

Habitats Regulations Assessment (HRA)
Screening Report
Horam Neighbourhood Plan (Pre-Regulation 14)
May 2023
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 Horam Neighbourhood Development Plan (NDP) (Pre-Regulation 14), which has been produced by Horam Parish Council.
- 1.2 The Horam NDP sets out a vision, objectives and policies covering a plan period up to 2039. The Plan **does not allocate sites for development**.
- 1.3 The vision of the Horam NDP is as follows:

*“The essentially **rural character** of Horam parish and its settlements, which is a primary attribute for local people, is **retained**.”*

*The parish’s landscape character, that reflects its location in the ‘Southern slopes of the High Weald’, with high woodland and tree cover and hedgerows, enclosing generally smaller fields as well as settlements, is retained and enhanced, including through a “**landscape-led**” approach to development.*

*The influence of the Parish’s topography on **the pattern and form of settlements**, on visual linkages with the surrounding countryside, and on the tendency for flash flooding of the Waldron Ghyll, have been recognised and reflected in development proposals.*

*The general “**greenness**” of the Parish, not only the fields and woodlands of its countryside but also in terms of its trees, hedges and green spaces within built-up areas, are retained and enhanced, including by identification of a ‘green infrastructure’ network that **promotes biodiversity and reinforces connections with the surrounding countryside**.*

*Opportunities for **walking, cycling and horse riding**, provided notably by the Cuckoo Trail as well as the Public Rights of Way (PROW) network and highways, continue to be encouraged, including through new and improved links and routes, in ways that increase access to the countryside and to local shops and services.*

*The **distinct identities of individual settlements** have not been further eroded.*

*Horam retains a core of businesses and community **facilities that well serve the surrounding area**, which has been supported by a range of initiatives to encourage their use by both residents and visitors.*

*The nature and mix of development have clearly helped meet **local needs**.*

*The **local vernacular** of building forms and materials has been effectively reflected in new buildings, whilst also contributing to the mitigation of and adaptation to climate change.*

*The **heritage of the parish** has been respected, while references to Horam's historical ties with the railway and the wider parish's ties with iron making and brick making are recognised."*

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

2. Legislation

- 2.1 Under Article 6(3) of the Habitats Directive (92/43/EEC)¹, an appropriate assessment is required, where a plan or project is likely to have a significant effect upon a European Site, either individually or 'in combination' with other projects. This requirement is set out in the Conservation of Habitats and Species Regulations 2017² (the "Habitats Regulations"), as amended.
- 2.2 The UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). The Withdrawal Act retains the body of existing EU-derived law within our domestic law. The most recent amendments to the Habitats Regulations – the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019³ – make it clear that whilst the UK is no longer a member of the EU, a requirement for Habitats Regulation Assessment will continue.
- 2.3 The Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'), transposes the Habitats Directive into UK Law. Regulation 105, provides:

"(1) Where a land use plan –

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of the site,

¹ [Habitats Directive 92/43/EEC](#)

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

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

the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives".

- 2.4 This means that any proposed plan that may affect a European site (Special Area of Conservation or Special Protection Area) must first undergo an assessment to look at its potential impacts applying the precautionary principle. This is to determine if the plan will adversely affect the integrity of the European site(s) concerned. This process is known as a Habitats Regulations Assessment and the first stage considers any likely significant effects (the screening stage).
- 2.5 Following the 2018 *People over Wind*⁴ ruling, mitigation measures cannot be applied at the screening stage in order to rule out likely significant effects and thus prevent the plan progressing to the second stage (appropriate assessment).
- 2.6 Where likely significant effects are identified at the screening stage, the second stage of the HRA process is triggered. The appropriate assessment looks at the implications of a plan for a European site in view of the site's conservation objectives. Furthermore, mitigation measures may be introduced at the appropriate assessment stage to avoid or reduce the effects of a plan on the European site(s). Before a plan may be given effect, the plan-making authority as competent authority must ascertain that it would not adversely affect the integrity of the European site(s).
- 2.7 A neighbourhood plan cannot proceed to referendum or come into legal force without meeting a set of basic conditions as set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990⁵. One of these basic conditions is that the neighbourhood plan must be compatible with EU obligations including the needs to demonstrate that it is not likely to have a significant effect on a European site.

3. Screening Methodology

- 3.1 This section of the report sets out the methodology that was undertaken for the HRA Screening Assessment for the early draft of the Horam NDP (pre-regulation 14 version). 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.

⁴ [People over Wind ruling 2018](#)

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

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

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

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

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

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

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

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

7.1 Plans with potential to create in combination effects include existing/emerging development plan documents in Wealden District and other neighbouring authority areas. This includes other existing and emerging neighbourhood plans. Windfall sites could also have an influence.

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

8. Scope of the Screening Assessment

8.1 The HRA screening exercise undertook an exercise to identify European/international sites using an initial 20km radius around Horam Parish with the aim of screening the plan to identify whether it could result in a likely significant effect.

8.2 All sites located further than 20km from Horam Parish were not considered further taking into account impact pathways and distance being beyond 20km.

The European sites located beyond 20km and therefore screened out of the assessment included the following:

- Hastings Cliffs SAC
- Dungeness, Romney Marsh and Rye Bay SPA and Ramsar Site
- Dungeness SAC
- Castle Hill SAC

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

- Ashdown Forest SPA
- Lewes Downs SAC

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

8.5 The remaining sites and therefore the focus of this HRA screening assessment are:

- Ashdown Forest SAC
- Pevensey Levels SAC and Ramsar Site

9. Air pollution at Ashdown Forest SAC

9.1 Air quality monitoring has taken place across Ashdown Forest SAC since 2014 and has identified that ambient concentrations measured at Ashdown Forest SAC for both Nitrogen Oxides (NO_x) and Ammonia (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.

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

9.3 The qualifying features underpinning the Ashdown Forest SAC designation are the presence of European dry heath, North Atlantic wet heath and great crested newts. The conservation objectives for the SAC can be summarised as ensuring the favourable conservation status of its qualifying features by, amongst other things, maintaining or restoring qualifying habitats.

9.4 Natural England's supplementary advice on conserving and restoring the SAC, linked to the Planning Practice Guidance (PPG), explains that the heathland habitat of the Ashdown Forest is sensitive to changes in air quality. Exceedance of 'critical values' for air pollutants may modify its chemical substrate, accelerating or damaging plant growth, altering its vegetation

structure and composition and causing the loss of typical heathland species. Accordingly, development could result in an impact pathway to the SAC if it contributes to an exceedance in critical values.

- 9.5 The heathland habitat in the Ashdown Forest SAC is vulnerable to atmospheric pollution from several sources including vehicle emissions from motor vehicles. There is a potential impact pathway from increased traffic flows associated with new development on the roads which go through, or run adjacent to, the SAC. Many of the characteristic plants, mosses and lichens of heathland habitats are adapted to nutrient poor conditions and extra input of nitrogen can disadvantage these characteristic species in favour of others with a greater tolerance of higher nitrogen levels.
- 9.6 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 was 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.
- 9.7 Natural England has also advised that where an existing national, regional or local initiative can be relied upon to lead to the reduction in background levels of pollution at a site, the competent authority should assess the implications of a plan or project against an improving background trend. Air quality monitoring undertaken by the Council indicates improvements in vehicle technology will come forward and this is a further consideration in assessing the effects on site integrity of the Ashdown Forest SAC arising from the Horam NDP.

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

- 10.1 Additional new development and increased populations located within the hydrological catchment area of the Pevensey Levels have the potential to impose additional pressure on the conservation status of the Pevensey Levels SAC and Ramsar site through:
- Deterioration of water quality; and
 - Changes in hydrological conditions.

Water Quality

- 10.2 Water quality is governed 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.
- 10.3 Surface water run-off has the potential to be a major source of water pollution. Pollutants reach wetland areas mainly through run-off whereby water flows over impervious surfaces picking up a number of pollutants generated by human activity. Such pollutants can include sediment from construction sites, toxic metals and petroleum wastes from roadways and industrial or commercial areas, nutrients and bacteria from residential areas and nutrients and pesticides from agriculture and gardening activities.
- 10.4 The Cuckmere and Pevensey Levels catchment area is served by a number of Wastewater Treatment Works (WwTW) in Wealden District. Hailsham North WwTW serves the northern part of Hailsham, Horsebridge and several outlying villages including Chiddingly, Hellingly and Lower Dicker. Treated wastewater from the Hailsham North WwTW enters the Hurst Haven. Hailsham South WwTW currently serves the majority of Hailsham itself (to the south of the town), as well as Polegate and Willingdon. Treated waste water from Hailsham South WwTW enters the Horse Eye Sewer and ultimately enters into the Hurst Haven also. Horam Parish is in north of the Cuckmere and Pevensey Levels catchment area and is served by the Vines Cross WwTW that serves over 12,000 people in Heathfield, Horam and surrounding villages. The works is permitted to discharge 2,986 m³ per day into the Waldron Gill. These WwTWs discharge treated waste water into the Pevensey Levels, in line with the Environmental Permits granted by the Environment Agency.
- 10.5 Both of the WwTWs at Hailsham 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

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

Ramsar site are potentially affected by a number of issues associated with new development.

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

been identified. Southern Water has since identified options and a preferred solution (the provision of high-rate secondary treatment process at both WWTWs in order to overcome the environmental constraint), which has commenced.

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 Horam NDP 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 site⁶ 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.

⁶ [Habitats Regulations Appraisal of Plans Guidance for Plan-Making Bodies in Scotland, January 2015, David Tyldesley and Associates](#)

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

Reference	Policy	Aim(s)	Significant Effect? (Y/N)
HCD1	Settlement pattern and landscape character	This policy seeks for development to conserve and enhance the landscape character, settlement pattern and features of Horam parish. It also requires that development should conserve and enhance the landscape and scenic beauty of the High Weald AONB.	N This policy intends to conserve the landscape character and settlement pattern of the area which includes elements of the natural and built environment. Reason A
HCD2	Local settlement gaps	The policy aims to maintain the distinct identity of the different settlements in the parish by identifying local settlement gaps, as identified in the policy, within which development is restricted.	N The policy intends no development or change. Reason B
HCD3	Waldron Ghyll Valley	The policy seeks to maintain the openness of the Waldron Ghyll Valley and supports opportunities to mitigate flood risk and enhance its biodiversity and amenity value, including new woodland and the	N The policy seeks to protect the natural environment. Reason A

Reference	Policy	Aim(s)	Significant Effect? (Y/N)
		restoration of wetland areas.	
HCD4	Important local views	The policy seeks to retain important local views as identified in the NDP.	N The policy intends to protect the natural environment. Reason A
HCD5	Design of development	This policy seeks to set design criteria for all new development within the Parish.	N This policy relates to the design of new development. Reason B
HCD6	Non-designated heritage assets	The policy seeks to conserve or enhance non-designated heritage assets. A list of 'candidate' local heritage sites has been identified.	N This policy seeks to conserve or enhance the historic environment. Reason A
HHD1	Housing type, size and mix	This policy aims to ensure that a mix of different sized homes is provided on new developments, with a focus on smaller and mid-sized homes. It also seeks adaptable housing and supports specialist housing in accessible locations.	N This policy does not allocate new housing but influences the mix of future housing, level of adaptability and supports specialist housing only in accessible locations. Reason B
HHD2	Affordable housing	The policy sets criteria for the provision of affordable homes, in	N This policy does not allocate new

Reference	Policy	Aim(s)	Significant Effect? (Y/N)
		terms of the overall percentage required, the mix of tenures and design.	housing but influences the overall percentage, tenure and design of affordable housing on future housing developments only. Reason B
HCE1	Nature and biodiversity	The policy aims for new development to retain and protect existing priority habitats, as identified in the NDP, and other important habitats and sets criteria for the incorporation of green infrastructure for new developments.	N The policy intends to protect the natural environment. Reason A
HCE2	Trees and hedgerows	The policy seeks to retain existing woodland, trees and hedgerows and promotes new planting in certain circumstances.	N The policy intends to protect the natural environment. Reason A
HCE3	Dark skies and lighting	The policy aims to protect the night sky and natural environment from light pollution.	N The policy intends to protect the natural environment. Reason A
HCE4	Local green space designations	This policy seeks to designate twenty Local Green Spaces and affords them	N

Reference	Policy	Aim(s)	Significant Effect? (Y/N)
		protection from development other than in very special circumstances.	The policy intends to protect the natural environment. Reason A
HCE5	New amenity green spaces	The policy requires that sufficient amenity green space and play space is provided on new developments and sets design criteria for this.	N This policy relates to the design of amenity spaces for new development. Reason B
HCE6	Flood risk	The policy sets a number of criteria to reduce flooding in the parish as a result of new development. The policy also 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
HLE1	Horam village centre	The policy aims to retain the role and function of Horam village centre. It defines what uses will be supported and resisted within Horam village centre and provides design guidelines for new development in the village centre. It also safeguards existing 'main town centre	N The policy does not seek to allocate development but indicates the broad location (i.e. within Horam Village Centre) where development could be acceptable. The policy does not consider scale or the

Reference	Policy	Aim(s)	Significant Effect? (Y/N)
		uses' by only supporting a change of use where the applicant demonstrates it has met certain criteria.	specific location of development. Reason E
HLE2	Employment	This policy aims to support new commercial activity and the expansion of existing commercial activity subject to certain criteria. It also seeks to safeguard existing businesses and support the provision of additional employment floorspace for smaller businesses where it is in a suitable location.	N The policy does generally support the retention of existing employment premises and additional employment floorspace in 'suitable' locations. It does not allocate land for a specific purpose and it does not consider location or scale. Reason E
HLE3	Home working	This policy seeks to support homeworking, subject to certain criteria which it lists.	N This policy does generally support home working, insofar as planning permission is required, including the construction of garden studios to facilitate homeworking. It does not allocate land for a specific purpose and it does

Reference	Policy	Aim(s)	Significant Effect? (Y/N)
			not consider location or scale. Reason E
HLE4	Visitor accommodation and facilities	The policy supports new proposals for visitor accommodation and explains how they will be assessed. It also provides guidance on proposals for new camping or caravan sites, and extensions/ intensification of existing camping or caravan sites.	N This policy does not allocate land for development. It does provide guidance on the type of visitor accommodation development that will be supported, including extensions to or intensification of existing caravan and camping sites. It does not allocate land for a specific purpose and it does not consider location or scale. Reason E
HTM1	Traffic management	The policy seeks to ensure that development proposals will not have an adverse impact on road safety. It also includes criteria on design for proposals that involve the creation of new streets.	N This policy relates to the design of new development. Reason B
HTM2	Active and healthy travel	This policy requires the provision of active travel infrastructure on	N

Reference	Policy	Aim(s)	Significant Effect? (Y/N)
		new developments and sets criteria for the design of new cycling and walking routes for new development. It aims to promote active travel.	The policy relates to the design of new development. Reason B
HTM3	The Cuckoo Trail	This policy aims to retain and enhance the Cuckoo Trail, including the improvement of existing and creation of new access points to the Cuckoo Trail; the policy supports proposals that meet the criteria listed.	N Within this policy, there is a potential for change (e.g. the addition of hardstanding), including the provision of new access points to the Cuckoo Trail. However, the policy does not allocate land for a specific purpose and it does not consider the location or scale. Reason E
HTM4	Public transport	This policy supports proposals that incorporate sustainable transport measures, such as new bus routing, new or improved waiting facilities and other types of transport infrastructure.	N Within this policy, there is a potential for change (e.g. the addition of transport infrastructure, waiting facilities, walking and cycling routes). However, the policy does not allocate

Reference	Policy	Aim(s)	Significant Effect? (Y/N)
			land for a specific purpose and it does not consider the location or scale. Reason E
HCF1	Community facilities	This policy provides support and guidance as to what new community facilities should be incorporated, as well as design criteria. It also lists the level of information an applicant would need to provide should a proposal involve the loss of a community facility.	N This policy does not allocate land for new community facilities. It does provide support for new community facilities generally and identifies criteria for when this may be acceptable. However, the policy does not allocate land for a specific purpose and it does not consider the location or scale. Reason E
HCF2	Youth facilities	This policy supports new and improved youth facilities and provides design criteria, should an application be submitted for such a proposal.	N This policy does not allocate land for new youth facilities. It does provide support for new community facilities generally and identifies criteria for when this may be acceptable. However, the policy does not allocate

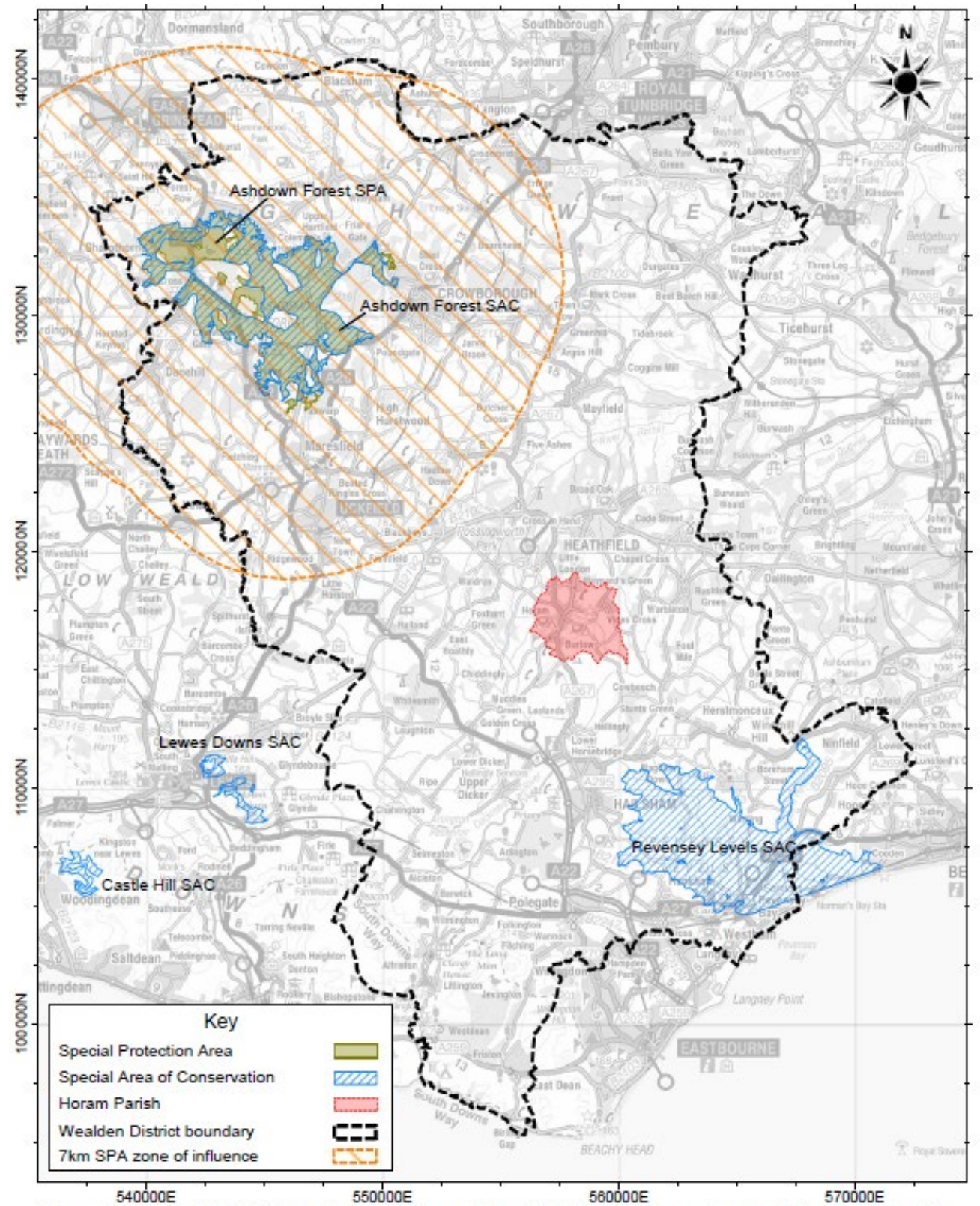
Reference	Policy	Aim(s)	Significant Effect? (Y/N)
			land for a specific purpose and it does not consider the location or scale. Reason E
HCF3	Infrastructure	This policy requires major developments to demonstrate how the infrastructure will be delivered and requires new infrastructure to be delivered in the first phase of development.	N This policy only relates to how and when infrastructure should be delivered on site. The policy does not allocate land for a specific purpose and it does not consider the location or scale of new infrastructure development. Reason E
HCF4	Allotments and food growing opportunities	The policy requires proposals for major development to provide new growing space in the form of allotments, community orchards or gardens.	N This policy relates to the design of allotments (food growing opportunity spaces) as part of new major development schemes. Reason B

12. Conclusion

- 12.1 As a result of the assessment in Section 11, we can conclude that the Horam NDP will in itself, not result in a 'likely significant effect' on a European site, in particular the Ashdown Forest SAC or Pevensy Levels SAC and Ramsar site. Therefore, an Appropriate Assessment is not required.

- 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 the table above and policies in category E).
- 12.3 It is therefore considered appropriate to rely on the provision in the Habitat Regulations that requires a habitats regulations assessment at a later stage, which in this case would be at the planning application stage, when the exact detail and location of any proposed development in which to undertake an assessment will be available.
- 12.4 Based on the conclusion above an Appropriate Assessment of the Horam Neighbourhood Plan is not required. Wealden District Council consulted Natural England on this report and its conclusion. Their response states:
- “Your assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. On the basis of the information provided, Natural England **concurs** with this view”.*
- 12.5 Natural England’s full response is available at Appendix 5. Should significant changes be made to the Plan as it develops, a new screening assessment may be required.

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



Appendix 2: European and Ramsar Site Information.

Site	Pevensey Levels SAC
Characteristics of European Site	<p><u>Habitat Present</u></p> <ul style="list-style-type: none"> • Inland water bodies (Standing water, running water) (2.5%) • Humid grassland, Mesophile grassland (97.5%)⁷ <p><u>Other Characteristics</u></p> <p>1 Terrestrial: Soil & Geology: nutrient-poor, clay, alluvium, peat, basic, shingle, sand, mud, sedimentary</p> <p>2 Terrestrial: Geomorphology and landscape: lowland, coastal, floodplain⁸</p> <p>Pevensey Levels is one of the largest and least-fragmented lowland wet grassland systems in southeast England. The area is largely reclaimed land with extensive grazed wet meadows actively maintained by purpose built drainage systems and characteristic dykes. A small area of shingle and intertidal muds and sands is included within the site. The site supports a variety of important wetland communities, including nationally rare and scarce aquatic plants and invertebrates, and a notable assemblage of breeding and wintering wildfowl⁹.</p>
Qualifying Interests	Special Area of Conservation

⁷ [JNCC Website](#)

⁸ [Standard Data Form for sites within the 'UK national site network of European sites'](#)

⁹ [European Site Conservation Objectives: Supplementary advice on conserving and restoring site features.](#)

Site	Pevensey Levels SAC
	<p><u>Annex I habitats that are a primary reason for selection of this site:</u></p> <p>Not applicable</p> <p><u>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</u></p> <p>Not applicable</p> <p><u>Annex II species that are a primary reason for selection of this site:</u></p> <p>4056 Ramshorn snail <i>Anisus vorticulus</i></p> <p><i>Anisus vorticulus</i> occurs across a range of sites in southern and eastern England. Pevensey Levels is a large and expansive grazing marsh that supports <i>Anisus vorticulus</i> in both a wide spatial distribution and in good population density classes¹⁰.</p> <p><u>Annex II species present as a qualifying feature, but not a primary reason for site selection:</u></p> <p>Not applicable</p>
Conservation Objectives	<p>With regards to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;</p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p>

¹⁰ [JNCC Website](#)

Site	Pevensey Levels SAC
	<ul style="list-style-type: none"> • The extent and distribution of the habitats of qualifying species • The structure and function of the habitats of qualifying species • The supporting processes on which the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site¹¹.
Current Site Condition	The SSSI is considered to be in 99.5% Unfavourable-Recovering and 0.5% Partially destroyed ¹² .
Threat to Qualifying Interests	<p>Threats and Pressures</p> <p><u>Negative</u></p> <ul style="list-style-type: none"> • H02 - Pollution to groundwater (point sources and diffuse sources) (inside and outside site) • I01 - Invasive non-native species (inside and outside site) • J02 - Human induced changes in hydraulic conditions (inside and outside site) <p><u>Positive</u></p> <ul style="list-style-type: none"> • B02 - Forest and Plantation management & use (inside site)

¹¹ [European Site Conservation Objectives for Pevensey Levels SAC](#)

¹² This is the latest position from the Natural England website [SSSI Condition Summary \(March 2023\)](#)

Site	Pevensey Levels SAC
	<ul style="list-style-type: none"> • 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) ¹³
Factors that could adversely affect the site's ecological character including changes in land (including water) use and development projects	<ul style="list-style-type: none"> • Introduction / invasion of non-native plant species (of particular relevance is floating pennywort); • Pollution – domestic sewage (sewage treatment works). <p><i>Anisus vorticulus</i> is a species of the upper water levels of ditches, frequently amidst botanically rich vascular plant assemblages in a mid to upper mid successional state. It favours alkaline waters although it appears tolerant of a relatively wide range of physio-chemical parameters. Appropriate ditch management is the key to the conservation of this species. Control of shade-inducing marginal vegetation is also important, as is maintaining access to the water's edge for livestock. It is also important to ensure good water quality by instigating the appropriate safeguards. This is being implemented through good environmental management, Catchment Sensitive Farming, Environmental Stewardship and Environment Agency's review of existing discharge and abstraction consents. A Water Level Management Plan, devised and managed by Environment Agency, is in place to control ditch levels. Environmental Stewardship schemes continue to encourage sensitive management, particularly of the ditches to address problems brought about by neglect.</p>

¹³ [Standard Data Form for sites within the 'UK national site network of European Sites'.](#)

Site	Pevensey Levels SAC
	The main threats to the species include land drainage, inappropriate habitat management and eutrophication.
Key Environmental Conditions to Maintain Site Integrity	The Lesser whirlpool ram's-horn snail <i>Anisus vorticulus</i> is a small aquatic snail with a flattened spiral shell rarely more than 5 mm in diameter. It occurs in unpolluted, calcareous waters in marsh drains with a dense aquatic flora, and favours ditches with a diverse flora but little emergent vegetation. It often floats on the surface amongst duckweed <i>Lemna</i> spp. Ditches that are either completely cleared of vegetation or are choked with weed and silt are unsuitable. Winter flooding may be important in enabling young snails to colonise new ditches ¹⁴ .
Relevant Site Management Plans / Statements	<p><u>Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Pevensey Levels SAC</u></p> <p>The plan identifies a number of priorities, issues and actions in relation to:</p> <ul style="list-style-type: none"> • Inappropriate water levels; • Invasive species; and • Water pollution¹⁵.

¹⁴ [European Site Conservation Objectives: Supplementary advice on conserving and restoring site features](#)

¹⁵ [Site Improvement Plan Pevensey Levels](#)

Site	Pevensey Levels Ramsar Site
Characteristics of European Site	The site is one of the largest and least fragmented lowland wet grassland systems in southeast England, including a small area of shingle and intertidal muds and sands. The low-lying grazing meadows are intersected by a complex system of ditches which support rare and scarce aquatic plants and invertebrates (freshwater molluscs and dragonflies <i>Odonata</i> spp) as well as breeding and wintering wildfowl ¹⁶ .
Qualifying Interests	<p><u>Ramsar Criterion 2a</u></p> <p>The site supports an outstanding assemblage of wetland plants and invertebrates including many British Red Data Book species.</p> <p><u>Ramsar Criterion 2b</u></p> <p>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 <i>Coleoptera</i> and supports an outstanding assemblage of dragonflies <i>Odonata</i> spp¹⁷.</p>
Ecological Features	Pevensey Levels supports a range of important communities of wetland flora and fauna. Various stages of succession are present in the ditches. Floating and submerged aquatic plants such as duckweeds <i>Lemna</i> spp, pondweeds <i>Potamogeton</i> spp, or water fern <i>Azolla</i> spp. represent the pioneer stages. Larger floating or emergent plants such as frogbit <i>Hydrocharis morsusraeae</i> , bur-reed <i>Sparganium erectum</i> and arrow head <i>Sagittaria sagittifolia</i> follow these. Finally, common reed <i>Phragmites australis</i> or hawthorn <i>Crataegus monogyna</i> becomes dominant. Left undredged, the ditches lose their diversity

¹⁶ [Ramsar Sites Information Service](#)

¹⁷ [Ramsar Information Sheet](#)

Site	Pevensey Levels Ramsar Site
	<p>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 <i>Glaucium flavum</i> and sea campion <i>Silene uniflora</i>.</p> <p>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 <i>Dolomedes plantarius</i> has its stronghold at Pevensey.</p> <p>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 respectively¹⁸.</p> <p><u>Noteworthy Flora</u></p> <p>Nationally important species occurring on the site Higher plants:</p> <ul style="list-style-type: none"> • <i>Althaea officinalis</i> • <i>Ceratophyllum submersum</i> • <i>Crambe maritima</i> • <i>Potamogeton acutifolius</i> • <i>Potamogeton friesii</i> • <i>Potamogeton trichoides</i>

¹⁸ [Information sheet on Ramsar Wetlands \(RIS\)](#)

Site	Pevensey Levels Ramsar Site
	<ul style="list-style-type: none"> • <i>Sium latifolium</i> • <i>Stratiotes aloides</i> <p><u>Noteworthy fauna</u></p> <p>Nationally important species occurring on the site:</p> <p>Invertebrates</p> <ul style="list-style-type: none"> • <i>Segmentina nitida</i> • <i>Anisus vorticulus</i> • <i>Valvata macrostoma</i> • <i>Hydrophilus piceus</i> • <i>Gyrinus suffriani</i> • <i>Elmatophilus brevicollis</i> • <i>Bagous puncticollis</i> • <i>Dolomedes plantarius</i> • <i>Atylotus rusticus</i> • <i>Odontomyia ornate</i> • <i>Pherbellia argyra</i> • <i>Psacadina zernyi</i> • <i>Limophalia pictipennis</i>

Site	Pevensey Levels Ramsar Site
	<ul style="list-style-type: none"> • <i>Tipula marginata</i> • <i>Placobdella costata</i> <p><u>Assemblage of International importance</u></p> <p>The site supports an appreciable assemblage of rare, vulnerable or endangered species or subspecies of plant or animal. Pevensey Levels is probably one of the best sites in Great Britain for freshwater molluscs, one of the very best sites for aquatic <i>Coleoptera</i> and supports an outstanding assemblage of <i>Odonata</i>¹⁹.</p>
Adverse Factors affecting the Ecological Character of the Site	<ul style="list-style-type: none"> • Vegetation succession; • Eutrophication; • Introduction of invasive / exotic species; • Pollution – domestic sewage; • Pollution – fertilisers; • Pollution – pesticides/ agricultural runoff; and • General disturbance from human activities²⁰.

¹⁹ [Information Sheet on Ramsar Wetlands](#)

²⁰ [Ramsar Information Sheet](#)

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

Site	Ashdown Forest SAC
Characteristics of European Site	<p>N08 – Heath, Scrub, Maquis and Garrigue, <i>Phygrana</i> 60% coverage</p> <p>N19 – Mixed woodland 40% coverage</p> <p><u>Other Characteristics</u></p> <p>1 Terrestrial: Soil & Geology: sandstone, acidic, clay, nutrient-poor</p> <p>2 Terrestrial: Geomorphology and landscape: lowland²¹</p>
Qualifying Interests	<p>Special Area of Conservation (SAC)</p> <p><u>Annex I habitats that are a primary reason for selection of this site:</u></p> <p>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> for which this is considered to be one of the best areas in the United Kingdom.</p> <p>Ashdown Forest contains one of the largest single continuous blocks of lowland heath in south-east England, with both 4030 European dry heaths and, in a larger proportion, wet heath. The M16 <i>Erica tetralix</i> – <i>Sphagnum compactum</i> wet heath element provides suitable conditions for several species of bog-mosses <i>Sphagnum spp.</i>, bog asphodel <i>Narthecium ossifragum</i>, deergrass <i>Trichophorum cespitosum</i>, common cotton-grass <i>Eriophorum angustifolium</i>, marsh gentian <i>Gentiana pneumonanthe</i> and marsh clubmoss <i>Lycopodiella inundata</i>.</p> <p>The site supports important assemblages of beetles, dragonflies, damselflies and butterflies, including the nationally rare silver-studded blue <i>Plebejus argus</i>, and birds of European importance, such as</p>

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

Site	Ashdown Forest SAC
	<p>European nightjar <i>Caprimulgus europaeus</i>, Dartford warbler <i>Sylvia undata</i> and Eurasian hobby <i>Falco subbuteo</i>.</p> <p>4030 European dry heaths for which this is considered one of the best areas in the United Kingdom.</p> <p>The dry heath in Ashdown Forest is an extensive example of the south-eastern H2 <i>Calluna vulgaris</i> – <i>Ulex minor</i> community. This vegetation type is dominated by heather <i>Calluna vulgaris</i>, bell heather <i>Erica cinerea</i> and dwarf gorse <i>Ulex minor</i>, with transitions to other habitats. It supports important lichen assemblages, including species such as <i>Pycnothelia papillaria</i>. This site supports the most inland remaining population of hairy greenweed <i>Genista pilosa</i> in Britain²².</p> <p><u>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</u></p> <p>Not applicable</p> <p><u>Annex II species that are a primary reason for selection of this site:</u></p> <p>Not applicable</p> <p><u>Annex II species present as a qualifying feature, but not a primary reason for site selection:</u></p> <p>1166 Great crested newt²³ <i>Triturus cristatus</i> for which the area is considered to support a significant presence.</p>

²² [JNCC website](#)

²³ See link below: [Great Crested Newt](#)

Site	Ashdown Forest SAC
Conservation Objectives	<p>Natural England published its Conservation Objectives for Ashdown Forest SAC on 27 November 2018 (version 3)²⁴. This document updates and replaces an earlier version dated 30 June 2014:</p> <p>With regards to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;</p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats and habitats of qualifying species • The structure and function (including typical species) of qualifying natural habitats • The structure and function of the habitats of qualifying species • The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.
Current Site Condition	Ashdown Forest SSSI is currently considered to be in 16.59% Favourable condition, 78.42% Unfavourable-Recovering and 4.99% Unfavourable Declining ²⁵ .

²⁴ [European Site Conservation Objectives for Ashdown Forest Special Area of Conservation](#)

²⁵ This is the latest position according to the Natural England website [Designated Sites View](#) (March 2023)

Site	Ashdown Forest SAC
Threats to Qualifying Interests	<p><u>Negative</u></p> <ul style="list-style-type: none"> • H04 - Air pollution, air-borne pollutants (inside and outside site) • J02 - Human induced changes in hydraulic conditions (inside and outside site) • A02 - Modification of cultivation practices (inside site) • G01 - Outdoor sports and leisure activities, recreational activities (inside site) <p><u>Positive</u></p> <ul style="list-style-type: none"> • A02 - Modification of cultivation practices (inside site)²⁶
Ecological Requirements of Annex I Habitats and Annex II Species	<p><u>H4010 Northern Atlantic Wet Heaths <i>Erica tetralix</i></u> – Wet heath is a community that requires acid, nutrient poor soils that are at least seasonally water logged. Wet heath often occupies areas of impeded drainage on lower valley sides and less-steeply sloping ground. Drainage is a key factor. Wet heath can occur naturally, due to abiotic factors such as soil acidity, low nutrient status and waterlogged soil conditions, which impedes succession to woodland. Wet heaths require relatively high rainfall and an even spread of rain throughout the year. Relative humidity is required to remain moderately high with winters not too cold and summers not too hot. Mild winter temperatures are important for many of the individual plant and animal species.</p> <p><u>H4030 European dry heaths</u> – European dry heaths typically occur on freely-draining, dry acidic to calcareous soils with generally low nutrient content. Nearly all dry heath is semi-natural, being derived from woodland and developed through grazing and burning. Dry heaths vary in their flora and fauna</p>

²⁶ [Standard Data Form for sites within the 'UK national site network of European sites'](#)

Site	Ashdown Forest SAC
	<p>according to climate, and are also influenced by altitude, aspect, soil conditions (especially base-status and drainage), maritime influence and grazing and burning intensity.</p> <p><u>Great crested newt</u> - Great crested newts rely on waterbodies for breeding but otherwise they spend much of their lives on land. They 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 °C. Great crested newts require quite specific pond conditions for breeding. Ponds ideally need to have neutral to alkaline water (pH 6 or above) with areas of open water and well vegetated margins. Breeding ponds tend to be nutrient rich, not too shaded, free of fish with not too many waterfowl present. They require suitable refuges to use in extreme weather and during daytimes, such as large pieces of rotting deadwood, rubble piles or disused mammal burrows.</p>
Relevant Site Management Plans/ Statements	<p><u>Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Ashdown Forest SAC²⁷</u></p> <p>The plan identifies a number of priorities, issues and actions in relation to:</p> <ul style="list-style-type: none"> • Change in land management; • Air Pollution: impact of atmospheric nitrogen deposition; • Public Access/Disturbance; and

²⁷ [Site Improvement Plan: Ashdown Forest](#)

Site	Ashdown Forest SAC
	<ul style="list-style-type: none"> Hydrological changes.

Site	Ashdown Forest Special Protection Area (SPA)
Characteristics of European Site	<p><u>Special Protection Area</u></p> <p>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 <i>Calluna vulgaris</i>, Bell Heather <i>Erica cinerea</i> and Cross-leaved Heath <i>E. tetralix</i> in the dampest conditions. Where drier heaths occur, they are dominated by heather in association with Gorse <i>Ulex europaeus</i> and Dwarf Gorse <i>U. minor</i>. Streamsides and mires add further variety, with <i>Sphagnum</i> mosses, Cottongrass <i>Eriophorum</i> sp., Bog Asphodel <i>Narthecium ossifragum</i> and Round-leaved Sundew <i>Drosera rotundifolia</i> all characteristic plants. The woodlands are also varied, with Birch <i>Betula</i> sp. typically establishing first over heath, followed by Oak <i>Quercus robur</i>, Willow <i>Salix</i> sp. and Pine <i>Pinus</i> 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.</p> <p>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.</p>

Site	Ashdown Forest Special Protection Area (SPA)
Qualifying Interests	<p><u>Special Protection Area</u></p> <p>Ashdown Forest qualifies under Article 4.1 of the Birds Directive by regularly supporting nationally important breeding populations of two Annex 1 species²⁸ 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:</p> <p><u>Annex I species/habitats that are a primary reason for selection of this site:</u></p> <p>During the breeding season:</p> <ul style="list-style-type: none"> • Dartford Warbler <i>Sylvia undata</i>, 20 pairs representing 2.1% of the breeding population in Great Britain (Count as at 1994). • Nightjar <i>Caprimulgus europaeus</i>, 35 pairs representing at least 1% of the breeding population in Great Britain (Two year mean, 1991 & 1992)²⁹. <p>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 fires³⁰.</p> <p><u>Annex I species/habitats present as a qualifying feature, but not a primary reason for selection of this site:</u></p>

²⁸ [Ashdown Forest SPA Citation](#)

²⁹ [Ashdown Forest SPA Conservation Objectives Supplementary Advice](#)

³⁰ European Commission: [The Dartford Warbler](#)

Site	Ashdown Forest Special Protection Area (SPA)
	<p>Not applicable</p> <p><u>Annex II species/habitats that are a primary reason for selection of this site:</u></p> <p>Not applicable</p> <p><u>Annex II species/habitats present as a qualifying feature, but not a primary reason for site selection:</u></p> <p>Not applicable</p>
Conservation Objectives	<p>Natural England published the Conservation Objective for Ashdown Forest SPA on 21 February 2019³¹. This document updates and replaces an earlier version dated 30 June 2014.</p> <p>With regards to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;</p> <p>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;</p> <ul style="list-style-type: none"> • 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,

³¹ [Ashdown Forest SPA Conservation Objectives](#)

Site	Ashdown Forest Special Protection Area (SPA)
	<ul style="list-style-type: none"> The distribution of the qualifying features within the site.
Current Site Condition	<p>See above SSSI data in relation to SAC</p> <p><u>Dartford Warbler</u></p> <p>Current Status at Ashdown Forest SPA</p> <p>Dartford warbler numbers within Ashdown Forest declined following the particularly harsh winters of 08-09 and 09-10. However, their population in Sussex is recovering, and a survey by the Sussex Ornithological Society in 2017 found a minimum of 15 territories on Ashdown Forest.</p> <p><u>Nightjar</u></p> <p>The most recent national Nightjar survey in 2004 indicated 82 churring males were present within the SPA. A survey of selected SSSIs in 2010 found 83 churring males³².</p>
Threats to Qualifying Interests	<p><u>Main threats to Dartford Warbler:</u></p> <ul style="list-style-type: none"> Climatic factors Habitat fragmentation Lack of or inadequate habitat management Development pressures Increased levels of disturbance and recreational use affecting breeding productivity

³² [Ashdown Forest SPA Conservation Objectives Supplementary Advice](#)

Site	Ashdown Forest Special Protection Area (SPA)
	<ul style="list-style-type: none"> • Urbanisation effects such as fly tipping, increased fires, dirt track biking, cat predation. <p><u>Main threats to Nightjar</u></p> <ul style="list-style-type: none"> • Disturbance by humans and recreational activities – Nightjars are ground nesting birds and can be disturbed by humans and dogs that may range into heather dominated areas and may flush birds from their nest. • Loss of nesting habitat – The area of heathland in the UK has undergone a dramatic reduction during the course of this century due to agricultural land claim, afforestation and built development. For example, it is estimated that 40% of England's lowland heathland has been lost since the 1950s. Threats continue from housing and infrastructure developments and where heathland lacks appropriate management, it will become unsuitable as a nesting habitat due to invasion by bushes and trees. • Loss of feeding habitat – Nightjars require extensive areas of suitable feeding habitat, especially uncultivated land, therefore the loss of such habitats within a few kilometres of the nesting area may result in the decline in the number of birds. • Decline in food availability – It is possible that a decline in the availability of large insects caused by changes in agriculture (such as the indirect effects of pesticides) and/or climate change, may have affected nightjar populations.
Key Environmental Conditions to Maintain Site Integrity	<ul style="list-style-type: none"> • Low levels of disturbance • Maintain the extent, distribution and availability of suitable breeding habitat • Low levels of air pollution

Site	Ashdown Forest Special Protection Area (SPA)
	<ul style="list-style-type: none"> • Connectivity between different habitats • Habitat management should retain the open, mosaic structure of lowland wet and dry heath, ensuring all life cycles of heather are present. • Maintain water quality and quantity • Maintain mix of vegetation³³
Ecological Requirements of SPA Bird Species	<p>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 (<i>Ulex europaeus</i> and <i>Ulex gallii</i>) 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.</p> <p>Nightjars feed on seasonally available suitable prey consisting of flying insects (such as moths, beetles and flies), being most active at dusk and dawn and in some circumstances well into the night. The nightjar will travel from nest sites to feed on a range of habitats such as heathland, deciduous or mixed woodland, orchards, diverse plantations, riparian habitats, freshwater wetlands and gardens. The birds will travel an average of 3km from the nest site to locate suitable feeding areas, although they can range further.</p> <p>To achieve favourable conservation condition the nightjar requires:</p>

³³ [Ashdown Forest SPA Conservation Objectives Supplementary Advice](#)

Site	Ashdown Forest Special Protection Area (SPA)
	<ul style="list-style-type: none"> • 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	<p><u>Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Ashdown Forest SPA³⁴</u></p> <p>The plan identifies a number of priorities, issues and actions in relation to:</p> <ul style="list-style-type: none"> • Change in land management; • Air Pollution: impact of atmospheric nitrogen deposition; • Public Access/Disturbance; and <p>Hydrological changes.</p>

³⁴ [Site Improvement Plan Ashdown Forest](#)

Site	Lewes Downs Special Area of Conservation (SAC)
Characteristics of European Site	<ul style="list-style-type: none"> • Heath, Scrub, Maquis and Garrigue, Phygrana (5%) • Dry grassland, Steppes (85%) • Humid grassland, Mesophile grassland (5%) • Improved grassland (5%) <p><u>Other characteristics</u></p> <p>1. Terrestrial: Soil & Geology: sedimentary, nutrient-poor, basic</p> <p>2. Terrestrial: Geomorphology and landscape: valley, slope, lowland³⁵</p>
Qualifying Interests	<p><u>Annex I habitats that are a primary reason for selection of this site:</u></p> <p>6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)</p> <p>This site hosts the priority habitat type "orchid rich sites". This chalk grassland site consists largely of CG2 <i>Festuca ovina-Avenula pratensis</i> and CG3 <i>Bromus erectus calcareous</i> grasslands. This site contains an important assemblage of rare and scarce orchids, including early spider-orchid <i>Ophrys sphegodes</i>, burnt orchid <i>Orchis ustulata</i> and musk orchid <i>Herminium monorchis</i>. The colony of burnt orchid is one of the largest in the UK.</p> <p><u>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:</u></p> <p>Not applicable.</p>

³⁵ [Lewes Downs SAC Standard Data Form](#)

Site	Lewes Downs Special Area of Conservation (SAC)
	<p><u>Annex II species that are a primary reason for selection of this site:</u></p> <p>Not applicable.</p> <p><u>Annex II species present as a qualifying feature, but not a primary reason for site selection:</u></p> <p>Not applicable³⁶.</p>
Conservation Objectives	<p>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.</p> <p>The conservation objectives for the Lewes Downs Special Area of Conservation were published on 27 November 2018³⁷. This updates the earlier version published on 30 June 2014, to reflect the consolidation of the Habitats Regulations in 2017.</p> <p>With regards to the SAC and the natural habitats and/or species for which the site has been designated (the ‘Qualifying Features’ listed below), and subject to natural change;</p> <p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats

³⁶ [JNCC Website](#)

³⁷ [European Site Conservation Objectives for Lewes Downs Special Area of Conservation.](#)

Site	Lewes Downs Special Area of Conservation (SAC)
	<ul style="list-style-type: none"> • The structure and function (including typical species) of qualifying natural habitats, and • The supporting processes on which qualifying natural habitats rely <p>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.</p>
Current Site Condition	The SSSI is considered to be in 81.05% favourable condition, 2.69% unfavourable (recovering) condition and 16.26% Unfavourable -Declining ³⁸ .
Threats to Qualifying Interests	<p>Threats and pressures</p> <p><u>Negative</u></p> <ul style="list-style-type: none"> • 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) • GO1 Outdoor sports and leisure activities, recreational activities (inside site) • AO4 Grazing (inside site) <p><u>Positive</u></p> <ul style="list-style-type: none"> • AO2 Modification of cultivation practices (inside site)

³⁸ [Natural England SSSI Condition Summary for Lewes Downs Special Area of Conservation \(March 2023\).](#)

Site	Lewes Downs Special Area of Conservation (SAC)
	<ul style="list-style-type: none"> • AO4 Grazing (inside site) • BO2 Forest and Plantation management & use (inside site) • DO5 Improved access to site (inside site)³⁹
Key Environmental Conditions to Maintain Site Integrity	<ul style="list-style-type: none"> • 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 Plans / Statements	<p><u>Improvement Programme for England's Natura 2000 Sites (IPENS): Site Improvement Plan Lewes Downs</u></p> <p>The plan⁴⁰ identifies a number of priorities, issues and actions in relation to:</p> <ul style="list-style-type: none"> • Game management: pheasant rearing • Undergrazing • Public access / disturbance

³⁹ [Lewes Downs SAC Standard Data Form](#)

⁴⁰ [Lewes Downs Site Improvement Plan](#)

Site	Lewes Downs Special Area of Conservation (SAC)
	Air pollution: impact of atmospheric nitrogen deposition

Appendix 3: Other Relevant Plans

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
<p>Wealden Core Strategy Local Plan⁴¹</p> <p>(adopted February 2013)</p>	<p>The Wealden Core Strategy is the main strategic planning policy document for the district that sets out how the places and communities within Wealden will change up until 2027. This includes strategic allocation for residential, employment and retail development, amongst other matters.</p>	<p>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 (B1⁴²/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.</p>
<p>Wealden Affordable Housing Delivery Local Plan⁴³</p> <p>(adopted May 2016)</p>	<p>This document is the Affordable Housing Delivery Local Plan, which reviews the Wealden District (incorporating the SDNP) Core Strategy Local Plan Policy WSC8 concerning affordable housing. This Local Plan is limited to affordable housing provision and the adopted Core Strategy Policy WCS8 concerning affordable housing, and does not affect any other Core Strategy policy.</p>	<p>This Plan only reviews affordable housing policy and does not look to allocate new land for development so is not likely to cause significant 'in-combination' effects.</p>

⁴¹ [Wealden Core Strategy Local Plan \(adopted February 2013\)](#)

⁴² This is now Use Class E.

⁴³ [Wealden Affordable Housing Delivery Local Plan \(adopted May 2016\)](#)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
<p>Rother Local Plan Core Strategy⁴⁴ (adopted September 2014)</p>	<p>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.</p>	<p>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.</p>
<p>Rother District Council Development and Site Allocations Local Plan⁴⁵ (adopted December 2019)</p>	<p>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.</p>	<p>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</p>

⁴⁴ [Rother Local Plan Core Strategy \(adopted September 2014\)](#)

⁴⁵ [Rother Development and Site Allocations Local Plan \(adopted December 2019\)](#)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
		have now been established.
Tunbridge Wells Borough Core Strategy ⁴⁶ (adopted June 2010)	The Tunbridge Wells Borough Core Strategy is to guide new development and change in the district for the period up to 2026.	The Tunbridge Wells Core Strategy planned for at least 6,000 dwellings to be provided in the borough in the period 2006 to 2026. The Core Strategy also seeks to deliver in the order of 26,500 sq. metres of comparison retail floorspace to the end of 2017.
Tunbridge Wells Borough Site Allocations Local Plan ⁴⁷ (adopted July 2016)	The main purpose of the Tunbridge Wells Borough Site Allocations Local Plan is to allocate land for housing, employment, retail and other land uses to meet the identified needs of the communities within Tunbridge Wells borough to 2026 and beyond. This follows the strategic objectives and sustainable development objectives set out within the Core Strategy.	This Plan only seeks to allocate specific parcels of land to meet the targets for individual settlements and types of development within the borough as published within the Tunbridge Wells Borough Core Strategy. As a consequence, this Plan does not seek to deliver more dwellings, retail floorspace or employment floorspace than is outlined within the Tunbridge Wells Borough Core Strategy, albeit those specific locations

⁴⁶ [Tunbridge Wells Borough Core Strategy \(adopted June 2010\)](#)

⁴⁷ [Tunbridge Wells Borough Site Allocations Local Plan \(adopted July 2016\)](#)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
		for such new development have now been established.
Tunbridge Wells Borough Submission Local Plan 2021 ⁴⁸	The Tunbridge Wells Borough Submission Plan is currently at Examination. If adopted, it will guide development in Tunbridge Wells borough 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 ⁴⁹ (adopted March 2018)	The Plan sets out a vision for how Mid Sussex wants to evolve and provides a delivery strategy for how that will be achieved. As such, it sets out broad guidance on the distribution and quality of development in the form of 'higher level' strategic policies.	The Mid Sussex District Plan (adopted in March 2018) seeks to provide a minimum of 16,390 dwellings between 2014 and 2031 within the district. For employment, the Plan confirms that the total number of additional jobs required within the district over the plan period is estimated to be average of 543 jobs per year, with only a single allocation of 25 hectares of land as a high quality business park at Burgess Hill.
Mid-Sussex District Council Site Allocations	The site allocations DPD provides a framework for the location of new jobs and homes to 2031 and aims to meet the	The Site Allocations DPD allocates additional development sites to meet the residual

⁴⁸ [Tunbridge Wells Borough Submission Local Plan 2021](#)

⁴⁹ [Mid Sussex District Plan 2014-2031 \(adopted March 2018\)](#)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
Development Plan Document ⁵⁰ (Adopted June 2022)	housing and employment requirements established in the District Plan.	necessary to meet the agreed housing requirement as reflected in the District Plan 2014-2031. The Site Allocations DPD also allocates additional employment sites, including a Science and Technology Park to the west of Burgess Hill.
Eastbourne Core Strategy Local Plan ⁵¹ (adopted February 2013)	The Eastbourne Core Strategy Local Plan sets out the Council's spatial vision for Eastbourne up to 2027 and the primary land-use policies to deliver it. It is the key strategic Local Plan upon which other development plan documents are based.	The Eastbourne Core Strategy states that a minimum of at least 5,022 dwellings and 55,430 sq. metres of employment land will be delivered by 2027 within the built-up area boundary of Eastbourne.
Eastbourne Town Centre Local Plan ⁵² (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	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 ⁵³ , the quantum of which will be

⁵⁰ [Mid-Sussex District Council Site Allocations Development Plan Document](#)

⁵¹ [Eastbourne Core Strategy Local Plan \(adopted February 2013\)](#)

⁵² [Eastbourne Town Centre Local Plan \(adopted November 2013\)](#)

⁵³ This is now Use Class E.

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
	out the overarching policy direction for Eastbourne.	confirmed in the Employment Land Local Plan (as confirmed below, this was 3,750 sqm).
Eastbourne Employment Land Local Plan ⁵⁴ (adopted November 2016)	The Eastbourne Employment Land Local Plan is a document that seeks to guide job growth and economic development in Eastbourne up to 2027 as well as identifying an appropriate supply of land for future employment development. This Plan specifically relates to land and buildings within Use Class B1 (now Use Class E), B2 and B8.	The Eastbourne Employment Land Local Plan has a new requirement for employment floorspace of 48,750 sqm to be delivered by 2027. The employment floorspace was to be distributed through the intensification of existing industrial estates (21,875 sqm), the town centre (3,750 sqm) and Sovereign Harbour (23,125 sqm).
Lewes District Local Plan Part 1 ⁵⁵ (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.

⁵⁴ [Eastbourne Employment Land Local Plan \(adopted November 2016\)](#)

⁵⁵ [Lewes District Local Plan Part 1 Joint Core Strategy 2010-2030 \(adopted May 2016\)](#)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
<p>Lewes District Local Plan Part 2. Site allocations and Development Management Policies⁵⁶.</p> <p>(adopted February 2020)</p>	<p>The Lewes District Local Plan Part 2 seeks to deliver the strategic objectives and spatial strategy of the Local Plan Part 1 by allocating additional sites to meet the development growth identified in Local Plan Part 1 and setting out detailed (non-strategic) development management policies to guide development.</p> <p>The Plan only applies to the area of Lewes district covered by the Lewes District Planning Authority (i.e. excluding the area within South Downs National Park).</p>	<p>The Plan only allocates additional sites to meet the development growth already identified in Local Plan Part 1 (outside of the National Park).</p>
<p>South Downs Local Plan⁵⁷</p> <p>(adopted July 2019)</p>	<p>The South Downs Local Plan sets out the vision and policies for the South Downs National Park Area for the period from 2014 to 2033.</p>	<p>The South Downs Local Plan makes provision for approximately 4,750 net additional homes between 2014-2033.</p> <p>The Plan makes provision for approximately 5.3 hectares of office space, 1.8 hectares of industrial and 3.2 hectares of small-scale warehousing between 2014-2033.</p>

⁵⁶ [Lewes District Local Plan Part 2 Site Allocations and Development Management Policies.](#)

⁵⁷ [South Downs Local Plan \(adopted July 2019\)](#)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
Tandridge District Core Strategy ⁵⁸ (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 ⁵⁹ (adopted July 2014)	The Tandridge Local Plan Part 2: Detailed Policies supports the adopted Core Strategy and contains a set of detailed planning policies to be applied locally in the assessment and determination of planning applications over the plan period (2014 -2029).	The Tandridge Local Plan Part 2: Detailed Policies only seeks to review more detailed development management policies and does not contain strategic targets for the quantum of development in the district or seek to allocate sites for development, so is not likely to cause significant 'in-combination' effects.
Tandridge District: Our Local Plan: 2033 ⁶⁰ (Regulation 22 submission January 2019)	The Regulation 22 version of the Tandridge Local Plan (Our Local Plan 2033) sets out the land use requirements for the Tandridge District up to 2033 in accordance with national policy and guidance.	The draft policies of the Regulation 22 version of the Plan will not have 'full weight' in terms of planning decisions until its adoption. However, the Regulation 22 version of the Tandridge Local Plan aims to provide 6,056 homes

⁵⁸ [Tandridge District Core Strategy \(adopted October 2008\)](#)

⁵⁹ [Tandridge Local Plan Part 2: Detailed Policies 2014-2029 \(adopted July 2014\)](#)

⁶⁰ [Our Local Plan 2033 \(Regulation 22 submission\)](#)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
		within the Plan period to 2033 and confirms that the Council will support the delivery of at least 15.3ha of B-class employment space and associated sui-generis uses.
Brighton and Hove City Plan Part One ⁶¹ (adopted March 2016)	The purpose of the Brighton and Hove City Plan – Part One is to provide the overall strategic and spatial vision for the future of Brighton and Hove through to 2030. It will help shape the future of the city and plays important role in ensuring that other citywide plans and strategies achieve their objectives.	The Brighton and Hove City Plan - Part One states that the Council will make provision for at least 13,200 new homes to be built over the plan period (2010 – 2030). The Plan provides for between 100,500 to 105,500 sqm of new employment floorspace and 25,000sqm of new retail floorspace. There are a number of strategic allocations for both employment and retail within the adopted Plan.
Brighton and Hove City Plan Part Two ⁶² (adopted October 2022)	The aim of the Brighton and Hove City Plan - Part Two is to support the implementation and delivery of City Plan Part One, including allocating additional sites and setting out development management	The Plan states that it will make overall provision for a minimum of 3,600 dwellings and 522 student dwellings during the Plan period, alongside some

⁶¹ [Brighton and Hove City Plan Part One \(adopted March 2016\)](#)

⁶² [Brighton and Hove City Plan Part Two \(adopted October 2022\)](#)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
	policies to guide new development to 2030.	allocations for employment and commercial floorspace.
Sevenoaks Core Strategy ⁶³ (adopted February 2011)	The Sevenoaks Core Strategy sets out the vision and policies for the future development in the district over the period to 2026 as well as providing the policy context for other Development Plan Documents.	The Sevenoaks Core Strategy plans to provide 3,300 additional dwellings over the Plan period from 2006 to 2026.
Sevenoaks Allocations and Development Management Plan ⁶⁴ (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 total of 75.5 hectares of employment development largely within Sevenoaks, Swanley and Edenbridge.

⁶³ [Sevenoaks Core Strategy \(adopted February 2011\)](#)

⁶⁴ [Sevenoaks Allocations and Development Management Plan \(adopted February 2015\)](#)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
Crawley Borough Local Plan 2015 – 2030 ⁶⁵ (adopted December 2015)	The Crawley Borough Local Plan sets out the vision and policies for the future development in the borough over the Plan period from 2015 to 2030 as well as providing several residential and commercial allocations.	The Crawley Borough Local Plan states that a minimum of 5,100 net dwellings will be built within the borough in the period 2015 to 2030. For 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 ⁶⁶ (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 the expansion of existing sites. A number of sites are located within Wealden District.
East Sussex, South Downs and Brighton and Hove Waste	The East Sussex, South Downs and Brighton and Hove Waste and Minerals Sites Plan (2017) provides the spatial details for	The Plan identifies a series of waste and minerals sites across East Sussex and

⁶⁵ [Crawley Borough Local Plan 2015-2030 \(adopted December 2015\)](#)

⁶⁶ [East Sussex, South Downs and Brighton and Hove Waste and Minerals Local Plan \(adopted February 2013\)](#)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
and Minerals Sites Plan ⁶⁷ (adopted February 2017)	the requirements contained within the Waste and Minerals Plan that was adopted in 2013. The Sites Plan identifies potential locations for future waste facilities and safeguards existing waste and minerals resource.	Brighton and Hove, which are to be allocated for waste management development that includes land at Lower Dicker and Hailsham. The Plan also safeguards land for mineral extraction, which includes land at Horam (Horam Brickworks) and Ninfield (Little Standard Hill Farm).
East Sussex, South Downs and Brighton and Hove Waste and Minerals Local Plan – Revised Policies ⁶⁸ (Proposed Submission Consultation – September 2021)	The East Sussex, South Downs and Brighton and Hove Waste and Minerals Local Plan – Revised Policies document updates planning policy for the production of minerals safeguarding minerals facilities and minerals in East Sussex and Brighton & Hove.	Policy changes are proposed to the existing waste and minerals Local Plan and the Waste and Minerals Site Plan. There are two key changes: East Sussex and Brighton & Hove are to become more reliant on aggregates from the marine sources and other sources outside of the Plan Area and secondly, the revised policies will provide increased protection for minerals and minerals related infrastructure against inappropriate

⁶⁷ [East Sussex, South Downs and Brighton and Hove Waste and Minerals Local Plan. Waste and Minerals Sites Plan \(adopted February 2017\)](#)

⁶⁸ [East Sussex, South Downs and Brighton and Hove Waste and Minerals Local Plan – Revised Policies \(Proposed Submission – September 2021\)](#)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
		development being located nearby.
West Sussex Joint Minerals Local Plan ⁶⁹ (Adopted July 2018. Partial Review March 2021)	The Minerals Local Plan covers the period to 2033 and sets out the vision and strategic objectives associated with minerals supply developments in West Sussex and within the South Downs National Park where located within West Sussex. It provides the basis for making consistent land-use planning decisions about planning applications for minerals production facilities including quarries.	The Minerals Local Plan allocates strategic minerals sites for clay, soft sand, chalk and stone in West Sussex amongst other matters. The Plan only confirms allocations for additional minerals sites to include an extension to West Hoathly claypit (clay) and Steyning (soft sand).
West Sussex Waste Local Plan ⁷⁰ (adopted April 2014)	West Sussex County Council and South Downs National Park Authority have worked in partnership on the preparation of the West Sussex Waste Local Plan. The Plan covers the period to 2031 and is the most up-to-date statement of the authorities' land-use policy for waste. There was a 5-year review of the Plan in 2019, but this concluded that there was no requirement to update the Plan.	This Plan identifies a series of waste sites across West Sussex which are to be safeguarded, as well as allocations for new opportunities and expansion of existing sites. There are five sites allocated for new built waste management facilities (including for inert waste recycling) at Ford, Climping, Chichester, Horsham and Goddards Green.

⁶⁹ [West Sussex Joint Minerals Local Plan \(adopted July 2018\)](#)

⁷⁰ [West Sussex Waste Local Plan \(adopted April 2014\)](#)

Local Plan and Stage in Process	Aim of the Document	Elements of the Plan that could cause 'in-combination' effects
Other Neighbourhood Development Plans (NDPs)	The aim of these documents is to provide specific planning policies for designated Neighbourhood Development Plan areas (usually Parishes) and should support the respective Local Plans of the districts and boroughs they are located in.	The Neighbourhood Development Plans, once 'made' should, comply with the respective Local Plans of the districts and boroughs mentioned above and therefore these documents should not cause 'in combination' effects over and above the district level plans.

Appendix 4: Sites excluded from the assessment and justification

Site	Impact Pathway	Assessment
Ashdown Forest SPA	Disturbance Urbanisation	Horam Neighbourhood Plan Area falls outside of the 7km zone within which it has been identified that residential development is likely to result in adverse impacts on the SPA from increases in visitor numbers and effects of urbanisation such as cat predation (see map at Appendix 1).
Lewes Downs SAC	Air Pollution Disturbance	Horam Neighbourhood Area is located over 13 km from the Lewes Downs SAC at its closest point. Natural England's advice in relation to potential impacts of air quality is that 'the only habitat likely to be impacted by air quality deterioration is woodland, which is not a qualifying feature of the Lewes Downs SAC'. As such, notwithstanding the fact that no sites are being allocated in the neighbourhood plan, air quality impacts (derived from new development) within Horam are unlikely to cause significant effects on the Lewes Down SAC. It is also not considered that the Neighbourhood Plan, either by itself or in combination with other plans, would increase the numbers of visitors to the site significantly.
Castle Hill SAC	Air pollution	Castle Hill SAC is located over 20km from the Horam Neighbourhood Area. The nearest main road is the Falmer Road, which is located approximately 400m west of the SAC. The SAC therefore falls outside of the area where it is considered that an increase in traffic (derived from new development) could result in likely significant effect.
Hastings Cliffs SAC	Air Pollution Disturbance Hydrology	The Hasting Cliffs SAC is located over 23km from the Horam Neighbourhood Area. The SAC therefore falls outside of the area where it is considered that an increase in traffic

Site	Impact Pathway	Assessment
		(derived from any new development) could result in a likely significant effect. Additionally, it is unlikely that development arising from the Horam NDP, or within Wealden District overall, would have an effect on the water quality or hydrology of the SAC.
Dungeness, Romney Marsh and Rye Bay SPA and Ramsar site.	Disturbance Air pollution Hydrology	Dungeness, Romney Marsh and Rye Bay SPA and Ramsar site are located over 28 km from the Horam Neighbourhood Area. Given the distance, development within the Horam Area will not result in adverse air pollution, water quality or hydrological impacts.
Dungeness SAC	Disturbance Air Pollution Hydrology	Dungeness SAC is located over 31 km from the Horam Neighbourhood Area. Given the distance, development within the Horam Area will not result in adverse air pollution, water quality or hydrological impacts.

Appendix 5: Natural England Response

Date: 06 April 2023
Our ref: 427492
Your ref: Horam Neighbourhood Plan HRA Screening



[REDACTED]
Wealden District Council
Vicarage Lane
Hailsham
East Sussex
BN27 2AX

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear [REDACTED],

Horam Neighbourhood Plan HRA Screening

Thank you for your consultation on the above dated 22 March 2023.

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

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

It is noted that a HRA Screening Opinion has been undertaken in respect of the draft Horam Neighbourhood Plan and that your authority has screened the proposal to check for the likelihood of significant effects. It is also understood that the Neighbourhood Plan does not identify nor allocate any sites for development.

Your assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. On the basis of the information provided, Natural England **concurs** with this view.

Whilst we do not have any specific comments to make on this draft neighbourhood plan beyond those provided above, we would nonetheless refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

[REDACTED]
Sussex & Kent Area Team

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

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, **National Parks (England)**, **National Trails**, **Priority Habitat Inventory**, **public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

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

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

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁵ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

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

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

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

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

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

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

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

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

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) ¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>