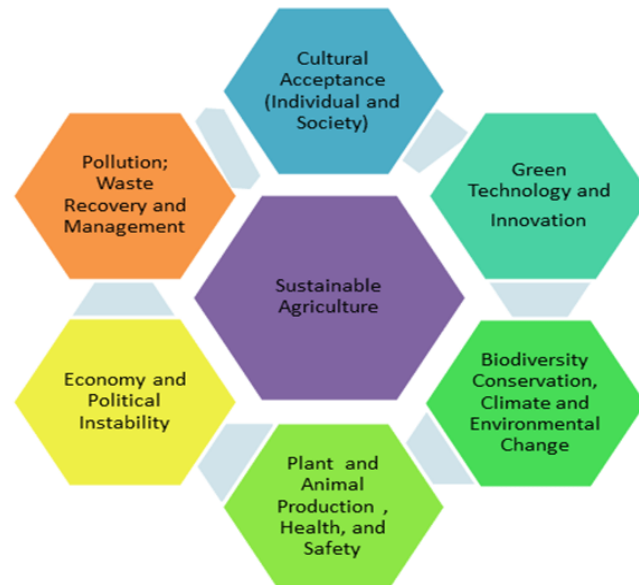


# Wealden Independent Group

## Towards the Wealden Local Plan Consultation

As a Group, we want a Local Plan that reflects the views of those who elected us and prepares Wealden for the future. We are aware that the Planning System is undergoing changes, and we are ready to adapt and explore all options. The Local Plan is the most crucial document a council can produce, as it guides the development and infrastructure of the district. The Independent Group is committed to making this document transparent, accountable, and inclusive. We hope this document informs you, sparks new ideas, and showcases Wealden's potential.



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## Evolution of the Document

*The document began as a concern from the first Local Plan Community Advisory Group (CAG) over economic growth. As discussions unfolded, it became evident that other factors warranted consideration.*

Acknowledging our non-expert status, Ben, and I, supported by the Independent Group of councillors, embarked on a journey to uncover, research, and compile information to represent Wealden and all its communities.

## Farming's Role in Local Plans

We assert that farming is underrepresented in local planning discussions. Yet, we believe agriculture has significant contributions to make towards Wealden's economic growth goals.

## Housing Market Trends

Central government housing allocations are pivotal in local planning. Our analysis diverges on the data influencing these allocations, particularly regarding bedroom count and market demand for smaller estates and downsizing options. For instance, despite a general trend towards smaller properties, the Ridgewood Uckfield development is proceeding with a large proportion of four-bedroom executive homes (311 out of 750).

## Biodiversity, Ecology, Geodiversity, and the Environment

*This document highlights the importance of protecting and enhancing the natural, built, and historic environment in Wealden, as well as mitigating and adapting to climate change.*

- It proposes some policies and actions to achieve these goals, such as:
- Supporting local businesses and food production that are compatible with the rural character and environment of Wealden.
- Protecting and enhancing the landscape and biodiversity of Wealden, especially in the protected areas of South Downs National Park and High Weald Area of Outstanding Natural Beauty.
- Promoting green and blue infrastructure that provides multiple benefits for people and wildlife, such as woodlands, wetlands, ponds, rivers, and green spaces.
- Ensuring high quality design and heritage conservation that respects the local distinctiveness and character of Wealden.
- Improving public services and facilities that reduce carbon emissions and waste, increase energy efficiency and renewable energy, and improve water quality and management.
- See [NPPF Objective](#)

## VISION

**We have a duty to restore, protect and conserve our natural resources and nature recovery. Residents voted for the soul and heritage of Wealden Sussex in the May 2023 elections. Now we must all try to create a local plan, within our power, to do better and to do good and not overdevelop our Sussex.**

**Urbanisation and overdevelopment of our natural resources is not the answer. We hope to contribute our ideas to a sensible direction for true deliverability and sustainability going forward.**

**We remind you of some of the Wealden Highlights our land already is being used.**

**[A Journey through Wealden](#)**



## **Executive Summary of a discussion document by the Wealden Independent Group**

- The document is a draft of a community plan-led approach to meet Wealden's genuine local needs, prepared by the Independent Group of Wealden District Council.
- The document covers various topics such as employment, housing, economy, tourism, farming, nature recovery, climate change, heritage, infrastructure, and design.
- The document aims to create a sustainable and balanced development that respects the rural character and environment of Wealden and addresses the challenges and opportunities of the 21st century.
- The document proposes some policies and actions to achieve the objectives of the plan, such as supporting local businesses and food production, protecting, and enhancing the landscape and biodiversity, promoting green and blue infrastructure, ensuring high quality design and heritage conservation, and improving public services and facilities.

## **Executive Summary of policies that need including or enhancing.**

- a) Policy on Towns and Villages Development Boundaries need to be in place and strengthened.**
- b) Policy for the protection of designated areas and planned important buffer areas.**
- c) Policy highlighting the importance of land use and our farmers in the rural economy.**
- d) Policy to adopt the High Wealden AONB Unit Design Guide as the Norm.**
- e) Policy to bring open market housing in line with the clear need for smaller dwellings.**
- f) Policy on premeditated environmental destruction of land prior to planning application being submitted.**
- g) Policy on all applications that the Council reserve the right to amend condition at reserved matters.**
- h) Policy needed to ensure that ALL new build includes Solar Panels and Grey Water Harvesting.**
- i) Policy providing B.O.A (biodiversity opportunity areas) and LNRS (local nature recovery sites) with protection buffers – including Water Habitat and Sussex Notable Endangered Species.**
- j) More to come.**

# Achieving Sustainable Development

## An economic objective

To help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation, and improved productivity; and by identifying and coordinating the provision of infrastructure.

We added protection of an already successful economy with vibrant tourism and farming (current industrial what's built/approved?)

## A social objective

To support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful, and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

## An environmental objective

To protect and enhance our natural, built, and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

We added leading by climate change. Watercourse health, nature recovery and woodland/habitat/species priorities

**What follows builds upon the three objectives in developing a local plan that contains strategies and policies that supports the three elements as above and ensures that the rural integrity of the Wealden Landscape and meets the aspiration of the current residents. Plan Making Guide**

# Executive Summary and Common Ground on Housing Numbers

**Current Data to calculate District Housing Target is 2014**

## Common Ground

Current Affordability Factor 40%

**Local Plan Period 2021 – 2040**

Housing Target is based on a 10-year rolling average.

### Target Housing Numbers 2021 – 2030

Using 2014 Data 875 per year

**Using 2016 Data 844 per year**

Using 2018 Data 602 per year

**Using 2020 Data ??? per year**

**SUGGESTED STARTING POINT USING LATEST GENUINE HOUSING NEED DATA**

**\*Exception Tests Applied)**

### 2031 - 2040

Using 2014 Data 762 per year (only 9 years available)

**Using 2016 Data 710 per year**

Using 2018 Data 480 per year

**Using 2020 Data ??? per year**

2020 Data not released due to adjustment being made because of the Census 2021. [Interactive 2021 Census Maps](#)

House of Commons statement 2020 [here](#) The Numbers [here](#)

Affordability Factor needs to be discussed as current rate set by central government is base figure plus 40%.

[Government Proposal](#) (section 22) – is that if an authority has 115% of permissions against housing target, then presumption in favour will fall away.

Comment

Note: Applying the Affordability Factor has clearly failed [Housing affordability in England and Wales: 2021](#)

With the Wealden Housing Register showing a need for 75-80% one- and two-bedroom properties a policy is needed to bring market sector more in line.

Current Housing Stock in Wealden by the numbers of bedrooms 1 bed – 7.6%, 2 bed – 26.9%, 3 bed – 34.9%, - 4 bed plus – 30.6% nearly approaching the reverse of the housing register.

Wealden Housing Consultant [iceni](#) in the Wealden Local Housing Needs Assessment state that

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	5%	30%	40%	25%
Affordable home ownership	20%	40%	30%	10%
Affordable housing (rented)	40%	30%	25%	5%

Question – is the Wealden Local Housing Needs Assessment truly reflective of need in the market sector when compared to Housing Register.

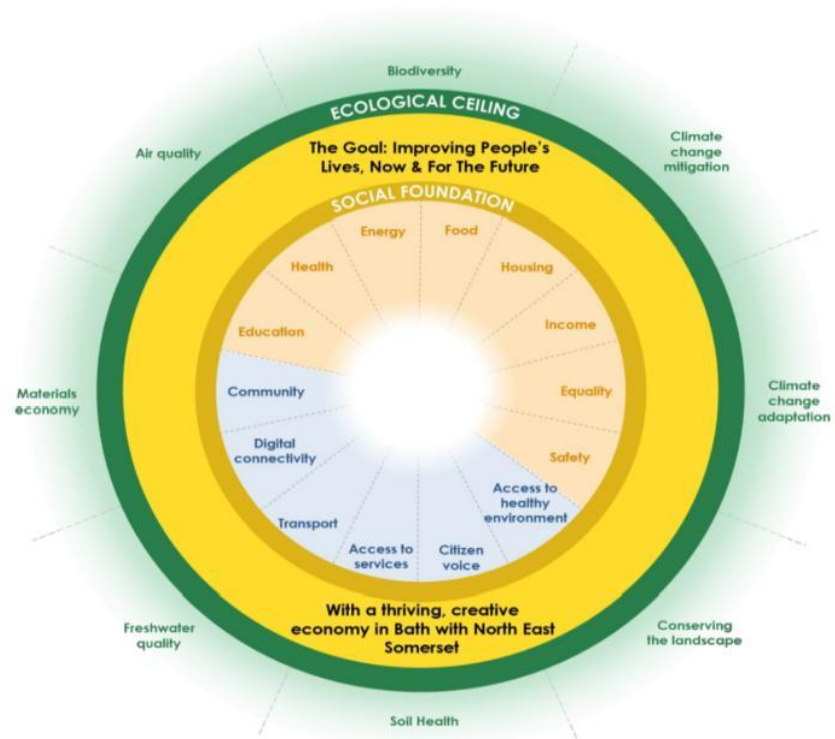
East Sussex Figures quote population increase in several way, natural Population Growth is negative whereas Dwelling Led Population is growing.

East Sussex in Figure also show that 70% of inward migration is from neighbouring Authorities, 28% from further afield in the UK and 2% from international migration.

Clearly with the possibility of a revised NPPF coming in late 2023 the situation may bring about different factors. In conclusion the Independent Group believes that the most recent data should be used (2018) and moving to 2020 when released, and the current affordability factor applied and adjusted if it changes in the future.



# GDP, GEP and Doughnut Economics



## Doughnut Economics

Is a new economic model that aims to create a society that can provide enough materials and services for everyone while utilizing resources in a way that does not threaten our future security and prosperity. It is not a time-bound concept, but rather an ongoing effort to change the way we think about economics and sustainability.

This approach is currently being used in the preparation at Bath and North East Somerset Local Plan 2022 to 2042: [Launch Document](#)

[The scope and content of the Local Plan | Bath and Northeast Somerset Council \(bathnes.gov.uk\)](#)

Click on the Doughnut to see what's inside.

The following is an extract from the Bath and Northeast Somerset Launch Document

## How we assess our priorities: the Doughnut Economics model

The Local Plan will need to address a range of aims which are sometimes conflicting. We are suggesting the use [The Doughnut Economics model](#), to assess these conflicts, and establish the most appropriate and sustainable planning framework.

This model is a tool to help make economic decisions which combat climate change, but at the same time seek to meet social needs. The model helps to show how policies and proposals will affect the environment and people. If it shows that a policy will have a harmful impact on the environment or on people, there is an opportunity to modify or delete it from the Plan.

The diagram below shows an example of what a B&NES-focused Doughnut Economics model might look like.

A different take on a Vision Strategy can be seen [here](#)

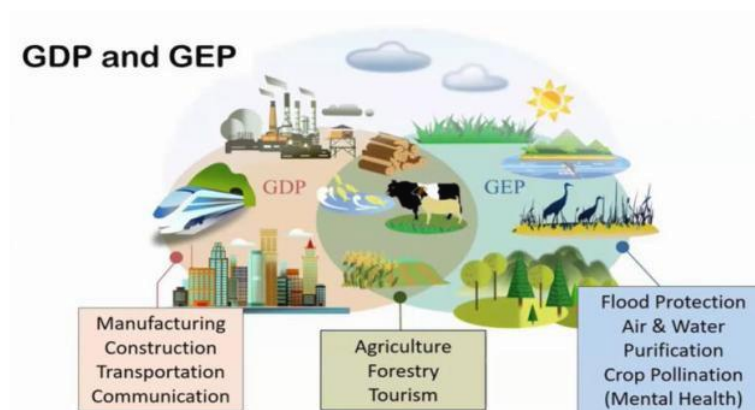
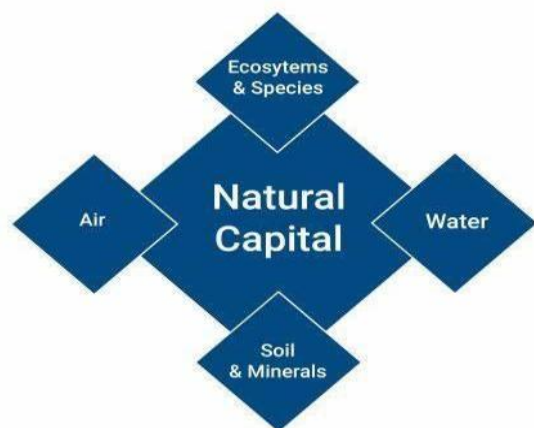
## GDP working with GEP.

Gross Domestic Product (GDP) is a widely used metric to measure the economic growth of a country. It is the monetary value of all goods and services produced within a country's borders in a given period of time, usually per year. [However, GDP does not account for the environmental costs of economic activity and the contributions of nature to economic activity and human well-being <sup>1</sup>.](#)

Gross Ecosystem Product (GEP) is an alternative metric that accounts for the economic value of the ecosystem in providing products and services. [It is one of the components of Green GDP, which is an indicator of economic growth with environmental factors taken into consideration along with the standard GDP of a country <sup>2</sup>.](#)

[In summary, while GDP measures the monetary value of all goods and services produced within a country's borders, GEP accounts for the economic value of the ecosystem in providing products and services <sup>12</sup>.](#)

### We need to identify Wealden [Critical natural Capital](#)



Calculating Gross Ecosystem Product (GEP) is a complex process that involves assessing the economic value of the ecosystem in providing products and services. [The calculation of GEP is based on the following steps <sup>1</sup>](#): ONS - Principles of UK natural capital accounting: 2023 [here](#)

ONS - Principles of UK natural capital accounting: 2023 [here](#)

1. **Identifying the ecosystem services:** The first step is to identify the ecosystem services that are being provided by the ecosystem. These services can be classified into four categories: provisioning, regulating, cultural, and supporting.

## How do we create SAFE SPACE?

1. Use the most up to date data.
2. Use sustainable methods and materials.
3. Consider impact on service outside of current parameters.
4. Would you do that if you were in charge?
5. Decide on a collective vision rather than a narrow dictated one.
6. Use a rounded policies not bound by profit at the expenses of other considerations.
7. Give the environment space to breath and rejuvenate.



## **The presumption in favour of sustainable development**

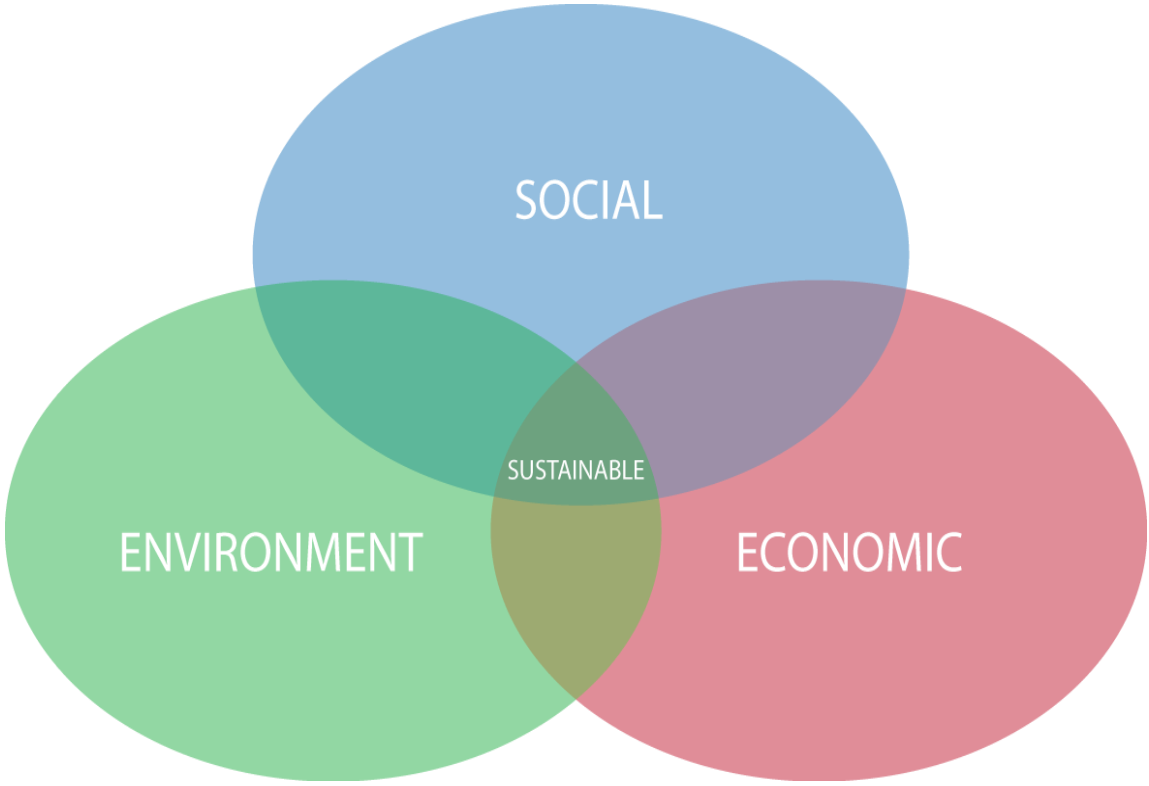
Para11 (NPPF). Plans and decisions should apply a presumption in favour of sustainable development.

### **For plan-making this means that:**

- a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>6</sup>, unless:
  - i. the application of policies in this Framework that protect areas or assets of particular importance provide a strong reason for restricting the overall scale, type, or distribution of development in the plan area<sup>7</sup>; or
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

### **For decision-taking this means:**

- c) approving development proposals that accord with an up to date
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date<sup>8</sup>, granting permission unless:
  - i. the application of policies in this Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed<sup>7</sup>; or
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.



## **Planning and the Environment the short version.**

A vibrant Tourism and successful Farming led economy.

### **Tourism**

With 60% of Wealden made up of the South Downs National Park and the High Weald Area of Natural Beauty one the biggest opportunity for growth is in the rural/green tourism sector. **A focussed policy to support Wealden Tourism.**

### **Grow – Farming**

The National Food Security Report 2021 highlights home grown food production has fallen to its lowest level since the second world war. Wealden being a predominantly rural district the opportunity to protect the economic growth in the food and farming sector should be utilised. **Policy: Farming infrastructure.**

### **Produce**

Harnessing the Grow - Farming concept commercial growth should be focused on converting the grown food into edible produce to feed into the general market and the tourism sector. **A focus on a Land Use data and Farming Policy.**

### **Consume**

Combining the Natural Beauty of the Wealden Area with the growth generated by the Grow, Produce the Out of Home Activities sectors will benefit and feed into the economy and employment opportunities at all levels of income. – **A policy to promote increased Wealden Self Sufficiency.**

### **Growth**

A focus on Wealden Tourism and the Rural economy, in combination with Grow, Produce and Out of Home Activities, pulls together a plan-led integrated economic strategy suited to Rural Wealden and combining it with a sound ecological plan fit for a 20-year period with environmentally sound sustainable economic growth. **A Growth Policy that is inclusive of all sectors and demographics within Wealden.**

# Green Tourism





## **Planning and the Environment the detailed version.**

### **Tourism**

Green (and Blue) tourism is very important economic activity across Wealden.

According to the United Nations World Tourism Organization (UNWTO, 2023), green tourism not only preserves the natural environment in local communities but also stimulates new tourism demand and promotes local employment. Therefore, it contributes to sustainable tourism that realises a harmonious cycle between the economy and members of the communities.

The World Bank has found that each pound invested in protected areas and nature-based tourism creates a sixfold return, helping boost green recoveries. (In Wealden's case this includes the blue economy for rivers, streams and the Cuckmere, Pevensy, and Birling Gap Seven Sisters)

Tourism policy – Farming and camping school holiday season (5 – 7 weeks fixed per annum?)

### **Grow - Farming**

The latest Food Security Report (2021) highlights the decline in the food we could produce in the UK has decline over the last 20 years to a level after exports of 54%, with the vulnerabilities in the world supply chain being exposed in February 2020 the opportunity for economic growth in the farming sector is self-evident.

Farming in protected landscapes is a grant scheme developed by Defra and delivered locally through National Parks and Areas of Outstanding Natural Beauty (AONBs) in England. The program aims to support farmers and land managers in carrying out projects that support the natural environment, mitigate the impacts of climate change, provide public access opportunities, or support nature-friendly, sustainable farm businesses. The program is part of the Agricultural Transition Plan and works alongside Defra's existing and new schemes. The program is open to all farmers and land managers in the English part of the Wye Valley AONB or where most of the benefit is within the AONB in Herefordshire & Gloucestershire.

Main stay of farming in Wealden e.g., Livestock, Food Production, Food miles, Viticulture the opportunities are endless.

[The program runs until March 2024 and is being operated locally by individual protected landscape teams](#) . [1. dartmoor.gov.uk](#) [2.gov.uk](#) [3. defrafarming.blog.gov.uk](#) [SFI Pilot: Learning from the Pevensy Levels land management plan](#)

Wealden Grant Scheme? £xxxK – current grant, ??future system changing how farms apply.

DEFRA subsidy policies are changing, Wealden policy needs to reflect needs? – guidance from NFU and leading farmers in area e.g., Montague Farm.

## **Produce**

Capitalising on the Grow strategy - promoting local manufacturing to support economic growth using locally grown ingredients is a great idea. It can help support local farmers and businesses while also reducing the carbon footprint of transportation.

An example of this is the Marks and Spencer's Ready Meal production plant at Hawkhurst.

Using this strategy also feeds into the Eat and Drink and consumer sector.

## **Consume**

Using the Tourism, Grow and Produce sectors the local hospitality economy would benefit by a eat and drink locally strategy.

The concept of farmers markets, street food markets, truck units and pop-up food vans are one of the growth areas in the sector and supports local farmers, revitalises urban, semi urban, and rural village locations.

The UK government has recently published a hospitality strategy that aims to increase the sector's resilience by helping improve profit margins, ensuring it can fully benefit from plans to revitalise high streets and put hospitality at the centre of local plans to regenerate those areas falling behind.

The strategy also aims to strengthen the hospitality workforce by equipping employees to succeed, attracting, and retaining the right people and providing clear and rewarding career pathways. (the local workforce requires local affordable housing 1-3 bed in line with average wages 20-39 group)

[It also encourages the sector to adopt innovative practices that empower growth, bolster productivity, and support the environment.](#)

## Commercial Opportunity

1. Eight planned Roundabout upgrades from Highways update - Boship through to Eastbourne?
  - a. Housing should be dependent on delivery of sufficient by providing highways and junction improvements.
2. We require clearly identified commercial needs for the Wealden community within the emerging local plan. The last 2019 plan had identified some of these needs. What is sustainable and assessed?
3. The Independent Group are against a growth corridor of London suburbia urbanisation throughout the A22 at the heart of Sussex – this does not provide sensible Sustainable policies and is out of character and appearance jarring in a Sussex Low/High Weald landscape important for Tourism, Farming and Local Nature Recovery and existing local community well-being /enjoyment.
4. Commercial need requires a genuine local need assessment in balance with the economy, social and environmental objectives with long-term nature recovery strategies. A balance between all three strands for the economy.
5. Farming Infrastructure: support within the local plan for a **Livestock Market** responding to the Farmers Forum, with additional capacity planned for future growth and market diversification. A supported **Abattoir**, possibly nearby or with the Livestock Market. All District Councillors to consider the location options to progress this urgently to release the old site in Hailsham - Consult options in Local Plan 2023 and deliver within four-year.
6. A review of why out of character excessive large industrial areas have come forward and rebalance to local economic need:-e.g., A new 77-acre Maresfield Business Park, Coppell Roundabout Proposal, Knights Farm North, Swallows and [Farningham Road Business Park](#) (we need to be mindful to avoid further traffic congestion across the A22 / A26, rural roads, and traffic crossing Ashdown Forest has already increased in an area of SSSI , SAC, SPA)
7. Where are the industrial units to date and conversion of local out of use farm buildings?
8. Do these commercial sites enhance job prospects for those that can afford the ever-rising house prices within Wealden?
9. Are the commercial sites in areas of the highest unemployment in least sensitive locations (low/high weald landscape character)
10. Are the size of some of the proposed units/warehouse unit's inline major logistical distributors with the locations so close to non-delivery area's (English Channel). Did John Lewis at Maresfield closed due to road infrastructure and wrong location for supply chain / logistics?
11. Are the sites interchangeable to reduce road traffic A22/A26, create better landscape character, design-led, homes, employment, and environmental benefit.

# Case Studies

## Hook and Son Hailsham

1. Hook and Son – Raw Milk Farmer/Producer – 1 retail shop London Borough Market and 10 other markets.
2. Hook and Son Borough Market Shop opened by Tom Parker Bowles and have serviced the London Food Scene since 2010.
3. Local Markets - Lewes
4. Unique: Only Raw Ice Cream, Yoghurt, Ghee butter, in the United Kingdom. Pioneered Raw Milk and Internet UK Delivery.
5. Farm to Plate: 6 vehicles, 20 full Time and 6 Part Time staff. Over 900 doorstep customers, includes local beef and other dairy food products.
6. Turnover: £1.5m per year and growing and expansion planned. Needs to maintain organic farm and additional nearby farm and would be welcomed.
7. Wealden Environmental Food Officers: are knowledgeable and very supportive, helped support and create expertise in Raw Dairy and Local Beef and are the go-to Authority for Raw Dairy and Local from other Councils.
8. Hook and Son – School Visits and a link into the education sector (supporting primary schools, secondary, GSSE/A Level / NVQ Curriculum) and encourage work experience and awareness of the vitality of farming and food production.
9. Links Small Farm Training Group with over 400 family smallholders. (South Brockwell Farm also providing food initiatives, awards and

Website: <https://www.hookandson.co.uk/index.html>



## Montague Farm

1. A model farm showing how growth can be achieved with approaches combining the rural, protecting endangered wetlands and species, biodiverse and modern expectations of a way forward in modern farming that should be front and centre of any Wealden Growth Plan. Diversification including events and weddings.
2. 700-acre Organic Farm. Livestock: Romney Marsh Ewes and Herd of Cross-bred cows
3. East Sussex Pony Club and Equine Sports
4. The Local Plan to recognise in Local Nature Recovery Strategies: The James Adler Wealden Nature Recovery Corridor to Link Pevensey Levels through to Ashdown Forest and connection to the Weald to Waves Ouse and Adur connection, linking Ashdown Forest with the Shortbridge Stream leading to the Ouse Corridor (providing a landscape wide nature recovery corridor and migration route for birds and species broad front Beachy Head / Seaford Cuckmere Valley)
5. Pevensey Levels: Work supported by Natural England for the flat wetlands. Marshlands support nature and endangered wildlife (RAMSAR of international importance and SSSI)
  - a) Pevensey Levels Marshland underpins the amount of wildlife found on the farm. Some 216 bird species have been recorded, though the commoner winter and ground nesting varieties are most valued. Winter flooding of the wetlands, with dampness extending into the Spring, attracts winter flocks of snipe, lapwing, teal, wigeon, shoveler and others. Springtime is when Montague Farm lapwing nest, along with a whole community of other birds of wet grassland.
  - b) The wetlands are home to many insects. More than 120 species of fly, 19 species of dragonfly and many types of snails and beetles can be found. A star of the farm is the Fen Raft spider, a rare but dramatic predator, large enough to eat small fish. SSSI Citation for Fen Raft Spider and ???a snail?
  - c) Over 100 wetland plant species can be found in the carefully managed waterways, from flowering rushes to rare stoneworts and pondweeds. This diversity has been encouraged out into the pastures, one field alone containing nearly 4000 flowering Greenwinged Orchids and over 20 species of grass.
6. Website: <https://montaguefarm.co.uk/our-farm/>

MONTAGUE  
— estd: 1943 —  
Livestock and Wildlife



## South Brockwell Farm

1. 47 Years of Family Farming: two daughters follow in father's footsteps.
2. Farm Shop: Local Produce traditional butchers shop includes homegrown free-range pork, lamb and goat meat, asparagus picking local farms and producers too, including everyday essentials such as milk, bread, pies, cakes, sauces, preserves and ice cream. Home-grown and local seasonal fruit and veg.
3. Commercial Sheep and Boer Goats
4. The Poacher's Pocket Cafe catering trailer.
5. Award Winning Food Production
6. Equestrian
7. Education Centre: Working with schools, families, education, mobile farm for events.
8. Website: <https://www.southbrockwellsfarm.com/farm-shop>



## Coopers Farm

1. Coopers Green Farm Hadlow Down 1. Sussex rare breed Pedigree grass-fed herd
2. Sussex Chickens, Gloucester Old Spot Pigs
3. Local Produce – Farmers Markets, Farm Shop, Pop-up Food
4. Demonstrates traditional farming can be successful in Wealden Sussex
5. Diversification
6. Practices traditional mixed rotational farming using historical breeds associated with the High Weald Area of Outstanding Natural Beauty.
7. The farm extends to 140 acres over 3 sites.
8. The farm currently farms beef, pork, chicken, turkey, seasonal vegetables, and eggs. We are proud that everything we sell is produced directly from our farm.
9. Website: <https://coopersfarm.com/>



## Farming Community – Independents Impression / Comments

1. The large community of local Farmers are not feeling wanted and should be recognised and supported within the Local Plan. Providing a focus with a plan-led system for the viability of a Rural Economy delivering the three strands – economy, social and environment. Farm definitions: smallholding, small, medium, large, estate?
2. •Wealden need to nurture the vital role of farmers across Wealden including farming, food production, tourism, nature recovery, landscape character and economy and ensure the Local Plan has captured their views PRIOR to finalising the release of the local plan for consultation (we are not just a London suburb economy, and the Independent Group wishes to reflect this)
3. The Independent Group also recognise the vital connection for the financial and economic services, entrepreneurial success, ecommerce and (words for London centric commute) which also needs to be assessed but with balance to the countryside farming needs of Wealden in balance.
4. A Local Plan, fit for purpose, will recognise this important farming economy and relationship within the district, the infrastructure needed for long-term health of farming across Wealden.
5. Grant and supported funding as DEFRA change models leaving EU.
6. Our Farmers need to be welcomed and supported. It is hard and many dairy farms closed changing the rural landscape –how can they be supported going forward.
7. Ability for Community – Land Farms – for those who wish to farm but are unable to secure funds. To allow farms to continue within Wealden – age profile of farmers is XXXX
8. The new Wealden Food Partnership provides a pivotal role and ongoing support / grants connecting people to farming, to increase further successes and collaboration with over 400 (?) farmers this pivotal role will need support in the plan.
9. Additional information sought regarding the large estate farms within the area – South Downs and across the Wealden District – District Councillors to advise the large estate needs and scale of these farms, infrastructure needs etc.
10. Policy required to deliver affordable local Agricultural workers cottages, per farm, policy, and tie to land – self build, policy for key farm worker or worked land retirement including AONB. 500 farms, what brownfield and diversification are possible but to meet CPRE advice, between 1 to 4 small cottages and a policy delivering this to potentially give an income or rented accommodation. Review Airbnb put in policy to ensure not too many drifts from local need. Tourism 1-2% tax
11. 2022 sewage releases, and Rivers Trust, catchment-based plan, River, and Stream Quality – what needs to happen to help this part of a river and wet watercourses improvement plan. Grants and Suds and other options discuss and plan urgent remedial, plan in the local plan to improve all watercourses including impact from farming.
12. Farming can and should be part of the [revitalization of our natural eco system](#). - **Policy needed to encourage this.**

**[A Government View Securing Food Security](#) “together will support our ambitious environment targets including to: - halt species decline in England by 2030 - treble woodland creation rates by the end of this Parliament - restore 280,000 hectares of peatland in England by 2050 - protect 30% of our land and sea by 2030 - improve soil health - reduce climate emissions by at least 6Mt CO2 equivalent per annum by 2035”**



## Large Estate Farms

1. Large estate Farms in Wealden are around xxx acres / hectares and are part of our exception test criteria.
2. To Identify Needs from the large estates
3. Tenant Farms
4. Policy: Agricultural workers cottages? 500 farms x 2 small in keeping cottages = 1000 dwellings
5. Policy: Commercial / Industrialisation of unused buildings (policy AONB / SDNP?) Avoid change to SDNP own policies.
6. Check CPRE requirements – pre-election there was a good list plus.
7. see their thoughts on SDNP permitted barn developments?

## Farming Community in Wealden and Rother (2 large rural districts in East Sussex)

Key land use, crop areas and livestock populations on commercial agricultural holdings in 2021 by Local Authority <sup>(1)</sup>

Local Authority <sup>(2)</sup>	Number of holdings
Rother	510
Wealden	987

Total farmed area (hectares)	Cereals (hectares)	Arable crops excl. cereals (hectares)	Fruit and vegetables (hectares)	Grassland <sup>(3)</sup> (hectares)
28,603	4,649	1,724	469	17,333
53,346	7,269	3,200	482	31,667

Cattle & Calves <sup>(4)</sup>	Sheep & lambs	Pigs	Poultry
8,060	95,018	796	23,908
19,872	85,111	2,096	379,974

## Agricultural workforce on commercial agricultural holdings in 2021 by Local Authority <sup>(1)</sup>

Number of people

Local Authority <sup>(2)</sup>	Farmers, partners, directors, and spouses full time	Farmers, partners, directors, and spouses part time <sup>(3)</sup>	Salaried managers	Regular workers full time	Total labour
Rother	342	458	47	95	1,209
Wealden	661	896	132	245	2,434



# Housing



# Wealden Housing Strategy

## Protected and Non-Protected Landscapes

**Housing Numbers** - 20-year plan the annual number should use the latest data available and not data that fits a national government agenda. Central policies that have failed should be ignored. Local need should be paramount Policies should be framed to ensure that young local people can remain local e.g., 21- 40.

**Rural Housing** - Should be based on rural economy needs, the policies should recognise that rural farming methods change and many farm buildings are now redundant due the use of contractors. Design-code, include Net Zero/Climate change – supply of water, solar, EV, battery, heat, sewage, water harvesting.

**Policy Actions Open Market Housing** - As with the housing register (which show 80% of housing need is for 1- and 2-bedroom properties, the local plan should reflect this through a specific policy for market housing to ensure local need is catered for at all levels.

**Infrastructure to support housing delivery** - Past, experience has shown that the drive for numbers has left current and future residents short of vital infrastructure (services, green and blue) that ensures wellbeing and restores conservation for environmental progress.

**General Housing Policies** - These should be based on the first and foremost current resident's needs. Once local need is fulfilled then a wider need may then be considered. The scope of infrastructure providers should be expanded to include those areas that are not currently covered.

Area code E07000065	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Average
Household increase based on 2018	681	665	641	589	591	612	595	563	519	526	598

Area code E07000065	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	Average
Household increase based on 2018	505	514	497	483	476	455	451	452	440	452	472

Household Increase Based Projections

Area code E07000065	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Increase
E07000065 2018 Household Projections	70652	71316	71958	72547	73138	73749	74344	74907	75426	75953	4775
Dwellings per year based on households											477

Population Based Projections

Average household size Table 427	2.29	2.29	2.29	2.29	2.25	2.25	2.25	2.25	2.25	2.22	2.26
2018 Wealden Population Projections	161427	162374	163318	164190	165046	165816	166574	167307	168004	168699	7272
Dwellings per year based on population											321

Time Period	2022 -2031	2032 - 2041
2018 Projections E07000065	598	535
2016 Projections E07000065	844	771
2014 Projections E07000065	872	819

These figures exclude Affordability Factor of 40%

1. The chart above illustrates the complexities and variations of calculations when using different methods to calculate housing needs. The Independent Group suggests that the 20-year plan period should be split into two initially, with the above Wealden area numbers (598) and (472) used in each of the plan periods as shown above but adjusted to the time period that has yet to be determined. Including the Permissions granted around 9000 times 2.3people per house. This will provide an estimate population growth of XX% and XX% and upgrade failing infrastructure planning for future economic need.

2. If the Local Plan 5-year revision is still in place, the housing need should be adjusted accordingly in line with current ONS Housing need reports (i.e., 2020, etc.). NPPF consultation 115% granted permissions included c.8500. [Wealden Migration Data 2010 2020](#)

## Housing Numbers (Background)

1. Currently the central numbers handed down are based on 2014 – 872 2022- 2031 this is then adjusted upward by affordability factor of 40% (349) giving 1221. (2014 Housing Need)
2. 2018 data gives a number of 598 for 2022 - 2031 excluding affordability factor (2018 Housing Need)
3. 2018 data gives a number of 472 for 2032 – 2041 excluding affordability factor (2018 Housing Need)
4. However, with the government holding back the 2020 Housing Need things may change again.
5. Current completion rates are on average of 750 over last 5 years which clearly shows developers control housing need from a market perceived position. ONS Data June 2023.
6. 8899 homes granted permission in Wealden are not built (Gadd, August 2023)
7. But this should be used in a Wealden context of 70% of completion are taken up by population migration from neighbouring authorities approx. 29% from the wider UK and 1% international migration.
8. Information Source - (East Sussex in Figures) (ESCC Housing Report 2021) (ESCC 2021 Population Report) (Household Projections 2023- 2043 ESCC) (ESCC Natural Population Change)
9. Figures show the last period (5 year?) Wealden built: council houses at 0, Custom / Self build at? social housing at? affordable housing at x 1bed, x 2bed, x3bed: see Slide Policy Actions and Open Market Housing?
10. **Nus Ghani advised 598** – see video parliament debate. Huw Merriman – see video. Maria Caulfield – see debate (Parliament TV)

[\(598 was taken from the 2018 housing need assessment publish by the Office of National Statistics\)](#)

At present the government use a 2014 housing need assessment to justify current numbers this can be found [here](#)

## Rural Housing

1. Wealden has approximately 60% protected area with a proportion of that controlled by the [South Downs National Park Authority](#)
2. Wealden are represented at the High Weald Area of Outstanding Natural Beauty along with other Authorities and HWAONB have a Planning and Design Code for rural areas and a High Weald Management Policy. Independent Group would like to use both these guides.
3. Policy - In protected areas of Wealden (excluding SDNPA) should adopt HWAONB policy on planning and design and management policy. Policy should use NCA121 Low Weald, NCA 122 High Weald, NCA 124 Pevensy Levels, and Wealden 2022 Landscape Character Assessment, 2017 Green Infrastructure Study, Sustainability consultation, DEFRA Keepers of Our Time May 2022, and Woodland Trust Planners Manual e.g., 100m ancient woodland case study.
4. Policy - Developments in Rural Areas should aim to support and enhance the farming community with a supply of low-cost housing (including Wealden controlled low rent dwellings as Cart Barn the first 15 dwelling built since 2006)? Agricultural workers and retirement policy: between 1 and 4 small cottages to support the farming community with agricultural tie supporting self-build and economic viability of the farm, AONB and High Weald policy landscape character to be provided.
5. Encourage the redevelopment of redundant buildings due to the current trend in employing contractors but restrict the boundary of the site to 15m around the redundant buildings?
6. Rural Social Housing need 10 times greater than city need, - Source [Rural Services Network](#)
7. Custom and Self Build Rural Policy

## Policy Actions Open Market Housing

Band	1 bed			2 bed			3 bed			4 bed			5 bed			Totals		
	Home - seeker	Transfer	Unknown	Home - seeker	Transfer	Unknown	Home - seeker	Transfer	Unknown	Home - seeker	Transfer	Unknown	Home - seeker	Transfer	Unknown	Home - seeker	Transfer	Unknown
A	15	8	0	26	5	0	5	3	0	3	1	0	1	0	0	50	17	0
B	6	21	0	7	5	0	2	7	0	1	1	0	2	1	0	18	35	0
C	76	41	0	45	21	0	29	47	0	7	10	0	1	1	0	158	120	0
D	122	59	0	75	58	0	23	20	0	3	4	0	0	0	0	223	141	0
Total	219	129	0	153	89	0	59	77	0	14	16	0	4	2	0	449	313	0
Percentage	46%			32%			18%			4%			1%			59%	41%	

1. The Wealden Housing Registered has policies that address the bedroom sizes needed for affordable housing (35%). Independent Group wish for minimum 35% affordable housing, plus design codes, to meet the bedroom quantity need identified. If developer wishes to provide 100% affordable a policy to ensure CIL money provided on all housing. It is the developer responsibility to deliver the promises made at planning regardless of viability statements following approvals.
2. Open market housing (65%) is mainly taken up by inward migration from outside Wealden is not covered by the current policy.
3. There is clear evidence that the local need in the open market sector matches the affordable sector.
4. Therefore, a policy is needed to cover the open market 65% to enable both the young (starting out) and those wishing to downsize and release larger properties into the open market. ([Housing Strategy 2020-25](#))
5. Housing evidence - Emerging Local Plan mentions bedroom 250 times and evidence appears to be underestimating house prices and the cost of rents. Local Need is on referenced on Page 157 Para 12.15 and seems to support the affordable policy for open market housing? Sadly, local need is only referenced 4 times and it needs a much higher profile.
6. ([Wealden Local Housing Needs Assessment August 2021](#))



## **Infrastructure to support housing delivery.**

1. The current system of infrastructure delivery is back end loaded due to the policy of fragmented planning applications within Wealden. Combined with a weak appeals system that favours government policy on housing numbers. (Note: appeals dismissed the costs should be used from the P&L build budget which then follows circa 300K costs versus 981K build bonus)
2. Policies to be more robust on infrastructure delivery at an earlier stage in the planning process, policies need to be in place to ensure that infrastructure needs are more prominent.
3. More emphasis need to be put on things like Personal Health Delivery, Adequate Service (Sewage and Water delivery) and locally accessible schooling (including special needs).
4. With a commitment to net zero access to public transport needs to be enhanced and consider more prominently at early stages of the planning system.
5. Do we need to be more realistic about housing need delivery with respect of a new town biased approach (public transport concentric?) and infrastructure led? Or, small local in keeping developments, organic growth to need of village and town.
6. Policy to prioritise Rural Social Housing, key worker, small village organic growth, and agricultural workers.
7. Blue Infrastructure: Suds, Sewage Water Management Plans, Southeast Water Management Plans. Southern Water Management Plans. Rainwater Harvesting, Water Course Changes due to greenfield development, (Insert ArcGis water course map link to be added to mapping portal) Long term flood risk map, restoration, and conservation of naturally fluctuating ecosystems (Freshwater Habitats Trust and Rivers Trust/OART restoration projects) The ecosystem and catchment of the Ouse, Cuckmere, Chalk and Trout Stream Headwaters to be conserved and protection. Policy for Aquifer protection supplying our water – Europe dry groundwater and Southeast Groundwater problems and over abstraction of rivers/quality.

## **General Housing Policies Summary**

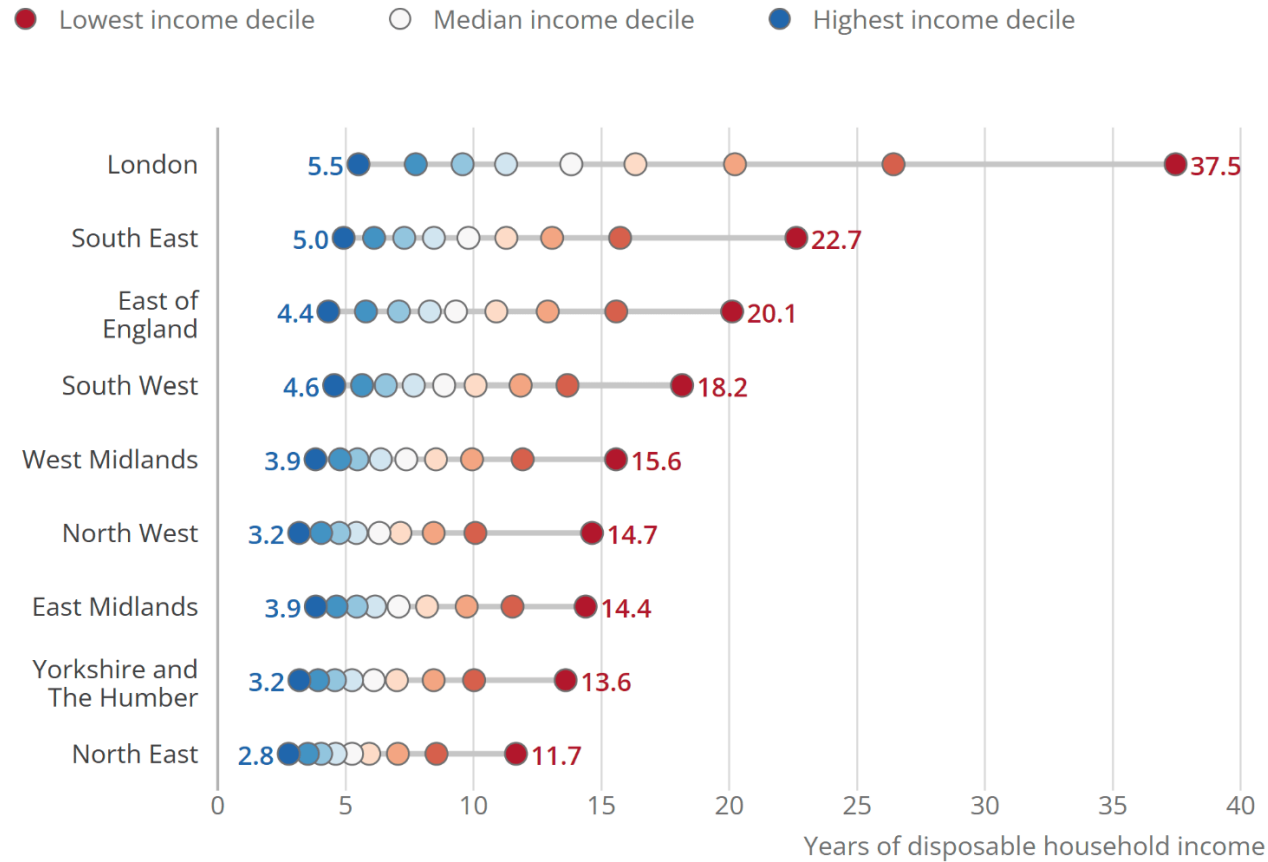
1. Policy for Open Market Housing bedroom housing allocation 1 bedroom, 2 bedroom and 3- bedroom meeting local need minimum 70-80%, policy priority for 20-39 housing need and 10% single story units. (for the retention of the younger population, downsizers, and disability)
2. Wealden Housing Need to be in line with most up to date data plus (and ignore the failed affordability factor) (Subject to Central Government NPPF Changes) and exception test.
3. 5-year Land Supply to use permissions (currently building is not in the hands of LPA)
4. All permission granted to have at least 50% agreement to be completed within 5-year period or uncompleted permissions withdrawn. (Subject to Central Government NPPF Changes to 115% of permissions granted)
5. Infrastructure agreed as part of the planning permission to be in place by the completion of 25% of the permissions granted. Infrastructure commitments to be advised and open transparency.
6. Non-Statutory Consultees given more weight and should include health and education providers.

## **Housing - Affordability,**

UK: 2022 – [Source ONS](#)

1. How do we build policies to bring affordability to Wealden, Affordability Factor has failed!
2. Lobby central government to cap agricultural land values or add 75% tax if sold for non-agricultural use above capped value which can then be used for rural social housing.
3. Wealden Rental Market updated (buy to let market about to change with mortgage changes)

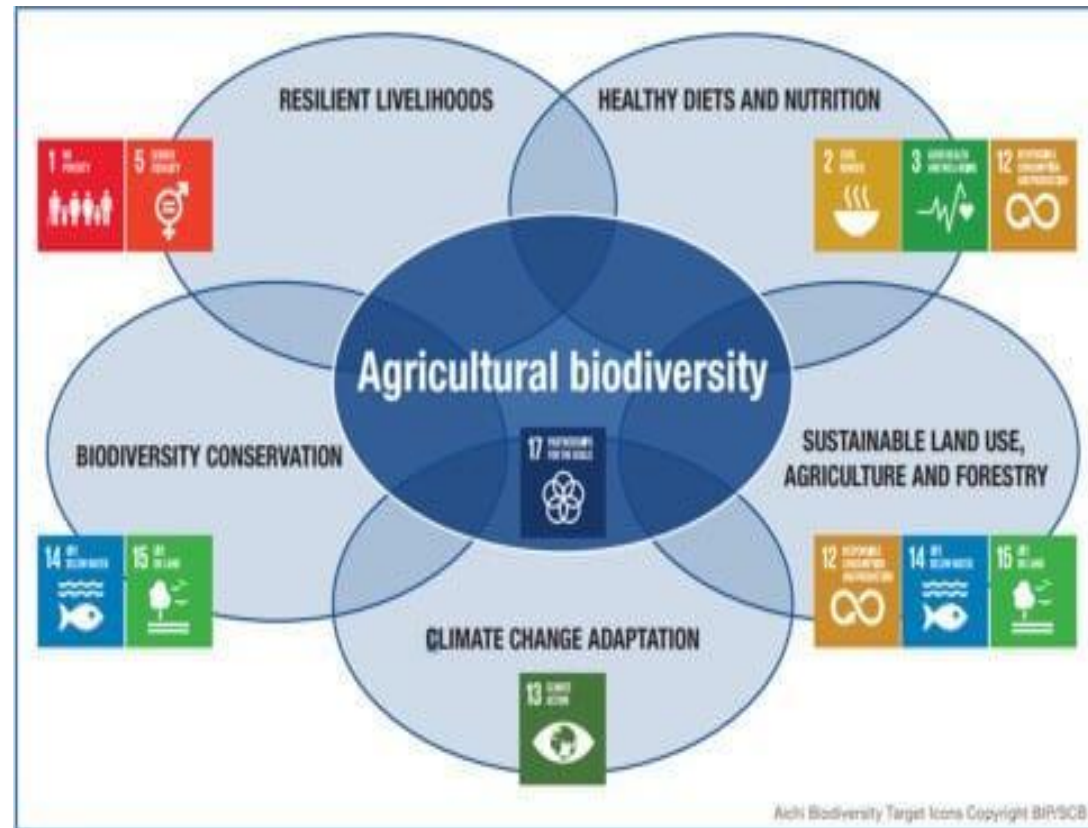
Number of years income equivalent cost of a median-priced home, by income decile, English regions, 2022



## **Housing Policies - To include.**

1. Halting Species Decline: A 20% Biodiversity Net Gain District – Minimum 10% on site, 10% towards habitat bank, Wealden specific Habitats of Principal Importance, Woodland natural regeneration and accessible green space.
2. Increase provision for Biodiversity and Woodland Officers
3. A list of conditions for every new dwelling – PV Rooftop Solar strategy (aim to be retrospective for c.9000 unbuilt), EV Charging, Battery Storage, Water Harvesting, Access to Green Space within walking distance.
4. Cycling provision Sustrans / Connectivity to nearest town/village stores
5. Safe Walking and Speed Limits, width of pavements for disabled, high need and school children etc.
6. Elderly Care provision in town / village centres for accessibility • Daniel – What do we need for Disability and future proof design code • Carbon neutral AND solar etc.
7. BNG and Habitat Creation to be in Conservation in Perpetuity, Management Plans for Suds and Habitats / Woodlands
8. Orchards and Allotments – Community Gardening • No Plastic grasses on new estates if gardens are counted in BNG.
9. Social Housing: Council house building programme,
10. Community-led involvement face to face meetings including District, ESCC Cllrs and Parish Councils – teams is prohibitive for free discussion and so an option to meet in person with TEAMS available.
11. Asking and working with Parish Clusters to increase robustness of the plan with this involvement. Review of parish maps excluding housing development
  - a. Neighbourhood Plan wishes (try and use Local Plan to make NP less burden)
  - b. List of Local Non-Designated Heritage Assets, Request parish for defined Protected Valued Character landscapes, Review parish Conservation Areas boundaries and recommend any new / expansion / street scenes – elections have changed parish councillors and reviews are needed before plan is released for consultation.
  - c. Shopping list of infrastructure and Services / Water / Sewage / Green / Blue Infrastructure
  - d. High Street / Village Provisions / Their parish farm and tourism needs
  - e. Commercial / Working / Industrial / Office
  - f. Economic (NPPF 8a)
  - g. Social (NPPF 8b)
  - h. Environment (NPPF 8c)
  - i. Well-being / Health / Leisure / Youth / Elderly / Disabled / Mobility access.
  - j. A parish view of SSSI / LWS / LGS / LNR halting species decline could consider sensible boundary reviews of these (there was a govt. policy to consider extension of SSSI)
  - k. Open Space Society – are there any reviews needed from their policies to protect green spaces.

# Biodiversity and the Environment



## Protected Watercourses

[BUFFERS / IRZ](#) [Ponds](#) [Lakes](#) [Catchment](#) [Headwaters](#) [Natural freshwater ecosystems](#) [Bogs / Ditches](#) [Stream Buffers 25m?](#)

[River Buffers 100m or 400m?](#) **Suds policy /mgt not wet woodlands or in buffers**

### [Blue Infrastructure Baseline monitoring](#)

**River Ouse**, River Cuckmere, **River Rother**, Important lakes and Priority Ponds, **Pevensey Levels**, Cuckmere Haven Blue Inf. **Wildlife LNRS Corridors**, Blue Buffers Zones, **natural ecosystems Chalk Streams / WFD / Sea Trout Spawning (clean river and headwater catchment policy)**

### [Water and Wildlife Planning](#)

Wildlife LNRS corridors

Improved policy Protected Wildlife areas reliant on “wet and water habitats.”

UK (HPI / SPI) Habitats and Species of Principal Importance – Priority Policies

A specific policy for Notable Sussex Birds and Species

Woodland Trust / DEFRA / RSPB/ SWT policy

## Treatment of Water

What is being Monitoring?

What needs to be monitored and by when?

Odour Mapping – policy no building?

Infrastructure to improve Odour?

Bathing Water Areas.

Monitoring Streams and Rivers (River Trust 2022)

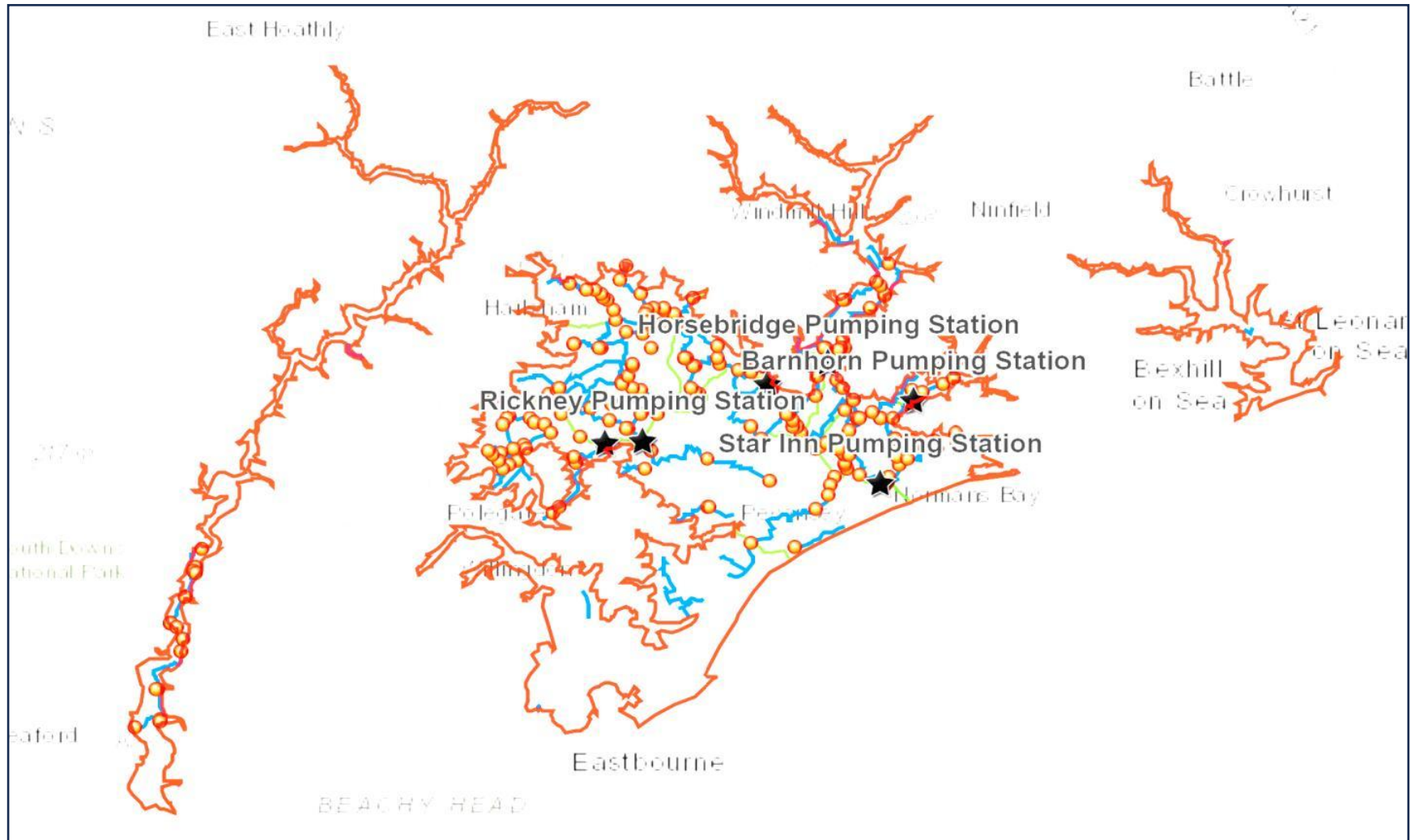
## Supply of Water

Protection Aquifers. Groundwater, Abstraction, Surface Water Management Plans

**Wealden Policy “Halting Species Decline 2023” – 30x30 25 EiP Woodland**

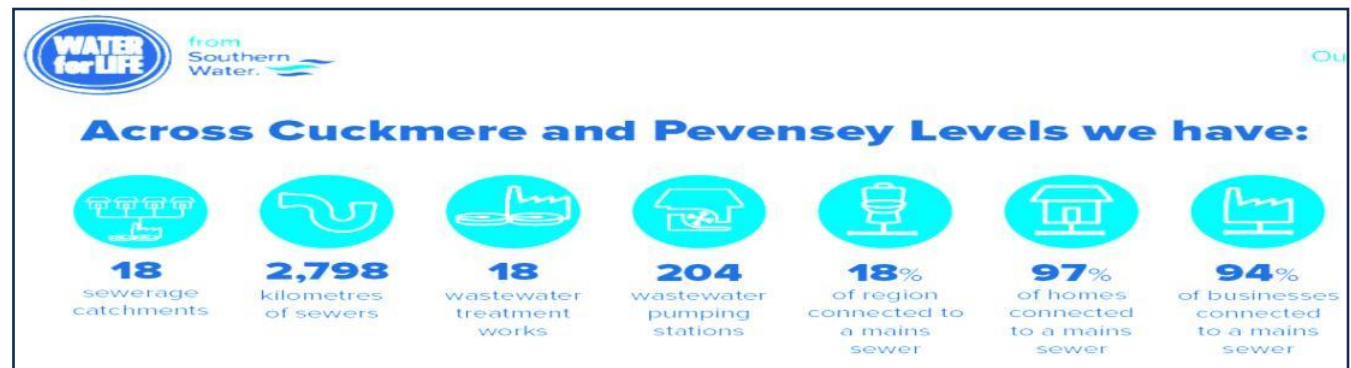
# Pevensy & Cuckmere

## Catchment Area



## **Pevensey & Cuckmere**

Southern Water information on the Pevensey and Cuckmere catchment area can be found [here](#)



UK government 2009 Cuckmere and Sussex Havens: Catchment flood management plan details can be found [here](#)

South East River Basin District Reports (Environment Agency) East Sussex is in section 2 [here](#)

Progress Report East Sussex Local Flood Risk Management Strategy Delivery Plan 2017-2018 can be seen [here](#)

The Blue Heart project - Understanding water in Eastbourne and south Wealden can be seen [here](#)

Pevensey and Cuckmere Water Level Management Board Bye Laws - [here](#)

Rother District Council Strategic Flood Risk Assessment (SFRA) 2021 - [here](#)

Wealden District Council Strategic Flood Risk Assessment (SFRA) (2022) - [here](#)

PCWLMB minutes from 2020 – [here](#) from WMLA Uploads – [here](#)

Accessing information in the river basin management plans, updated 2022 - [here](#)

Nutrient Neutrality and Mitigation: A summary guide - [here](#)

What the NPPF has to say - [here](#)

East Hailsham Modelling Technical - Note for Pevensey and Cuckmere Water Level Management Board [here](#)

## **Constraints on Planning –GREEN Infrastructure (land and heritage?)**

### **Protected and Landscape**

[Special Sites of Scientific Interest AONB](#), [National Parks](#) [Parks and Gardens](#) [Woodland and Ancient Woodland](#) [SANGS](#), [SACS](#) and [SPAS](#) [LWS](#) [LGS](#)  
[LNR](#) [National Monuments](#)

[BUFFERS / Impact Risk Zones](#), Woodlands, Habitats, Species, Designated, Non-designated, Biodiversity, Geodiversity

**Policy - Protected green space 30% each parish.**

### **Wildlife and Planning**

Wildlife LNRS corridors

Improved policy Protected Wildlife areas.

UK (HPI / SPI) Habitats and Species of Principal Importance – Priority Policies

A specific policy for Notable Sussex Birds and Species

Woodland Trust / DEFRA / RSPB/ SWT policy

**Accessible Green Space – [Find out more here](#)**



## Wealden Evidence - [WEALDEN DISTRICT COUNCIL OPEN SPACE REPORT APRIL 2022](#)

1. Ask Parish Clusters to review report.
2. Funding for conservation to restore current GI in report.
3. Policy each town a new nature reserve accessible to town walking
4. Policy: circular green/blue route round each town
5. Non-Designated and Designated Heritage assets Register.
6. MES / HER / ANA review
7. Update and new Conservation areas of interest not designated.
8. Local Non-Designated Asset List and process to update
9. Medieval and Mesolithic protected areas
10. Policy for Geodiversity

# Infrastructure

1. **Blue Infrastructure**
  - a. **Water Treatment (Sewage)**
  - b. **Surface Water Management**
  - c. **Farming Water – Extraction, Run Off, Nutrient Run Off**
2. **[Water Security - Collaboration urged as climate change puts water security at risk](#)**
  - a. **What policies can we put in place to ensure as a council we do not contribute to the further decline in home grown food we could produce?**
3. **Environmental Agency Concerns [Environment Agency objections to planning applications based on flood risk and water quality](#)**
4. **Environmental Agency recent views on water supply [Summary](#)**
5. **Policy - A registry of planned or promised infrastructure associated with approved and planned commercial and dwelling development?**
6. **Green Infrastructure**
  - a. **A policy to protect woodland and tree / hedge clearance, ploughing prior to development.**
  - b. **A policy to protect woodland, trees, and hedges – visibility splays.**
7. **Accessible Green Space – A study on the benefit to health can be found [here](#)**

## Protected Landscape

1. Policies need to reflect the need to protect [Priority Habitats Inventory \(England\)](#)
2. Policies need to reflect the need to protect [SSSI Impact Risk Zones \(England\)](#)
3. Policies need to reflect the need to protect [Special Areas of Conservation \(England\)](#)
4. Policies need to reflect the need to protect [Geological Conservation \(England\)](#)
5. How we are integrating this into the LOCAL Plan [WD2: Woodland improvement](#)
6. What Policies are included to identify Ancient Woodland Species Indicator [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions](#)
7. Policies needed to stop premature tree felling over and above [New powers to crack down on illegal tree felling](#)
8. Late James Adler policies to drive Local Nature Recovery Strategies and Landscape Recovery and pace and scale.
  - a) Weald to Waves linking Ouse and Adur through Ashdown Forest and Knepp. A new James Local initiative linking Pevensey levels to Ashdown Forest incorporating Shortbridge Stream, Buxted SSSI, Cysleys Fisheries planning linking a corridor of nature and Watercourses down to meet Pevensey Levels.
  - b) Support of Ashdown Forest becoming a National Nature Reserve by 2026, 100-year Anniversary of Winnie the Pooh and a 3-5km protection zone for the New National Nature Reserve ensuring enduring protection of Ashdown Forest, in honour of James Adler.

### [Protected sites and areas: how to review planning applications.](#)

### [House of Commons Environmental Audit Committee Water quality in rivers Fourth Report of Session 2021–22](#)

## Blue and Green Infrastructure

1. Ensure that we have policies that help to revitalise Rivers and Wetlands [Rivers and Streams](#) [Chalk Streams](#), (Bevern) Shortbridge Stream (sea trout)
  - a. [River Basins](#)
  - b. Catchment Based Approach - [catchmentbasedapproach.org](http://catchmentbasedapproach.org) [The Rivers Trust](#)
  - c. Policies to protect rivers and wetlands must [protect groundwater and prevent groundwater pollution](#).
  - d. Extraction closer to River Basins – restores river health.
  - e. Policy to protect aquifers and area like the Pevensey Level – Buffers Zones 400m (Policy)
  - f. Push for end-of-life Pevensey Levels pump renewal.
  - g. A policy is required to ensure that any development that will cause further deterioration and hinders watercourse improvement and requires that it be returned to good condition before development commences.

## Wildlife and Planning

1. Information on Wildlife and Planning – [here](#)
2. Wildlife corridors
3. Protect Wildlife areas.
4. How can protecting nature and wildlife help – a [United Nations View](#)

## Air Quality and Odour Control

1. Do current and future policies reflect current planning policy.
2. Current Air Quality (planning) dates back to 2019 - [here](#)
3. Will the emerging local plan have robust policies on Odour Control - [Guidance on the assessment of odour for planning](#)
4. Policy – Implement the installation of network of air monitors temporary and fixed and make the monitoring publicly accessible. Example - Measurements by [Sensor Community](#) contributors
5. Town Centres – Ensure Air Quality baseline testing in each town centre where there is regular congestion and queuing traffic (Crowborough, Heathfield, Polegate, Uckfield, Hailsham) – transparency to promote where these are located.
6. Odour and Noted problems – District Councillors to be asked for problems so aware of areas needing attention and plan infrastructure.
  - a) Hailsham – Sewage Odour near xxx planning application impact to Pevensey Levels
  - b) Uckfield Main Sewage Treatment Plant– Residents have suffered fly infestations for years (well-being, health, and safety issue we feel), treated by chemicals regularly at the treatment plant (impact to river ecology?)
  - c) Odour Areas – protected and no development to ensure no onward problems in the future. These areas could form nature recovery, woodland and rewilding UK BAP appropriate habitats and expansion area for treatment and surface water separation to prevent sewage outfall during surface water rain.

# SANGS, SAMMS, GREEN AND BLUE SPACE

## Accessibility to nature within home area

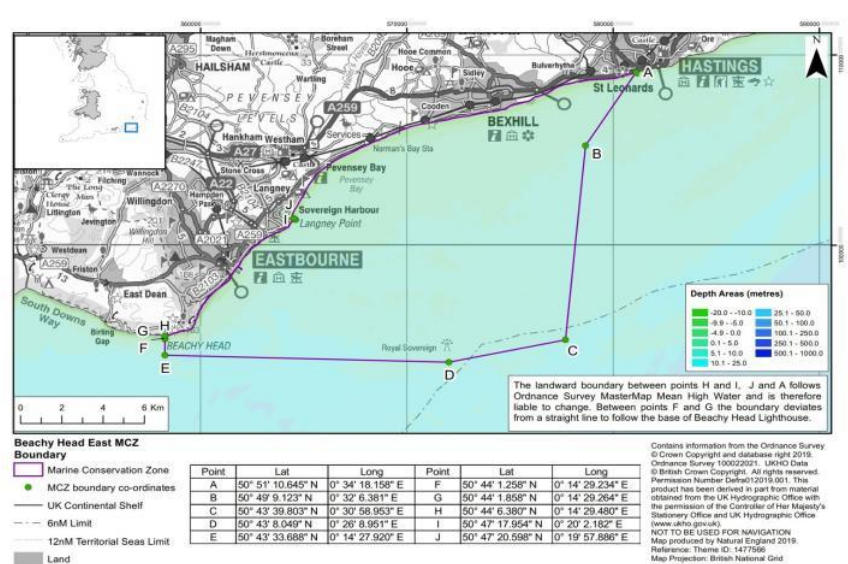
1. Review community access to nature including river walks and Wealden Green Space - policy addition for accessibility within ... km.
2. review methodology, visitor surveys of SANGS and SAMMS within Wealden – ENSURE EFFECTIVE HABITATS PRECAUTIONARY PRINCIPLES
3. Review policy for each development access to Green Space and contributions to local sites conservation where existing designated green space use will increase.
4. Current SANG car park methodology is promoting car use driving to our towns – 1<sup>st</sup> Policy step is use of green space within 400m and no car parks on new spaces, they are to be designed for local use accessible by sustainable means such as bus, walking, wheeling, cycling – our plan increases this to xxx metres and no car park.
5. A review of the SANGS and SAMMS policy by interested District Councillors prior to plan release. An updated policy will ensure SANGS are not created as drive through dog toilets. CPRE and other interested external organisations should be asked for their views on what works, what should be improved, what is not working.
6. To protect and look after existing residents the car park monitoring will be turned back on to include data as part of the package providing year on year car use monitoring.
7. Ancient Woodland, wet woodlands, ghyll habitats and Long-Established Woodlands will be excluded from all SANGS policies due to their fragile nature.
8. Investment in well-being and Increasing Footpath and Bridleway Network for sustainable accessible green space policy.
9. Cycling policy to be reviewed (though no cycling in woodlands, or at SANGS, designated or new Green Space). Off-road cycling does this need review for pleasure areas which will support this without harm to woodlands and nature sensitive areas?
10. Sustran's Policy and LCWMIP? For Wealden infrastructure deliverables to be reviewed, ensure accessibility for the less able and disabled.
11. A connected network of walking and cycling around each our towns to be formed - regeneration of areas to include cycle paths where space permits (3m with 5000 car movements? – areas of wide roads to work with ESCC Highways to establish separated cycling (separated possibly by hedgerows? To return character and nature recovery)
12. A new Wild belt Policy and a new Green Belt Policy to include green and blue connectivity.
13. Conservation and restoration funding to improve the condition of our SSSI and contributions to Nature Recovery of ALL the designated green spaces impacted by nearby development.

# Heritage and Non-Designated Heritage assets Register.

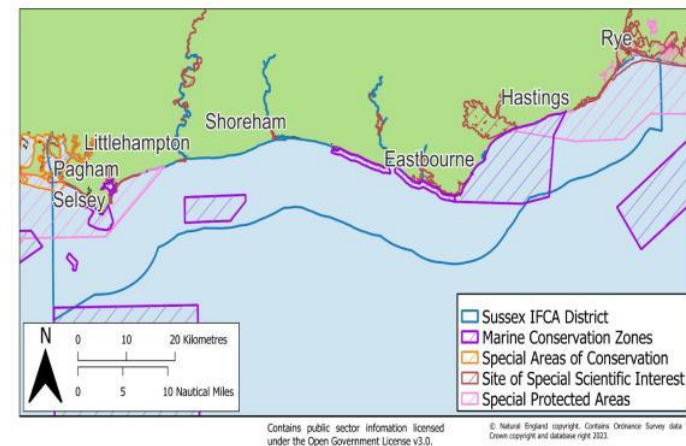
1. Historic environment [General Information](#)
2. Policy needed to develop a non-designated heritage registered did Wealden consider this [Local heritage list campaign: announcement of successful areas](#)
3. An Historic England View - [Local Heritage Listing: Identifying and Conserving Local Heritage](#) lessons from other areas and appeals
4. Non-Heritage Assets - [A different view](#)
5. Not-known and non-designated – an easy way to record in future.
  - a) Parish Clusters – check conservation area inventory, ask for proposed amendments, community engagement.
  - b) Parish Clusters – check HER, MES, HLA and ANA records and create Local Lists to capture Non-Designated Heritage Lists (changes in planning e.g., Mansard roof, ensure street scenes of local importance and area are identified in new list for Local Plan consultation per parish)
  - c) Parish Clusters – ask if there are other forms of records to include (ensure we have not overlooked local knowledge) and how records may be updated for local non-designated heritage assets or valued non-designated assets of importance to local historic interest (supporting NCA and LCA assessments)

## [Marine Conservation Zones: Beachy Head East](#)

## [MARINE PROTECTED AREAS - Sussex](#)



SUSSEX IFCA MPA MAP



## Nature Recovery

1. How will WDC input into the Nature recovery Strategy?
2. What policies will be in the emerging local plan to feed into the Nature Recovery Strategy?
3. Will the Marine Conservation Zones be part of it?
4. Will there be policies in relation to housing delivery that will be affected by Nature Recovery Strategy
5. Do WDC need a subcommittee to feed into the ESCC the Lead Authority in Region 48?
6. [Email ESCC Nature Recovery Team](#)





## Land Use Exception Test

Description (some areas overlap designations)	Land Use Square Miles	Land Use Square Hectares	Description Land Use Square Miles	Land Use Square Miles	Land Use Square Hectares
Ashdown Forest SSSI SAC SPA			Built Environment – towns and villages.		
Pevensey Levels SSSI Ramsar			Built Environment – Industrial/Commercial		
South Downs National Park / Seven Sisters Country Park			Farming – <b>987</b> number of farms and agriculture		
Heritage - Parks and Gardens E.g. Buxted, Sheffield Park			Green Infrastructure: Greens, LGS, LWS, LNR, SANGS, Commons,		
Heritage – National Monuments			Road Network (exclude urbanisation and dualling removing character landscapes)		
High Weald NCA122 (including transition to low weald zone)			Farming Land – Grade 1,2,3a,3b, 3c (Wealden Farms prosper on 3c and above)		
Area of Outstanding Natural Beauty			Climate Change – Wealden predicted land loss (not including current watercourses)		
Sites of Special Scientific Interest			Southern Water – Infrastructure		
Irreplaceable Habitat. Ancient Woodland, Plantation Woodland, Wood Pasture, Parkland			Southeast Water – infrastructure		
Priority Habitats includes Irreplaceable Habitat & Wealden Long-Established Woodlands			Reservoirs Bewl, Ardingly (including planned expansion Broad Oak and Ardingly)		
Watercourses – rivers and streams (Ouse, Cuckmere, catchment headwaters and streams)			RSPB / Sussex Wildlife Trust Nature Reserves and Woodland Trust Sites		

## Improve Digital Resources – informing decisions.

<p>Cadcorp – updates to include water catchment, LWS (750+ Sussex) LGS (120+ Sussex), ArcGIS watercourses, ArcGIS Priority Habitats, Woodland mapping (see Forestry Commission MAGIC) SHELAA colour coded. - built, approved being built, approved to be built, add qty. - Appeal dismissed and/or not suitable for development</p>	<p>National Character Assessments (NCA) - NCA 121 Low Weald - NCA 122 High Weald - NCA 124 Pevensey High Weald AONB - Design Code - Management Plan</p>	<p>ArcGIS - Priority Habitats - Watercourses - Ancient Woodlands Forestry Commission Woodland Mapping Flooding and Climate Change Map Unrecorded woodlands - AWI and Long-established identification not on maps (status within Wealden Planning)</p>	<p>DEFRA May 2022 Keepers of our Time Woodlands and Dormouse (Hierarchy, AWI, long established woodlands policy) <u>MAGIC</u> - Species - Habitats - Designations - IRZ's - Woodland Management/ schemes - High Spatial and(anti) fragmentation zones</p>
<p>- Woodland Trust owned Woods - Sussex Wildlife Reserves - RSPB Reserves</p>	<p>- National Trust - Parks and Gardens</p>	<p>- 2022 Rivers Trust Sewage - Environment Agency River ecology data</p>	<p>Natural England Citations SSSI, LWS, LGS, SAC, SPA, RAMSAR, NNR, LNR, Commons</p>
<p>ESCC LNRS – Responsible Authority. CIEEM Jan 2020 baseline On-site – BNG Off-site – BNG BOA? Protect BNG in perpetuity conservation. Management Plans Councils Green Spaces / Parish / Town</p>	<p>Woodland, Tree, and Hedge Policy - 1841 ESCC Tithe Maps - 1899 OS Maps - Woodland Trust Planners Manual - Woodland Trust Tree Inventory – automatic protection / TPO in plan - Satellite images - woodland not recorded status in planning terms - replant better protection and conservation - policy ancient woodland ground flora</p>	<p>- Wealden May 2022 Landscape Character Assessments, see map for areas Catchment areas and plan restoration and conservation BOA – conserve and protect. Wealden Land Use Wealden Population / Census</p>	<p>Rivers Trust Catchment Based Plan – Pevensey / Ouse / Cuckmere SuDs – Management plans and water catchment assessment (baseline / additions / working) River Ecological Conditions WFD Watercourses Chalk Streams Sea Trout Spawning areas/routes</p>

## Local Nature & Landscape Recovery – Policy and buffers

### Nature Conservation – Landscape Conservation – Natural Heritage Conservation

DESIGNATION	Policy reviews and update & Buffer. Consult in Local Plan to define policy community-led	DESIGNATION	Policy review and update & Buffer
Special Area of Conservation	National Policy or minimum 400m, strengthen local policy no increasing visitor numbers, no increase polluting traffic	SANGS	Car park monitoring New SANGS no car parks local use design concept to meet local need Visitor Surveys. Cllr review for plan
Special Protection Area	National Policy or minimum 400m, strengthen local policy no increasing visitor numbers, no increase polluting traffic	SAMMS	Habitats Directive SPA SAC Monitoring car usage across AF Monitoring car park usage AF Cllr. Revie for plan / CPRE update
RAMSAR International Importance	Policy to confirm, minimum 400m and no impact on watercourses . Baseline testing before new impact from now on	Policy Designation - Countryside Gaps between villages and towns	Enhance policy and ensure mapped rigorously for consultation (2019 plan has not worked)
Site of Special Scientific Interest – SSSI	Use Impact Risk Zone MAGIC maps, minimum 400m and extended dependent on citation. Map SSSI in Wealden on planning maps	Policy Designation - Protection of the Environment Check OEP after Mr Gove letter	Policy? Watercourse and Sewage (room for change to support councillors and officers)
National Nature Reserve – NNR	3 or 5km confirm and prepare new policy – Supporting Ashdown Forest in plan the period 2023-2043 AIM 2026 NNR celebration and protection	Bathing Waters	Review where we need bathing water policy to ensure health and safety of watercourses delivered (Downstream Balcombe / Anchor / Boating)
South Downs National Park – SDNP	By SDNP and Local Plan Policy	Parks and Gardens	Designated and Non-Designated
AONB / High Weald	By High Weald Policy and Local Plan Policy	National Monuments	Designated and non-designated

DESIGNATION	Policy review and update	DESIGNATION	Policy review and update
<b>Irreplaceable Habitat</b> <b>Ancient Woodland</b> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;">           Ancient woodland including:           <ul style="list-style-type: none"> <li>• ancient semi-natural woodland</li> <li>• plantations on ancient woodland sites</li> <li>• ancient wood pasture and parkland</li> <li>• infilled ancient wood pasture and parkland</li> </ul> <b>Ancient and veteran trees</b> </div> <div style="margin-left: 20px; margin-top: 10px;">} Irreplaceable habitat</div>	<b>100m</b> <b>(WT Local Plan case study)</b> <b>Wealden policy: Avoid harm (no mitigation unless footnote national infrastructure planning with planning)</b> <b>no Suds in buffers, no change in water hydrology, protect wet woodlands.</b> <b>Better protect and increase the resilience of ancient woodlands and ancient and veteran trees.</b>	<b>Woodland Policy</b> <b>Wealden Woodland %'s</b>	<b>no Suds in buffers, no change in water hydrology, protect wet woodlands.</b>  <u><b>Keepers of time: ancient and native woodland and trees policy in England</b></u>
<b>(Woodland linking ancient woodland and Long-established Woodlands).</b> <b>Priority Habitat Woodland Inventory</b> <b>Deciduous Woodland</b>	<b>50m</b>	<b>Hedgerow Policy</b>	
<b>Woodland Priority Habitat Network</b> <b>Policy and High Spatial protection</b>	<b>Policy to protect woodland management schemes (MAGIC?)</b>	<b>Tree Policy including Woodland Trust</b> <b>Tree Inventory protection and conservation</b>	<b>RPA policy enhance and add height of tree to protection area</b>
<b>Priority Habitats (not woodland policy)</b> <b>E.g., heathland, grassland, hay meadows</b> <b>(23 habitats identified in UK as priority)</b>	<b>Minimum 25m</b> <b>Identified on ArcGIS Natural England System</b> <b>Policy to update records of Wealden Priority Habitats</b>	<b>Distance from accessible green space</b>	<b>Write policy</b> <b>Create new nature reserves across Wealden (blue and green)</b>
<b>Freshwater ecosystems and headwater catchment areas</b>		<b>Chalk Streams and WFD Sea Trout Spawning Streams</b>	<b>Policy and buffer</b> <b>Problems with sewage and over abstraction</b>

DESIGNATION	Policy review and update	DESIGNATION	Policy review and update
Woodland Trust Sites	100m minimum	RSPB and Sussex Wildlife Trust Nature Reserve	Minimum 400m
Registered Commons		Medieval Landscapes (designated/non designated)	Protected as conservation areas
Check Open Space Society - OSS		Mesolithic Landscapes (designated / non-designated)	Protected as conservation areas.
Local Nature Reserves – LNR	100m	Local Wildlife Sites – LWS	100m
Local Geological Sites for Earth Science – LGS	100m	Local Green Space – LGS	100m
Millenium Greens		Village Greens	
Marine? Bathing		County Significant, Critical Natural Capital and/or County Significant Species / Habitats	
Country Parks		Sussex Notable Species – agreed by SWT / SxBRC?	
DESIGNATION	Policy reviews and update	DESIGNATION	Policy reviews and update
New Category: Landscape Conservation Area / Historic Landscape /	Call for Areas to be recognised in Local Plan – identified areas to be consulted, community to be asked to refer special landscapes to the local plan process is the proper forum for landscape value to be considered and for designations to be made.	Areas of Special Landscape are those areas worthy of conservation and enhancement which meets the high landscape quality of the AONB, outside of the AONB	
Duty of Regard AONB policy Raising the profile of the heritage landscapes High Weald and Pevensy Levels		Landscape setting – long views duty of regard AONB / Ashdown Forest / Cuckmere / Seven Sisters Duty of Regard	Policy to protect heritage landscape settings to be enhanced to protect long view ridge lines
Landscape with clear evidence of ecological, geological, geomorphological, or physiographic interest which contribute positively to the landscape		Assets of Community Value - review if any of these may be suitable local green space provision	
Dark Skies Policy		Nocturnal animal, Bat and Night Sky policy	
25yr Environment Improvement Plan - add Policies to the plan		30x30 Policies in plan	

## Bits and Bobs

Bobs	Design code	Land Use	Development 2019 MAPS
2015 United Nations Sustainability D. Goals	Solar PV and Battery storage every house	Protect Farms and Organic farming (soils take decades to establish)	Development boundaries put back on the plan for all towns and villages – rigorous defence and rigorous policy
BNG – what is lost? Deliverable of BNG, who monitors, who decides what BNG, we need	EV charging every house	Solar on Rooftop strategy not greenfield solar farms	Conservation Area reviews by each parish (use plans and appeals and new councillor knowledge base)
BNG - ensure not all habitats returned are the same, Wealden is a mosaic Removal of BNG prior to application (consequences and uplift)	Water harvesting and rainwater butts	Commercial rooftop solar strategy and consider wind turbine at commercial industrial area (not greenfield sites)	Add Digital Mapping Tools before allocation of sites - ArcGIS priority habitat, watercourses, long established woodlands, catchments, ancient woods, ASNW/Priority (Forestry Commission Woods good maps)

Bobs	Design code	Land Use	Development 2019 MAPS
BNG – Conservation and protection of restorable UK BAP/HPI Plan for the Rolls Royce of BNG – set good examples, expect good examples	Surface Water Mgt separate from sewage treatment	Car park and Council Buildings – check solar and wind strategy	30x30 30% of each parish protected where outside AONB and SDNP who have strict policy. To increase fairness for those outside boundary
Species of Principal Importance SPI – A plan to protect SPI in Sussex	Net Zero but must include solar energy production	Council – Net Zero home informed debate on current assessments	BOA linked for LNRS and Weald to Waves, Pevensey to AF before allocation of sites
Sussex Scarce Species receive additional protection	Suds design and mgt plan No Suds in buffer zones	EV Charging roll-out check current assessments	Conservation Area review before allocation of sites
Sussex Notable Birds to receive enhanced protection (SOS to provide information)	BNG – protected in perpetuity and mgt plan		Nature Corridors and LNRS review before allocation of sites (ESCC ?)

Highways: Road Infrastructure maintenance and programme	Heat solutions 2030 climate change		Sewage Treatment plants – polluting need to see if areas with no pollution to direct development
Consultees – Add SE Water, Southern Water, SWT / RSPB (SOS)/ WT	Wind solutions on development sites		
	Landscape for Nature Recovery and flowers for pollinators		

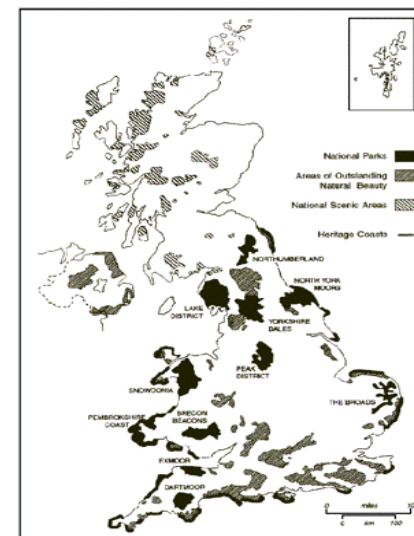
## References

- [Net Zero Strategy: Build Back Greener](#)
- [Government 25 Year Environment Improvement Plan](#)
- [Landscape Designations](#) - The James Hutton Institute
- [England’s statutory landscape designations: a practical guide to your duty of regard](#)
- [Assessing landscape value outside national designations](#)
- [BIODIVERSITY PACK HABITAT GUIDE WET GRASSLANDS](#)

## The Importance of Wealden Landscape

### Exception Test

1. Heritage Coastline and Downlands – Cuckmere, Seven Sisters and SDNP
2. NCA122 High Weald Geodiversity – Rock Outcrops – Internationally Important only four areas in the Worlds
3. AONB - map shows how important in landscape and wider context within UK categorised for its Area of Outstanding Natural Beauty
4. Ashdown Forest – Lowland Heath rarest habitat, ground conditions do not replicate well? Size of Isle of Man left?? Island James Adler said?
5. Ancient Woodland in the country – only 2-2.5% left, an irreplaceable habitat and Wealden custodian of holds x% of UK resources for scarce habitat.



- 6. Internationally well-preserved Medieval Landscapes should be protected and conserved inside and outside NCA122 and AONB**
- 7. Mesolithic environments**
- 8. Ask Archaeology team for environments they believe underrepresented in plan.**
- 9. Pevensey Levels RAMSAR – Internationally Important for Marsh and XXX**
- 10. Wealden are impacting many designated heritage landscapes and assets, and new District Councillors wish to test this at inquiry.**



## Landscape Exception Test

**Exception Test – High Weald and South Downs map shows size and importance of Wealden Landscape compared to England (Crowborough, Heathfield and some of Uckfield included in High Weald see map)**

1. What is the change to traffic across growth Wealden? The reality is there is a lot of traffic in this part of the Southeast – not reasonable when impact to landscape.
2. Urbanisation by dualling roads is not appropriate to protect heritage, woodlands, AONB, South Downs, not climate change led.
3. Local housing need not delivered and rural charm and character the district is cherished for is being lost.
4. Policy for design of housing required as the housing being delivered could be anywhere in the country.
5. How many villages:
6. Towns have taken number of built over last.
7. 5 years, 10 years 7.5% increase in population straining and broken nearly all infrastructure: water supply, sewage pollution, traffic, doctors / nurses, schools?

**Solution: 20-year plan led, community engagement, matched to local need and ONS data**

## National Character Area NCA122 High Weald

1. <https://geodiversitysussex.org.uk/geodiversity/SussexGeology.php>
2. Map unrecorded geodiversity rock outcrop sites add LGS Buffer Zones 100m.
3. LiDAR maps to be included in Local Plan mapping for each area (Geo and Watercourses).
4. Geodiversity Policy to match NCA122 and link LNRS to Geodiversity and Biodiversity.



1. The white area on NCA122 map includes High Weald transition to Low Weald
2. North Uckfield includes Geodiversity and Rock Outcrops meeting NCA122 character – West Park Local Geological Site, Lake Wood Local Geological Site, Budletts Common Rocks, The Warren Quarry Budletts.

## TICK LIST - Environment

<u>Name</u>	<u>Consult on Policy / Buffer</u>	<u>Name</u>	<u>Consult on Policy / Buffer</u>
<b>Local Nature Recovery Strategy</b>	The plan will include LNRS so that the ecological network is not compromised	<b>OEP Report. Office for Environmental Protection</b>	The HRA will be reviewed and assessed with OEP findings, and adjusted accordingly including a Wealden SANG Methodology
<b>Wildlife Corridors</b>			
<b>2030 Halting Species Decline</b>	The plan will ensure the LNRS, including species decline, is not compromised	<b>25-year Environmental Improvement Plan</b>	tbc
<b>Council Motion – Blue Infrastructure, Water. DEFRA Plan for Water?</b>	The plan will be led to ensure no loss, deterioration, or harm to blue infrastructure of key streams and rivers are protected with additional measures to protect important watercourses and catchments	<b>Linking designated sites within corridor</b>  <b>Conserve National Character Landscapes and those adjoining with the character landscape definitions</b>  <b>NPPF 15</b> <b>Identify nature rich corridors, habitats, wildlife, stepping stones</b>  <b>MAGIC map system and ArcGIS to inform.</b>  <b>NPPF 16 Linking Rural Parks and Gardens and other key habitats</b>	NNR LNRS Landscape NR SAC SPA Ramsar SSSI, LWS Sussex 700+ to connect to LGS Sussex Wide 100+ LNR AW / NFI LEW Streams Lakes Rivers Using Non-Fragmentation (MAGIC) and biodiversity and the protection of High Spatial Woodland
<b>Ashdown Forest</b> <b>SAC SPA SSSI AONB</b> <b>Common</b> <b>National Nature Reserve, connection leading Landscape Nature Recovery</b>	3km  The plan will be led based on a 3km zone for the NNR and LNR expected in the plan period before 2026.	<b>Pevensey Levels</b> <b>SAC RAMSAR SSSI</b>  <b>Nutrient Neutrality</b>	400m Duty to protect, restore and conserve  Moderate Condition (to prevent unintended consequences cumulative decline to poor condition OEP Post development monitoring HRA)
<b>South Downs National Park</b>	Own policies	<b>High Weald and AONB</b>	Own policies and in addition the policies will apply within the dotted boundary of NCA122 , LCA 2022, zone 6 2017 GI study

<b>National Nature Reserve?</b>	LNRS corridors to Link Ashdown Forest NNR landscape recovery to South Downs NNR's		
<b>Site of Scientific Interest SSSI</b>	Impact Risk Zone, minimum 400m and 2 <sup>nd</sup> line of IRZ – MAGIC maps	<b>Sites of High Nature Conservation Value</b>	Non-designated (define this like heritage missing records)
<b>Ancient Woodland (Evidence Woodland Trust Planning Manual case studies)</b>	Minimum. Starting at a 50m or 100m buffer.	<b>Long Established Woodland</b>	Minimum. Starting at 50m or 25m
<b>(Evidence Woodland Trust Planning Manual case studies)</b>	No SuDs or paths in buffer to protect AW	<b>DEFRA 2022 Keepers of Our Time – LEW 1893</b>	AW and LEW woodlands : Protection of buffer Protection and Conservation of Fragmentation Zones
<b>Including all definitions of AW (and open areas) and habitat mosaic supporting AW</b>	Irreplaceable habitat – only 2-2.5% in UK left, our duty to protect No change to quality of water or its water table	<b>Forestry Commission NFI MAGIC (including non-fragmentation areas)</b>	MAGIC maps woodland and high spatial priority OS1899 and 1841 Tithe maps identify.
<b>Functional Connectivity between AW and LEW</b>	Protection of functional connectivity between connected woodlands linking ecologically important areas , including definition on MAGIC and Forestry Commission Woodland Mapping adding Consultee Woodland Trust	<b>Ghylls and wet woodlands</b>	100m Minimum. Ghylls and wet woodland Priority habitat.
<b>Designated and Non-Designated</b>	Forestry Commission NFI MAGIC (includes non-fragmentation areas)		no change to water quality and hydrology of a ghyll watercourse. No directional drilling to ghyll habitat / streams to protect flora and fauna and diffusion across woodland
<b>BNG</b>	Harm to ancient woodland para 180c , will equate to a no net gain metric in site assessment as they are separate calcs	<b>BNG</b>	Baseline January 2020 Wealden is 20% BNG AW excluded from direct and indirect harm
<b>BNG</b>	Additionality for protected species is not included in net gain	<b>BNG</b> <b>Irreplaceable Habitats</b>	Ancient woodland policy Wealden policy is no direct / indirect harm loss or deterioration and will AVOID. Consult community that mitigation and compensation of ancient woodland in Wealden is not in the plan and will not be in a SANG.
<b>Local Wildlife Site LWS</b>	100m	<b>Local Geological Site LGS and High Weald Character Rock Outcrops in NCA122</b>	100m

<b>Local Nature Reserves and Millenium Greens</b>	100m	<b>SSSI using a minimum impact risk zone IRZ on MAGIC maps</b>	400m
<b>Woodland Trust and Forestry Commission Wealden Sites</b>	400m	<b>Wildlife Trust Sites</b>	Starting at 400m
<b>RSPB and Bird Sanctuary</b>	Starting at 400m	<b>Other sites reflecting Nature Conservation / Reserves</b>	Minimum 100m
<b><u>National Trust, Historic Significance</u></b>	<b><u>Rural Parks and Gardens, National Monuments</u></b> <b><u>Designed Landscapes (non-designated)</u></b> <b><u>GII*</u></b>	<b><u>Listed</u></b>	
<b>Woodland Trust Ancient Tree Inventory ATI</b>	Every tree or proposed tree included automatically as if TPO. And treated as a specimen tree and veteran tree potential planning policy	<b>Other UK Priority Habitats on HPI</b>  Lowland Heath (rare) Hay Meadows (97% decline) <b>UK BAP</b>	Minimum 25m or 50m?
<b>UK Species of Principal Importance</b>	Government list	<b>Sussex Notable Species</b>	SxBRC data also check NBN
<b>Landscape Character NCA122 High Weald NCA121 Low Weald NCA124 Pevensy Wealden - LCA 2022 and Green Study 2017</b>	ADD Geodiversity receives recognition as per NE508 and is protected 100m High Weald Rock Outcrops  Protected links to identified in BOA in LCA 2022	<b>Ecological connectivity</b> <b>Fragmentation</b> <b>Evidence based, protected in plan</b>  <b>NPPF Habitats</b> <b>Nature Rich Corridors Biodiversity</b> <b>Geodiversity Stepping Stones</b>	SSSI IRZ – 2 <sup>nd</sup> line High Spatial woodland Priority Network Priority Habitats AW / ASNW Priority Habitat Deciduous Woodland  National Evidence : MAGIC SYSTEM KNOWN AS “ <b>NATIONAL HABITAT NETWORK ALL HABITATS COMBINED</b> ” Protect Fragmentation zones
<b>James Adler Ashdown Forest and Pevensy Levels , SDNP, connection to leading Wealden Landscape Nature Recovery</b>	Weald 2 Waves LNRS to Pevensy, the Ouse and Cuckmere linking BOA areas (prevent fragmentation of BOA in LCA) Green and Blue infrastructure	<b>Blue Infrastructure</b> ArcGIS Surface Water courses Rother Ouse Cuckmere Bevern & Chalk Shortbridge	25m buffers  Headwater Catchment protection  Climate Change and Flood maps (2019)

<b>Medieval Landscapes</b> <b>NCA122 and NCA121</b>	Rare in Europe our well-preserved medieval landscapes will be protected.	<b>Mesolithic Rock Outcrops</b> <b>NCA122 and LCA 2022 / Green study 2017</b>	Geodiversity Conservation and Preservation of landscape setting 100m
<b>Parish and Towns outside AONB/SDNP</b>	<b>30% protected green and blue space new designation for each parish</b>	<b>Main Settlements consult , due to growth and change, additional compensation to affected communities</b>	<b>Priority for Nature and People Vision</b> <b>Acquire New walking accessible nature reserves per settlement</b>
		Lake Wood	
<b>Development Boundaries</b>	<b>No coalescence of existing settlements from town to villages.</b>	<b>Conservation Areas</b>	<b>Each parish asked to review their conservation areas and make recommendations</b>
<b>All mapped</b>	<b>EN17 remains for Uckfield Buxted Five Ash Down and Maresfield</b> <b>Check other villages</b>	<b>Community engagement</b> <b>Buxted SSSI to Lake Wood</b>	<b>Non-designated heritage assets</b> <b>Identified Conservation Wildlife Corridor</b>
<b>Major Developments and 9plus</b>	50m from existing residents to buffer change and create planting between, 130m prevent noise and fumes mitigation from major roads such as bypasses, A26, A27, A22	<b>Road capacity</b>	South advised.  North at capacity A22 Maresfield bypass and roundabouts - cumulative impact unbuilt A272 Ashdown Forest roads
<b>New Marine Conservation Zone / Area</b>	Catchment protection ?	<b>Rivers</b>	Headwater Catchments
<b>Trees and important Character Hedgerows</b>		<b>Ecosystems / Catchments</b> <b>WFD Groundwater and Surface Water</b>	
		<b>Aquifers</b>	

## HABITATS – needs work

Habitats of Principal Importance , formerly UK BAP, HPI are identified in the government literature. Some are of high distinctiveness and whilst covered in BNG explicit restorable, hard to create, habitats will be protected for restoration with strengthened policy in Wealden. Some habitats are very rare or difficult to create due to high distinctiveness such as lowland heath and acid grasses.

Description	Buffer	Description	Buffer
<b>Lowland Heath</b>			
<b>Hay Meadows</b>	97% decline in UK Restorable existing meadows will be conserved	<b>GEP – What is included in our Critical Natural Capital and include priority habitats</b>	

<b>Core Zones of Sustenance CSZ are habitat requirements for Bat foraging and habitat protection for Bechstein and Barbastelle connectivity, and Myotis sp. And other Sussex Scarce</b>	Core CSZ and bat buffer habitat areas established CSZ (see Surrey list) Bechstein Alcathoe Barbastelle Grey Long Eared Horseshoe ... Myotis sp. Must be surveyed to the physical species due to rarity in <i>Myotis sp.</i> & wider protection bat roost areas.	<b>Habitat Research</b>	Bechstein  Surrey CSZ
<b>Ancient Woodland Indicators</b>	Woodlands with more than 4-6 vascular indicator species will receive the same protection as Long-Established Woodland, the AW inventory is provisional and old woodland protected will be protected as 180c and Ancient Woodland where species indicate	<b>SANGS and Irreplaceable Habitats</b>	Irreplaceable habitats will not be used as compensation or mitigation for a SANG methodology as they are sites of high nature conservation value.  AW Ground Flora species indicators protected from SANG

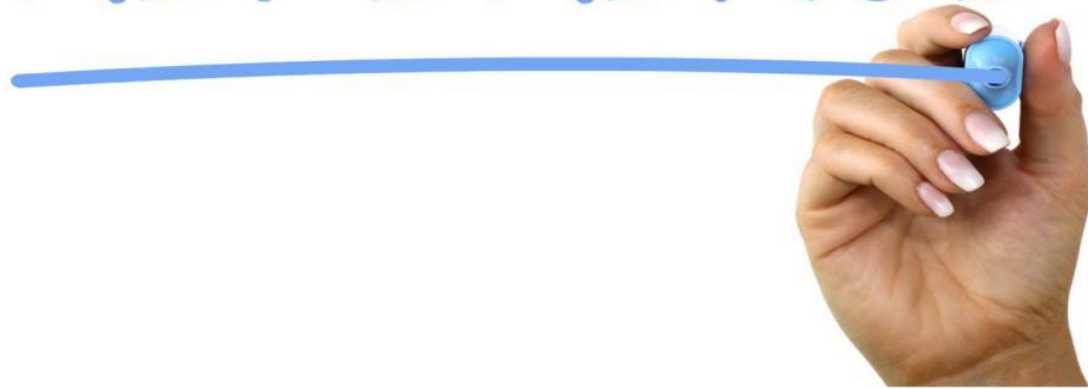
## SPECIES – needs work

Species of Principal Importance and Key Notable Species of Wealden are to be identified and policy strengthened at District Level for ecological important areas identified by the parish and town councils, or the Biodiversity Officer. Habitat loss prevented for priority habitats and species of importance from SPI (UK BAP Species)

Description	Buffer	Description	Buffer
<b>Sussex Scarce Bats</b>	See Surrey species list	<b>Bats</b>	CSZ
<b>Sussex Notable Birds</b>	SxBRC list and BTO / SOS	Prevention of habitat loss and conservation of habitat connectivity	Bats and Birds
<b>Woodland and Wetland Bird Assemblage</b>	S41 100m	Farmland Bird Assemblage	Tbc Turtle Dove
<b>AW Ground Flora</b>	Indicator species protected in woodlands (no translocation) and old woodland with AW indicators conserved	<b>Hazel Dormouse</b> <b>Water Vole</b>	Non-fragmentation of their habitats using AW and LEW connected woodlands
<b>Annex 1 species</b>		<b>Annex 2 species</b>	

<b>Ashdown Forest bird habitats</b>		<b>Lake Wood</b>	
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REFERENCE





## Statistics Inform - Independent Group

A community plan-led approach to meet Wealden genuine local needs.

### 3. Employment data

- a. Wealden unemployment rate is 3.3% +/- 1% with 58% Economically Active and 42% inactive. [Source](#)
- b. In commuting, out commuting. [Work related Travel](#) – Household Income by Local Authority [Source](#) – Family Resource Survey [Source](#)

### 4. Genuine Local Housing Need and Population Demographics – we should provide a sensible economic 20-year plan for stability for existing communities respecting our environment.

- c. \*65 + years: 24% increase (Census 2021).
- d. \*20-39 age group: xxx % DECREASE (families and working population support our economy and schools)
- e. Farming community agricultural workers needs and Village Primary Schools provision for future families to secure primary schools.
- f. Genuine Local Need demonstrates a town and village gentle organic growth in keeping with Wealden rural countryside (not urbanisation) need for 1 bedroom, 2 bedroom and 3 bedrooms for the Wealden community. Around 9000 permissions granted not built when the infrastructure is fit for purpose, watercourses are returned to good ecological condition and water supply are protected.

### 5. National Planning Policy Framework 2021 and NPPF Consultation

- g. NPPF 2021 refers to Local Plan Making, Community-led planning, Definitions of Sustainable Development, Economy, towns and villages, infrastructure, effective use of land, climate change, natural environment, Heritage etc which needs to inform the updated local plan for Wealden.
- h. NPPF Consultation and exception tests – Wealden should use Government statements and test at Public Examination Inquiry and note 115% of permissions 5-year land supply, and exceptional circumstances we feel include our rural land use stated below.
- i. A community plan-led approach to meet Wealden genuine local needs.

### 6. Tourism is a vibrant part of our economy and requires policy, investment, and support (consider a booking tax 1-2% to support P&L) and includes blue and green infrastructure.

### 7. Farming, Wine (viticulture) and Local Food Production is already a very successful part of our economy and requires recognition for achievement, investment, grants for land recovery and support.

- j. Number of Farms and Land in production farming should lead our local-plan led approach.
- k. Wealden Food Partnership (working with over 400 farms)

### 8. Local Nature Recovery Strategies, Land Use Data and Climate Change – A plan led system for the economy and natural environment, land use, nature recovery and climate change are required. An exception test for housing numbers should include the following: -

- l. AONB and South Downs cover around 60% of Wealden.
- m. Blue Infrastructure e.g., Watercourses (rivers and streams etc.) are a significant % in Wealden (Ouse and Cuckmere Catchment both rivers in poor ecological condition)
- n. Woodlands (ancient, wet woodlands, ghylls and long-established woodland coverage) Wealden Woodland is around XX% and one of most wooded natural Districts in England.

- o. Priority Habitats (ArcGIS – this includes woodland and UK Habitats of Principal Importance, required to be protected for nature recovery policies)
- p. Other designations outside of the above categories (Conservation Areas, SSSI, LWS, LGS, National Monuments, Parks and Gardens, BOA, NT/SWT/Woodland Trust/RSPB reserves etc.)
- q. Built (towns, villages, developed industrial/farm buildings % of land use) Recent Government Assessment Land Use overlooks land already has a use and not just the built environment allocation.

[Habitats and species of principal importance in England here](#)

## Reference Source

2021 Census Map Data for Wealden District can be found <a href="#">here</a>	Wealden District Withdrawn Local Plan <a href="#">here</a>	Natural England <a href="#">NCA Profile:122 High Weald (NE508)</a>
Natural England Open Data Geoportal can be found <a href="#">here</a>	Emerging Local Plan Evidence <a href="#">here</a>	Natural England <a href="#">NCA Profile:124 Pevensey Levels (NE478)</a>
Further information can be found <a href="#">here</a>	Emerging Local Plan Portal <a href="#">here</a>	Natural England <a href="#">NCA Profile:121 Low Weald (NE450)</a>
The East Sussex in Figures information portal <a href="#">here</a>	Land Supply an LGA Walk Through <a href="#">here</a>	Natural England <a href="#">NCA Profile:125:South Downs (NE432)</a>
All you need to know about Farming Statistics in England <a href="#">here</a>	Government View on Planning Conditions <a href="#">here</a>	Other Areas can be viewed <a href="#">here</a>
ONS Build a custom area profile <a href="#">here</a>	Wealden District Council Strategy 2023 – 2027 <a href="#">here</a>	The Pevensey Levels Wetland <a href="#">here</a>
Family food datasets in home and out of home <a href="#">here</a>	Wealden Landscape Character Assessment <a href="#">here</a>	Ashdown Forest Landscape Recovery <a href="#">here</a>
New laws to speed up planning, build homes and level up <a href="#">here</a>	Planning Policy Evidence Base <a href="#">here</a>	Pevensey Operational Catchment <a href="#">here</a>
Construction near protected areas and wildlife <a href="#">here</a>	OSM Land Use Interactive Map <a href="#">here</a>	Protected species and development: advice for local planning authorities <a href="#">here</a>
State of Nature 2033 Report <a href="#">here</a>	Sussex Biodiversity Areas <a href="#">here</a>	Prepare a planning proposal to avoid harm or disturbance to protected species <a href="#">here</a>
High Weald Management Plan 2019 – 2024 <a href="#">here</a>	Habitats and species of principal importance in England <a href="#">here</a>	Reptiles: advice for making planning decisions <a href="#">here</a>
Planning Permission for Farms <a href="#">here</a>	Biodiversity 2020: A strategy for England’s wildlife and ecosystem services <a href="#">here</a>	Land managers discuss opportunities created with biodiversity net gain <a href="#">here</a>
Agricultural facts: South East Region <a href="#">here</a>	East Sussex in Figures Wealden Profile <a href="#">here</a>	
Countryside Stewardship grant finder <a href="#">here</a>	Levelling-up and Regeneration Bill: reforms to national planning policy - <a href="#">here</a>	Strategic environmental assessment and sustainability appraisal <a href="#">here</a>
The Planet and People Coalition <a href="#">here</a>	Historic Weald Reference <a href="#">here</a>	
Life sciences competitiveness indicators 2023: life science ecosystem <a href="#">here</a>	Habitat extent and condition methodology, natural capital, UK: 2022 <a href="#">here</a>	ONS Environmental accounts <a href="#">here</a>
ONS Biodiversity and wildlife statistics <a href="#">here</a>	Heritage at Risk in the South East 2018 <a href="#">here</a>	Government Land Use Policy <a href="#">here</a>
Local nature recovery strategies <a href="#">here</a>	Historical Geo Reference Maps <a href="#">here</a>	Woodland natural capital accounts: ecosystem services for England, Scotland, Wales and Northern Ireland, 2020 <a href="#">here</a>
	Woodland in the UK <a href="#">here</a>	WDC Strategy and Vision <a href="#">here</a>
Documents from Lichfield’s (developer led business)		
Start to Finish (second edition) <a href="#">Here</a>	Understanding local housing needs <a href="#">here</a>	England planning news, August 2022 <a href="#">here</a> (latest)

# EAST SUSSEX COUNTY COUNCIL LOCAL CYCLING AND WALKING INFRASTRUCTURE PLAN

1. [LCWIP Public Consultation Results Report September 2021](#)
2. [LCWIP Public Consultation Results Report September 2021](#)
3. [East Sussex LCWIP Draft Summary October 2020](#)2.8 MB (PDF document)
4. [Appendix A - East Sussex LCWIP Part 1 Strategy](#)2.6 MB (PDF document)
5. [Appendix B - East Sussex LCWIP Part 2 - Infrastructure Plan.pdf](#)8.8 MB (PDF document)
6. [Appendix 1 ESCC LCWIP Policies](#)392.3 KB (PDF document)
7. [Appendix 2 Policy Review](#)354.9 KB (PDF document)
8. [Appendix 3 Equality Impact Assessment](#)811.1 KB (PDF document)
9. [Appendix 4 Governance](#)423.0 KB (PDF document)
10. [Appendix 5 Evidence of network development cycling and walking](#)392.8 KB (PDF document)
11. [Appendix 5A - Sustrans LCWIP Report Peacehaven Newhaven Seaford Final.pdf](#)63.5 MB (PDF document)
12. [Appendix 5B - Sustrans LCWIP Report Lewes Final.pdf](#)60.4 MB (PDF document)
13. [Appendix 5C - Sustrans LCWIP Report Eastbourne Final.pdf](#)115.0 MB (PDF document)
14. [Appendix 5D Eastbourne LCWIP Additional Information](#)284.7 KB (PDF document)
15. [Appendix 5E- Sustrans LCWIP Report Hailsham Final.pdf](#)32.9 MB (PDF document)
16. [Appendix 5F Hailsham LCWIP Additional Information](#)1.9 MB (PDF document)
17. [Appendix 5G - Sustrans LCWIP Report Bexhill Final.pdf](#)40.3 MB (PDF document)
18. [Appendix 5H - Sustrans LCWIP Report Hastings Final Part 1.pdf](#)21.5 MB (PDF document)
19. [Appendix 5H - Sustrans LCWIP Report Hastings Final Part 2.pdf](#)30.9 MB (PDF document)
20. [Appendix 5I - Sustrans LCWIP Report Uckfield Final.pdf](#)15.7 MB (PDF document)
21. [Appendix 5J Sustrans LCWIP Report Heathfield](#)8.2 MB (PDF document)
22. [Appendix 5K Sustrans LCWIP Report Crowborough](#)30.0 MB (PDF document)
23. [Appendix 5L Sustrans LCWIP Report Battle](#)10.0 MB (PDF document)
24. [Appendix 5M- Sustrans LCWIP Report Rye Final.pdf](#)80.5 MB (PDF document)
25. [Appendix 5N - Sustrans NCN Report Final.pdf](#)20.5 MB (PDF document)
26. [Appendix 5O - Walking Assessments - Technical Note](#)6.3 MB (PDF document)
27. [Appendix 5P - Cycle Propensity Outputs](#)633.8 KB (PDF document)
28. [Appendix 6 - LCWIP Prioritisation Framework](#)377.2 KB (PDF document)
29. [Appendix 7 - Active Modes Appraisal Tool Outputs](#)547.5 KB (PDF document)
30. [Appendix 8 - East Sussex Active Access for Growth Case Study 2018/19](#)1.2 MB (PDF document)

**NPPF – PPG – Reference**



## NPPF Reference

<p><b><u>1. Introduction</u></b> Paragraphs 1 to 6</p>	<p><b><u>2. Achieving sustainable development</u></b> Paragraphs 7 to 14</p>	<p><b><u>3. Plan-making</u></b> Paragraphs 15 to 37</p>	<p><b><u>4. Decision-making</u></b> Paragraphs 38 to 59</p>	<p><b><u>5. Delivering a sufficient supply of homes</u></b> Paragraphs 60 to 84</p>
<p><b><u>6. Building a strong, competitive economy</u></b> Paragraphs 85 to 89</p>	<p><b><u>7. Ensuring the vitality of town centres</u></b> Paragraphs 80 to 95</p>	<p><b><u>8. Promoting healthy and safe communities</u></b> Paragraphs 96 to 107</p>	<p><b><u>9. Promoting sustainable transport</u></b> Paragraphs 108 to 117</p>	<p><b><u>10. Supporting high quality communications infrastructure</u></b> Paragraphs 118 to 122</p>
<p><b><u>11. Making effective use of land</u></b> Paragraphs 123 to 130</p>	<p><b><u>12. Achieving well-designed places</u></b> Paragraphs 131 to 141</p>	<p><b><u>13. Protecting Green Belt land</u></b> Paragraphs 142 to 156</p>	<p><b><u>14. Meeting the challenge of climate change, flooding, and coastal change</u></b> Paragraphs 157 to 179</p>	<p><b><u>15. Conserving and enhancing the natural environment</u></b> Paragraphs 180 to 194</p>
<p><b><u>16. Conserving and enhancing the historic environment</u></b> Paragraphs 195 to 214</p>	<p><b><u>17. Facilitating the sustainable use of minerals</u></b> Paragraphs 215 to 223</p>	<p><b><u>Annex 1: Implementation</u></b> Implementing the National Planning Policy Framework.</p>	<p><b><u>Annex 2: Glossary</u></b> Glossary of terms used in this manual.</p>	<p><b><u>Annex 3: Flood risk vulnerability classification</u></b> Information on flood risk vulnerability classification.</p>

[NPPF Consultation response here](#)    [Ministerial Statement NPPF December 2023 here](#)    [NPPF December 2023 here](#)    PDF version

[Use of planning condition is here](#) – [Local Plan Making is here](#) – [Housing Delivery Test Information here](#)

[Lichfield's view on Dec NPPF 2023](#)

[Burgess Salmon NPPF December 2023 Changes](#)

## Planning Practice Guidance

<a href="#"><u>Advertisements</u></a>	<a href="#"><u>Air quality</u></a>	<a href="#"><u>Appeals</u></a>	<a href="#"><u>Appropriate assessment</u></a>	<a href="#"><u>Before submitting an application</u></a>	<a href="#"><u>Brownfield land registers</u></a>	<a href="#"><u>Build to rent</u></a>	<a href="#"><u>Climate change</u></a>	<a href="#"><u>Community Infrastructure Levy</u></a>	<a href="#"><u>Consultation and pre-decision matters</u></a>
<a href="#"><u>Crown development</u></a>	<a href="#"><u>Design: process and tools</u></a>	<a href="#"><u>Determining a planning application</u></a>	<a href="#"><u>Effective use of land</u></a>	<a href="#"><u>Enforcement and post-permission matters</u></a>	<a href="#"><u>Environmental Impact Assessment</u></a>	<a href="#"><u>Fees for planning applications</u></a>	<a href="#"><u>Fire safety and high-rise residential buildings 01/08/2021</u></a>	<a href="#"><u>First Homes</u></a>	<a href="#"><u>Flexible options for planning permissions</u></a>
<a href="#"><u>Flood risk and coastal change</u></a>	<a href="#"><u>Green Belt</u></a>	<a href="#"><u>Hazardous substances</u></a>	<a href="#"><u>Healthy and safe communities</u></a>	<a href="#"><u>Historic environment</u></a>	<a href="#"><u>Housing and economic land availability assessment</u></a>	<a href="#"><u>Housing and economic needs assessment</u></a>	<a href="#"><u>Housing needs of different groups</u></a>	<a href="#"><u>Housing for older and disabled people</u></a>	<a href="#"><u>Housing: optional technical standards</u></a>
<a href="#"><u>Housing supply and delivery</u></a>	<a href="#"><u>Land affected by contamination</u></a>	<a href="#"><u>Land stability</u></a>	<a href="#"><u>Lawful development certificates</u></a>	<a href="#"><u>Light pollution</u></a>	<a href="#"><u>Making an application</u></a>	<a href="#"><u>Minerals</u></a>	<a href="#"><u>Natural environment</u></a>	<a href="#"><u>Neighbourhood planning</u></a>	<a href="#"><u>Sport and Green Space</u></a>
<a href="#"><u>Permission in principle</u></a>	<a href="#"><u>Plan-making</u></a>	<a href="#"><u>Planning obligations</u></a>	<a href="#"><u>Renewable and low carbon energy</u></a>	<a href="#"><u>Rural housing</u></a>	<a href="#"><u>Self-build and custom housebuilding</u></a>	<a href="#"><u>Strategic environmental assessment and sustainability appraisal</u></a>	<a href="#"><u>Town centres and retail</u></a>	<a href="#"><u>Transport evidence bases in plan making and decision taking</u></a>	<a href="#"><u>Travel Plans, Transport Assessments and Statements</u></a>
<a href="#"><u>Tree Preservation Orders and trees in conservation areas</u></a>	<a href="#"><u>Use of planning conditions</u></a>	<a href="#"><u>Viability</u></a>	<a href="#"><u>Waste</u></a>	<a href="#"><u>Water supply, wastewater, and water quality</u></a>	<a href="#"><u>When is permission required?</u></a>	<a href="#"><u>Housing Delivery Test measurement rule book</u></a>	<a href="#"><u>National planning policy for waste</u></a>	<a href="#"><u>Planning policy for traveller sites</u></a>	<a href="#"><u>Planning for schools development: statement</u></a>

## **NPPF 2021 Summary/Conclusion**

1. The Independent Assessment is mindful of the NPPF and needs of the Wealden Community. We must “exception test”
2. Independents have proposed policies matching NPPF 2.8 for achieving sustainable development economic, social and environment.
3. Plan Making – polices are suggested to support community led plan making.
4. Decision Making –
5. Supply of Homes – Independent have reviewed the data and recommended policy numbers to match economic growth, population growth while infrastructure is mended, and Wealden specific exception tests are applied due to current land use constraints and infrastructure constraints.
6. Economy
7. Town Centres – we have suggested a community led approach during cluster meetings to assess all infrastructure and needs / shopping list for town centres (village centres included)
8. ?
9. Sustainable Transport – Independent have recommended? Daniel to advise as well.
  - a) Add some dev. Near train stations walking distance less than 10min, buses? walking / wheeling, Sustrans, reopening Uckfield-Lewes protect pathways.
10. High Quality Communications – our rural communities continue to struggle with poor connectivity to the Internet – policy?
11. Effective use of Lane – Independents have suggested an up-to-date assessment of how the land is used within Wealden to create a more coherent land use policy fit for the purposes of the Wealden District – being mindful of the character and constraints.
12. Well-designed places – Independents have suggested policy and documents and updates to meet better, beautiful well-designed places in keeping with the rural character of Wealden supporting a vibrant tourism and farming sector, with economic commercial industrial use and farming use assessments.
13. Protecting Green Belt – Independents are suggesting an update of various policies including 2023 halting species decline, woodland policies, protected character policies, potential wild belt and BNG, conservation areas to be reviewed and 30x30 30% of parishes protected meeting govt policy.
14. Climate Change and mapping has been requested ArcGIS and freshwater habitats protected in the plan, various policies suggested to meet climate change.
15. The Natural Environment –
- 16.. The Historic Environment –



