systems in southeast England. The low-lying grazing meadows are intersected by a complex system of ditches that support a variety of important wetland communities, including nationally rare and scarce aquatic plants and invertebrates. The site also supports a notable assemblage of breeding and wintering wildfowl. A small area of shingle and intertidal muds and sands is included within the site.
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 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.
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

Site	Pevensey Levels Ramsar Site
	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 *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. <u>Noteworthy Flora</u> Nationally important species occurring on the site Higher plants: Althaea officinalis Ceratophyllum submersum

Site	Pevensey Levels Ramsar Site
	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

Site	Pevensey Levels Ramsar Site
	Bagous puncticollis 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.
Adverse Factors affecting the Ecological	Vegetation succession; Eutrophication;

Site	**Pevensey Levels Ramsar Site**
Character of the Site	Introduction of invasive / exotic species; Pollution – domestic sewage; Pollution – fertilisers; Pollution – pesticides/ agricultural runoff; and
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	**Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Pevensey Levels Ramsar Site** 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 **<u>Other Characteristics</u>** 1 Terrestrial: Soil & Geology: sandstone, acidic, clay, nutrient-poor 2 Terrestrial: Geomorphology and landscape: lowland
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*.

Site	**Ashdown Forest SAC**
	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 assemblages, including species such as Pycnothelia papillaria. This site supports the most inland remaining population of hairy greenweed Genista pilosa in Britain. **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 *Triturus cristatus* for which the area is considered to support a significant presence.
Conservation Objectives	The conservation objective is set for each habitat or species of a SAC. Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term 'favourable conservation status' is defined in Article 1 of the Habitats Directive.

Site	Ashdown Forest SAC
	Natural England published the conservation objective for Ashdown Forest SAC on 27 November 2018[7], updating the earlier version dated 30 June 2014, to reflect the consolidation of the Habitats Regulations in 2017. 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 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.

[7] European Site Conservation Objectives for Ashdown Forest Special Area of Conservation.

Site	**Ashdown Forest SAC**
Current Site Condition	Ashdown Forest SSSI is currently considered to be in 16.59% favourable condition, 78.42% unfavourable recovering condition and 4.99% unfavourable declining condition.[8]
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)
Ecological Requirements of Annex I Habitats and	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

[8] Natural England SSSI Condition Summary for Ashdown Forest SAC as of October 2021.

Site	Ashdown Forest SAC
Annex II Species	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.
Relevant Site Management	**Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Ashdown Forest SAC**

Site	**Ashdown Forest SAC**
Plans / Statements	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. The plan can be accessed here: http://publications.naturalengland.org.uk/publication/5793096570765312?category=6149691318206464

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

Site	**Ashdown Forest Special Protection Area (SPA)**
	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 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	**<u>Special Protection Area</u>** Ashdown Forest qualifies under Article 4.1 of the Birds Directive by regularly supporting nationally important breeding populations of two Annex 1 species 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: **<u>Annex I species/habitats that are a primary reason for selection of this site:</u>** During the breeding season: Dartford Warbler *Sylvia undata*, 20 pairs representing at least 1.3% 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).

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. **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:** 1166 Great crested newt *Triturus cristatus* for which the area is considered to support a significant presence.
Conservation Objectives	The conservation objective is set for each bird feature for the SPA. Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving the aims of the Wild Birds Directive. Natural England published the conservation objective for Ashdown Forest SPA on 21 february 2019, updating the earlier version dated 30 June 2014[9].

[9] European Site Conservation Objectives for Ashdown Forest Special Protection Area.

Site	**Ashdown Forest Special Protection Area (SPA)**
	With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (Qualifying features) 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; 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	Please also see SSSI data presented above for Ashdown Forest SAC. <u>Dartford Warbler – Current Status at Ashdown Forest SPA</u> The Dartford warbler re-colonised Ashdown Forest in 1989 (one pair) and the population at the SPA has since expanded from 28 territories recorded in 1994 to 38 in 2006. No formal surveys have been undertaken since 2006; however, records provided by the Sussex Biodiversity Record centre identified 53 records of possible or probable breeding and 20 records of presence in 2014. <u>Nightjar – Current Status at Ashdown Forest SPA</u>

Site	**Ashdown Forest Special Protection Area (SPA)**
	According to the 2004 survey, Sussex typically holds 5.8% of the UK's nightjars. In regards to Ashdown Forest the nightjar population grew by almost 29% from 1997 – 2004, while the national population increased by 35% between 1992 and 2004. However, there was a decline in the 2005 population by 21.7% based on the 2001 figures. The reasons for this are not known but could relate to weather conditions, survey coverage, or increasing disturbance from visitors or other activities.
Threats to Qualifying Interests	Main threats to Dartford Warbler: Habitat fragmentation Lack of or inadequate habitat management Development pressures Increased levels of disturbance and recreational use affecting breeding productivity Provision of suitable habitat to account for any future changes in the global range of Dartford warbler distribution i.e. from southern Europe to more counties in the UK.
Key Environmental Conditions to Maintain Site Integrity	Main threats to Nightjar: 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.

Site	**Ashdown Forest Special Protection Area (SPA)**
	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. 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.
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

Site	Ashdown Forest Special Protection Area (SPA)
	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; 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** 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. The plan can be accessed here: http://publications.naturalengland.org.uk/publication/5793096570765312?category=6149691318206464

Site	**Castle Hill SAC**
Characteristics of European Site	Castle Hill SAC is one of the best examples in East Sussex of the nationally uncommon chalk grassland habitat. The variation of plant and animal communities with aspect and slope is of special ecological interest. The chalk grassland consists of a mosaic of calcareous semi-natural dry grasslands, notably sheep's-fescue – meadow oat-grass (Festuca ovina – Helictotrichon pratense) grassland and upright brome Bromopsis erecta grassland, as well as the taller tor-grass Brachypodium pinnatum grassland which is valuable for grasshoppers and crickets. Castle Hill's important assemblage of rare and scarce species includes early spider-orchid Ophrys sphegodes and burnt orchid Orchis ustulata. The colony of early spider-orchid is one of the largest in the UK. Castle Hill is located within Brighton and Hove and covers an area of 114.68 hectares. The character of the site includes: N08 - Heath, Scrub, Maquis and Garrigue, Phygrana (5% coverage) N09 - Dry grassland, Steppes (90% coverage) N10 - Humid grassland, Mesophile grassland (5% coverage) <u>Other site characteristics</u> 1 Terrestrial: Soil & Geology: basic, nutrient-poor, sedimentary 2 Terrestrial: Geomorphology and landscape: slope, lowland, valley
Qualifying Interests	**<u>Annex I species/habitats that are a primary reason for selection of this site:</u>**

Site	Castle Hill SAC
	6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) This site hosts the priority habitat type "orchid rich sites". This chalk grassland consists of a mosaic of calcareous semi-natural dry grasslands, notably CG2 *Festuca ovina – Avenula pratensis* grassland, CG3 *Bromus erectus* grassland and CG4 *Brachypodium pinnatum* grassland. Castle Hill's important assemblage of rare and scarce species includes early spider-orchid *Ophrys sphegodes* and burnt orchid *Orchis ustulata*. The colony of early spider-orchid is one of the largest in the UK. **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:** 1654 Early gentian Gentianella anglica
Conservation Objectives	The conservation objective is set for each habitat or species of a SAC. Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation

Site	Castle Hill SAC
	Status for that species or habitat type at a UK level. The term 'favourable conservation status' is defined in Article 1 of the Habitats Directive. Natural England published the conservation objective for Ashdown Forest SAC on 27 November 2018[10], updating the earlier version dated 30 June 2014, to reflect the consolidation of the Habitats Regulations in 2017. 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 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.

[10] European Site Conservation Objectives for Castle Hill Special Area of Conservation.

Site	**Castle Hill SAC**
	This document should be read in conjunction with the accompanying Supplementary Advice document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.
Current Site Condition	Castle Hill SSSI is currently considered to be in 35.20% favourable condition and 64.80% unfavourable recovering condition.[11]
Threats to Qualifying Interests	Threats and pressures: <u>Negative</u> H04 - Air pollution, air-borne pollutants (inside and outside site) A04 – Grazing (inside site) A08 – Fertilisation (inside and outside site) <u>Positive</u> D05 - Improved access to site (inside site) A02 - Modification of cultivation practices (inside site) A04 – Grazing (inside site)

[11] Natural England SSSI Condition Summary for Castle Hill SAC as of October 2021.

Site	**Castle Hill SAC**
Key Environmental Conditions to Maintain Site Integrity	Minimal air pollution; Controlled scrub encroachment; Maintenance of grazing; Absence of direct fertilisation; Absence of nutrient enrichment; Low / controlled recreational pressure; Absence of non-native species; and Absence of leaching and spray-drift of chemicals from bordering arable land
Relevant Site Management Plans / Statements	Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Castle Hill SAC The plan identifies a number of priorities, issues and actions in relation to: Undergrazing; Fertiliser use; and Air pollution: impact of atmospheric nitrogen deposition. The plan can be accessed here: http://publications.naturalengland.org.uk/publication/6241234389565440?category=6149691318206464

Site	Hastings Cliffs SAC
Characteristics of European Site	Hastings Cliffs SAC are an area of actively eroding soft cliff that includes the most southerly exposures of the lower Hastings Beds. The site contains three valleys cut into the strata, which support woodland and scrub habitats with an unusual 'Atlantic' bryophyte flora. Closer to the sea the maritime influence stunts the trees, but other bryophytes become important here, with one species, fragrant crestwort Lophocolea fragrans, at its only south-east England locality. Maritime scrub and coastal heathland are found closer to the cliff edge, with grassland supporting maritime species such as thrift Armeria maritima. The clay cliff slopes are eroding and support a range of habitats from bare ground and flushes to maritime grassland and scrub, reflecting the successional development of vegetation following cliff-falls.Hasting Cliff is located in Hastings Borough and covers an area of 183.72 hectares. The character of the site includes: Coastal sand dunes, Sand beaches, Machair (1%) Shingle, Sea cliffs, Islets (30%) Inland water bodies (Standing water, Running water) (5%) Bogs, Marshes, Water fringed vegetation, Fens (2%) Heath, Scrub, Maquis and Garrigue, Phygrana (13%) Dry grassland, Steppes (8%) Improved grassland (10%) Broad-leaved deciduous woodland (25%) Mixed woodland (1%)

Site	**Hastings Cliffs SAC**
	Inland rocks, Screes, Sands, Permanent Snow and ice (5%)
Qualifying Interests	**Annex I habitats that are a primary reason for selection of this site** **1230 Vegetated sea cliffs of the Atlantic and Baltic Coasts** Hastings Cliffs are an area of actively eroding soft cliff on the south coast of England. They include the most southerly exposures of the lower Hastings Beds. The site contains three valleys cut into the strata, which support woodland and scrub habitats with an unusual 'Atlantic' bryophyte flora. Closer to the sea the maritime influence stunts the trees, but other bryophytes become important here, with one species, Lophocolea fragrans, at its only south-east England locality. Maritime scrub and coastal heathland are found closer to the cliff edge, with grassland supporting maritime species such as thrift Armeria maritima. The clay cliff slopes are eroding and support a range of habitats from bare ground and flushes to maritime grassland and scrub, reflecting the successional development of vegetation following cliff-falls. **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:**

Site	**Hastings Cliffs SAC**
	Not applicable
Conservation Objectives	The conservation objective is set for each habitat or species of a SAC. Where the objectives are met, the site will be considered to exhibit a high degree of integrity and to be contributing to achieving Favourable Conservation Status for that species or habitat type at a UK level. The term 'favourable conservation status' is defined in Article 1 of the Habitats Directive. Natural England published the conservation objective for Ashdown Forest SAC on 27 November 2018[12], updating the earlier version dated 30 June 2014, to reflect the consolidation of the Habitats Regulations in 2017. 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 qualifying natural habitat The structure and function (including typical species) of the qualifying natural habitat, and The supporting processes on which the qualifying natural habitat rely This document should be read in conjunction with the accompanying Supplementary Advice document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

[12] European Site Conservation Objectives for Hasting Cliff Special Area of Conservation.

Site	**Hastings Cliffs SAC**
Current Site Condition	Hastings Cliffs to Pett Beach SSSI is currently considered to be in 61.07% favourable condition and 5.56% unfavourable recovering condition, 18.87% unfavourable no change and 14.5% Unfavourable declining.[13]
Threats to Qualifying Interests	Threats and pressures: Inappropriate coastal management Water Pollution Air Pollution: risk of atmospheric nitrogen deposition
Relevant Site Management Plans / Statements	Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Castle Hill SAC The plan identifies a number of priorities, issues and actions in relation to: Inappropriate coastal management Water pollution; and Air pollution: impact of atmospheric nitrogen deposition. The plan can be accessed here: http://publications.naturalengland.org.uk/file/6205547831361536

[13] Natural England SSSI Condition Summary for Hastings Cliffs to Pett Beach

Appendix 3: 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[14] (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 the 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[15]	This document is the Affordable Housing Delivery Local Plan, which reviews the Wealden District (incorporating the	This Plan only reviews affordable housing policy and does not look to allocate new land for development so will not cause

[14] Wealden Core Strategy Local Plan (adopted February 2013)

[15] Wealden Affordable Housing Delivery Local Plan (adopted May 2016)

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
(adopted May 2016)	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.	any likely significant 'in-combination' effects.
Rother Local Plan Core Strategy[16] (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.

[16] Rother Local Plan Core Strategy (adopted September 2014).

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
Rother District Council Development and Site Allocations Local Plan[17] (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[18]	The Tunbridge Wells Borough Core Strategy is to guide new development	The Tunbridge Wells Core Strategy planned for at least 6,000 dwellings to be provided in the Borough in the period

[17] Rother Development and Site Allocations Local Plan (adopted December 2019).

[18] Tunbridge Wells Borough Core Strategy (adopted June 2010).

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
(adopted June 2010)	and change in the district for the period up to 2026.	2006 to 2026. The Core Strategy also seeks to deliver in the order of 26,500 sq. metres of comparison retail floorspace to the end of 2017.
Tunbridge Wells Borough Site Allocations Local Plan[19] (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

[19] 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
		specific locations for such new development have now been established.
Tunbridge Wells Borough Submission Local Plan 2021[20]	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[21] (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

[20] Tunbridge Wells Borough Submission Local Plan 2021

[21] 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
		single allocation of 25 hectares of land as a high quality business park at Burgess Hill.
Mid Sussex Site Allocations Development Plan Documents [22] (to be adopted Spring 2022)	The Mid Sussex Allocations Development Plan seeks to identify sufficient housing sites to provide a five year housing land supply to 2031. It will also make sure that enough land is allocated to meet identified employment needs.	The Submission Draft Site Allocations DPD recommends allocation of 22 housing sites, 7 employment sites, Science and Technology Park to meet the identified needs set out in the District Plan. It also includes 5 strategic policies required to deliver sustainable development.
Eastbourne Core Strategy Local Plan[23] (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 Eastbourne Core Strategy states that a minimum of at least 5,022 dwellings and 55,430 sq. metres of employment

[22] Mid Sussex Site Allocations Development Plan Documents (to be adopted Spring 2022)

[23] Eastbourne Core Strategy Local Plan (adopted February 2013).

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
	the key strategic Local Plan upon which other development plan documents are based.	land will delivered by 2027 within the built-up area boundary of Eastbourne.
Eastbourne Town Centre Local Plan[24] (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[25]	The Eastbourne Employment Land Local Plan is a document that seeks to guide job growth and economic development in	The Eastbourne Employment Land Local Plan has a new requirement for employment floorspace of 48,750 sqm to

[24] Eastbourne Town Centre Local Plan (adopted November 2013).

[25] Eastbourne Employment Land Local Plan (adopted November 2016).

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
(adopted November 2016)	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.	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[26] (adopted May 2016)	The Lewes District Local Plan Part 1 is the main strategic planning document for the 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	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, B2 and B8) in the District.
Lewes District Local Plan Part 2[27]	The Local Plan Part 2 allocates land for housing, including Gypsy and traveller	The Lewes District Local Plan Part 2 seeks to allocate the residual 1660

[26] Lewes District Local Plan Part 1 (adopted May 2016).

[27] 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
(adopted February 2020)	pitches, and employment. It also sets out detailed planning policies to guide development and change in the period to 2030	dwellings of the Lewes District housing requirement up to 2030 that was not allocated in the Lewes District Local Plan Part 1. It states that 1250 dwellings of these have already been allocated in Neighbourhood Development Plans, with 432 dwellings as completely new allocations. The Local Plan Part 2 does not seek to allocate additional sites for employment purposes, however, it does include a review of the deliverability and suitability of existing employment site allocations and their retention where appropriate.
South Downs Local Plan[28]	The South Downs Local Plan sets out the vision and policies for the South Downs	The South Downs Local Plan states that it will make overall provision for

[28] South Downs Local Plan (adopted July 2019).

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
(adopted July 2019)	National Park Area and will cover the time period 2014 to 2033.	approximately 4,750 net additional dwellings between 2014 and 2033 within the SDNP.
Tandridge District Core Strategy[29] (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[30] (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	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

[29] Tandridge District Core Strategy (adopted October 2008).

[30] Tandridge Local Plan Part 2: Detailed Policies (adopted July 2014)

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
	determination of planning applications over the plan period (2014 -2029).	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[31] (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). There are a number of strategic allocations for both employment and retail within the adopted Plan, but no overall quantum of development has been given.
Brighton and Hove City Plan Part Two[32]	The Pre-Submission Brighton and Hove City Plan Part Two intends to support the implementation of the City Plan Part One	The draft policies within the Pre-Submission version of the Plan will not have 'full weight' in terms of planning

[31] Brighton and Hove City Plan Part One (adopted March 2016).

[32] Brighton and Hove City Plan Part Two Pre-Submission (April 2020)

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
	which covers the period 2016-2030, by complementing the strategic policy framework, identifying and allocating additional development sites and setting out a detailed development management policy framework to assist in the determination of planning applications.	decisions until its adoption. However, the Plan does demonstrate that it will make overall provision for an additional 3800 dwellings and 522 student dwellings during the Plan period. A number of employment sites are also allocated as part of the Plan, although the Plan does not provide an exact overall figure. There are also an additional number of strategic allocations for both employment and residential within the Plan.
Sevenoaks Core Strategy[33] (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	The Sevenoaks Core Strategy plans to provide 3,300 additional dwellings over the Plan period from 2006 to 2026

[33] Sevenoaks Core Strategy (adopted February 2011).

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
	policy context for other Development Plan Documents.	
Sevenoaks Allocations and Development Management Plan[34] (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[35]	The Crawley Borough Local Plan sets out the vision and policies for the future	The Crawley Borough Local Plan states that a minimum of 5,100 net dwellings will

[34] Sevenoaks Allocations and Development Management Plan (adopted February 2015).

[35] Crawley Borough Local Plan 2015 – 2030 (adopted December 2015)

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
(adopted December 2015)	development in the Borough over the Plan period from 2015 to 2030 as well as providing a number of residential allocations.	be built within the borough in the period 2015 to 2030. For 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[36] (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.

[36] East Sussex, South Downs and Brighton and Hove Waste and Minerals Plan (adopted February 2013).

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
East Sussex, South Downs and Brighton and Hove Waste and Minerals Sites Plan[37] (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 Brickworks) and Ninfield (Little Standard Hill Farm).
West Sussex Joint Minerals Local Plan[38] (Adopted July 2018)	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	The Joint 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

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

[38] 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
	National Park where located within West Sussex. Once adopted, it will provide the basis for making consistent land-use planning decisions about planning applications for minerals production facilities including quarries.	were adopted in March 2021 which allocated four sites to help meet the need for soft sand and brick making clay.
West Sussex Waste Local Plan[39] (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.

[39] West Sussex Waste Local Plan (adopted April 2014).

Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
Other Neighbourhood Development Plans in Wealden and within neighbouring authorities. Wealden has three 'made' neighbourhood plans: Herstmonceux[40], Hailsham[41] and Hellingly[42]	The aim of these documents is to provide specific planning policies for designated Neighbourhood Areas (usually Parishes) and should support the respective Local Plans of the districts and boroughs they are located in.	The Neighbourhood Development Plans must be in general conformity with the strategic policies in 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 / borough level plans.

[40] Herstmonceux Neighbourhood Plan (made July 2019)

[41] Hailsham Neighbourhood Plan (made July 2021)

[42] Hellingly Neighbourhood Plan (made July 2021)

Appendix 4 Sites excluded from the assessment and justification

Site	Assessment
Ashdown Forest SPA	Ninfield 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	Ninfield Neighbourhood Area is located over 20km 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, not withstanding the fact that no sites are being allocated in the neighbourhood plan, air quality impacts (derived from new development) within Ninfield Neighbourhood Area is 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 other plans, would increase the numbers of visitors to the site significantly given the distance from the neighbourhood area to the site. It is thus unlikely to have any likely significant effect.
Castle Hill SAC	Castle Hill SAC is located approximately 30km from the Ninfield Neighbourhood Plan area. The nearest main road is the Falmer Road, which is located approximately 400m west of the SAC.

Site	Assessment
	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	Ninfield NA is located some distance (10km at the closest point) from Hastings SAC. The Ninfield NP is not proposing to allocate sites for development and as such is unlikely to lead to indirect impacts relating to increase recreational pressures or changes to water quality. Given the distance from the Hasting Cliffs SAC and the nature Ninfield Neighbourhood Plan it is unlikely that the plan will have any significant effects.
Dungeness, Romney Marsh and Rye Bay SPA and Ramsar site	The marine components of the SPA cover the coastal waters off Bexhill, which is located approximately 2.5km from Ninfield Neighbourhood Area. The only pathway to this area is considered to be marine discharge of treated sewage effluent. The Neighbourhood Plan is not proposing to allocate land for development and therefore will not itself bring forward development that might impact marine discharges. The terrestrial elements of the SPA are located some distance from the Neighbourhood Area and are therefore unlikely to that the plan will have significant effects.

APPENDIX 4: Natural England Response

Date: 27 April 2022
Our ref: 388760

[redacted]@wealden.gov.uk

BY EMAIL ONLY

Customer Services
Hornbeam House
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Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear [redacted]

HRA Screening Opinion– Ninfield Neighbourhood Plan (NP)

Thank you for your email of the 8th April 2022, consulting Natural England on the following document:

- **Ninfield Neighbourhood Plan (NP) - Habitats Regulation Assessment Screening Opinion.**

Natural England welcomes the opportunity to provide comments on the above document and our general and then more detailed advice, is set out below.

Habitats Regulations Assessment (HRA) – screening and appropriate assessment requirements.

Where a neighbourhood plan could potentially affect a 'habitats site', it will be necessary to screen the plan in relation to the Conservation of Habitats and Species Regulations (2017), as amended (the 'Habitats Regulations'). Where likely significant effects are identified, it will be necessary to undertake an appropriate assessment of the neighbourhood plan and, if needed, identify and secure appropriate mitigation measures to ensure the plan does not result in an adverse effect on the integrity of the habitats site.

In accordance with Schedule 2 of The Neighbourhood Planning (General) Regulations 2012 (as amended), a neighbourhood plan cannot be made if it breaches the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017 (as amended).

*A screening exercise should be undertaken if there is any doubt about the possible effects of the plan on the habitats site(s). This will be particularly important if a neighbourhood plan is to progress **before** a local plan and/or the neighbourhood plan proposes development which has not be assessed and/or included in the Habitats Regulations Assessment for the local plan. Where mitigation is necessary to ensure no effects then this will need to be properly assessed via an appropriate assessment.*

It is noted that the Ninfield NP does not allocate specific sites for development. From the information contained within the above consultation document, we, therefore, agree with your conclusion in section 12.1, that, *'…the Ninfield NP will, in itself, not result in a 'likely significant effect' on a European site….'* and (section 12.4) that '*Based upon the conclusion above an Appropriate Assessment of the Ninfield NP is not required.*' However, as noted in section 12.5, if the scope and/or policies within the NP should change in the future (and in particular, if sites are to be allocated for development) the HRA screening process will need to be revisited.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact [redacted] or email [redacted]@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely,

[redacted]

Sustainable Development Adviser – Sussex & Kent Team