

**Ashdown Forest Statement of Common Ground**

Ashdown Forest Working Group

Date Issued for signing: Monday 22 September 2025

**Statement of Common Ground**

**Air Quality Impacts at Ashdown Forest**

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## 1. Introduction and Background

- 1.1 This Statement of Common Ground (SoCG) has been prepared by the Ashdown Forest Working group (AFWG) and is signed by the following participating members of the group:

### **Participating Members:**

- East Sussex County Council (ESCC);
- West Sussex County Council (WSCC);
- South Downs National Park Authority (SDNPA);
- Wealden District Council (WDC);
- Lewes District Council (LDC);
- Eastbourne Borough Council (EBC);
- Tunbridge Wells Borough Council (TWBC);
- Sevenoaks District Council (SDC);
- Mid Sussex District Council (MSDC);
- Crawley Borough Council (CBC);
- Brighton and Hove City Council (BHCC);
- Tandridge District Council (TDC); and
- Natural England (NE).

- 1.2 The following corresponding members have been consulted on and invited to sign the SoCG and may refer to it as part of any future HRA:

### **Corresponding Members:**

- Kent County Council (KCC);
- Surrey County Council (SCC);
- Hastings Borough Council (HBC);
- Horsham District Council (HDC);
- Rother District Council (RDC); and
- Tonbridge and Malling Borough Council (TMBC).

- 1.3 The purpose of this SoCG is to address the strategic cross boundary issue of air quality impacts on the Ashdown Forest Special Area of Conservation (SAC) that may arise from traffic associated with new development. It provides evidence on how the Local Planning Authorities (LPAs) have approached the Duty to Co-operate, clearly setting out the matters of agreement between members of the Ashdown Forest Working Group (AFWG).

- 1.4 The first section of the SoCG introduces the document and explains the background to this cross boundary strategic issue. The second section sets out key matters on Habitats Regulations Assessment (HRA) methodology for plan-making with which authorities have agreed. Finally, actions going forward and summary conclusions are given.

- 1.5 The SoCG identifies that participating LPAs consider they have taken a robust and proportionate approach to the evidence base in their plan-making process, producing in combination assessments which they consider have been undertaken soundly. Natural England notes that some of the approaches may differ and consider that it is up to individual LPAs to determine the specific approach they use. Natural England advises that approaches proportionate to the risk are acceptable and it is not necessary for all LPAs to use exactly the same approach.
- 1.6 Ashdown Forest is also designated as a Special Protection Area (SPA). It should be noted that this SoCG addresses the potential impact pathway of air quality on the Ashdown Forest SAC only and does not discuss matters of recreational pressure on the Ashdown Forest SPA. This is addressed through the working group of affected authorities that have assisted in the production of the Strategic Access Management and Monitoring Strategy (SAMMS) which together with Suitable Alternative Natural Greenspace (SANG) form the mitigation for the agreed strategic solution for the Ashdown Forest SPA.

### **Ashdown Forest SAC**

- 1.7 Ashdown Forest is a Natura 2000 site and is also known as a European site. It is a SAC designated for its heathland habitat (and a population of great crested newts). Further details regarding the reason for its designation are set out in Appendix 1. The Ashdown Forest SAC is wholly located in Wealden District, East Sussex as shown on the map in Appendix 2.

### **Habitats Regulations Assessment (HRA)**

- 1.8 The Conservation of Habitats and Species Regulations 2017<sup>1</sup> (known as the Habitats Regulations) require an appropriate assessment of the implications for the site in view of that site's conservation objectives to be carried out for any plan or project where there are likely to be significant effects on a European site, alone or in combination with other plans or projects. The Ashdown Forest SAC features are vulnerable to atmospheric pollution from a number of sources including motor vehicles. There is a potential impact pathway from new development and associated increases in traffic flows on the roads such as the A275, A22 and A26, which traverse or run adjacent to the SAC. The emissions from these vehicles may cause a harmful increase in atmospheric pollutants which may adversely affect the integrity of the European site.

### **Ashdown Forest Working Group (AFWG)**

- 1.9 The AFWG was established in May 2017 to seek cooperation and agreement to air quality monitoring and modelling as well as traffic modelling for the Ashdown Forest across all LPAs that might be affected by such issues. Participating members play an active role in the group and may as necessary contribute resources to any monitoring or advice. Minutes of meetings held by

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<sup>1</sup> [The Conservation of Habitats and Species Regulations 2017](#)

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the AFWG and any shared documents are also circulated to corresponding members who may then elect to become participating members if they wish. The group's participating and corresponding members are listed in paragraph 1.1 and 1.2 of this SoCG.

- 1.10 As set out in legislation, Natural England is a statutory consultee for HRAs and is providing advice on the outputs from the air quality modelling. The county councils, as well as independent consultants have provided advice in regard to transport and air quality monitoring evidence that has and is being undertaken to inform Local Plans.
- 1.11 The shared objective of the AFWG is to ensure that the impacts of development proposals in emerging local plans on the Ashdown Forest are properly assessed through their respective HRAs and that, if required, appropriate action is taken. The Working Group has agreed to work collaboratively on the issues, to share information and existing work, and to prepare this Statement of Common Ground. The notes of relevant meetings are set out in Appendix 3.

## 2. Key Matters

### Proportionality

2.1 There is no universal standard on proportionality and the issue relates to what is the 'appropriate' level of assessment required for Local Plans. Paragraph 36 of the National Planning Policy Framework (NPPF) (December 2024) states that for a local plan to be considered 'sound' it needs to be justified and based on an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. Government guidance on appropriate assessments<sup>2</sup> makes it clear that when implementing the HRA for land-use plans, that the:

*'scope and content of an appropriate assessment will depend on the nature, location, duration and scale of the proposed plan or project and the interest features of the relevant site. 'Appropriate' is not a technical term. It indicates that an assessment needs to be proportionate and sufficient to support the task of the competent authority in determining whether the plan or project will adversely affect the integrity of the site'.*

2.2 The AFWG agree the following principles:

- Where effects are demonstrably small, the level of assessment can be justifiably less complex than a bespoke model;
- Use of the industry standard air quality impact assessment methodology<sup>3</sup> can, if carried out robustly, provide the necessary evidence to inform an HRA on the potential effects of a development plan on the Natura 2000 network and Ramsar sites; and
- Members of the working group are entitled, but not required, to carry out non-standard or bespoke assessments; and other members may have regard to the results of those non-standard or bespoke assessments when conducting their own HRAs.

2.3 The approach outlined above sets out parameters for a robust and sound HRA, which is proportionate to the nature of the proposals and likely impacts. Where the spatial extent of the affected area is small, then the risk to the integrity of the site needs to be approached in a reasonable and proportionate manner as concluded in the Natural England Research Report (NECR205)<sup>4</sup> on small scale effects (i.e. for much of the 'affected habitat', SAC features are not present and therefore can be excluded from consideration). With the

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<sup>2</sup> [MHCLG Guidance on Appropriate Assessments](#)

<sup>3</sup> The principles in Annex F of the Design Manual for Roads and Bridges (DMRB), Volume 11, Section 3, Part 1 (HA207/07) for the assessment of impacts on sensitive designated ecosystems due to highways works, which Highways England use for all their HRAs, but with the DMRB spreadsheet tool replaced by an appropriate dispersion model e.g. ADMS-Roads and, with appropriate allowance for rates of future improvement in air quality.

<sup>4</sup> CHAPMAN, C. & TYLDESLEY, D. 2016. Small-scale effects: How the scale of effects has been considered in respect of plans and projects affecting European sites - a review of authoritative decisions. Natural England Commissioned Reports, Number 205.

remaining 'affected area', a proportionate approach to how this area contributes to the overall site integrity should be adopted.

### **Local Plan Housing Numbers**

2.4 The quantum of development expected in each LPA area is an important matter as it is a key input into any traffic model. LPAs will all be at different stages in their plan-making process and as such will cooperate in sharing information on housing delivery and targets to assist LPAs in the preparation of their respective HRAs to support Local Plans. It is therefore expected that each LPA will confirm housing numbers with individual authorities before running models, and these will represent the most up to date position in relation to their adopted or emerging Local Plans.

2.5 The following named authorities have no position regarding this approach for the following reasons:

- West Sussex County Council: WSCC is not an LPA for housing;
- East Sussex County Council: ESCC is not an LPA for housing;
- Kent County Council: KCC is not an LPA for housing;
- Surrey County Council: SCC is not an LPA for housing; and
- Natural England is not an LPA.

### **Sharing Data**

2.6 The participating and corresponding members of the AFWG agree to share any necessary data that will assist in the development of each local authority's HRAs and relevant models that feed into the assessments. This includes local plan housing and development numbers as identified above, along with any other information that is held by the participating and corresponding members that is requested and relevant to undertaking HRAs. Data should be provided as soon as is possible, as requested by HRA consultants or any other relevant organisation.

### **Traffic Modelling**

2.7 The AFWG have agreed that a bespoke approach to traffic modelling for the Ashdown Forest could be useful, and commissioned Jacobs consultants to develop a transport model that specifically considers the impacts on the Ashdown Forest. This would supplement and provide finer detail to the wider County-wide transport models that are used to test the impacts on Local Plan development for respective Local Plans. The baseline model was completed and became ready to use in November 2023. At this stage, no LPA has used the Ashdown Forest transport model to test the impact on their Local Plans, as the Local Plans currently at or been through examination had submitted their Local Plans before the Ashdown Forest Transport model was ready for use.

- 2.8 The following roads that either traverse through or are adjacent to Ashdown Forest are modelled and include the A22 (Royal Ashdown Forest Golf Course), A22 (Wych Cross), A22 (Nutley), A275 (Wych Cross) and A26 (Poundgate). For peripheral authorities (i.e. those that do not host the SAC) it is considered that impacts would manifest on main (A) roads in the first instance and in usual circumstances. Therefore, it is considered logical and reasonable to begin by modelling the roads where the impact will be highest and if, when modelling A roads, a conclusion of no likely significant effect is identified, then it is not considered necessary to go on to model B roads and minor roads.

### Geographic Coverage

- 2.9 This SoCG does not set out specific geographical coverage for traffic modelling work. It is therefore a matter for each LPA to determine if modelling is necessary having regard to other sources of traffic flow information, and, to the extent that modelling is considered necessary, the geographic coverage should be sufficiently extensive to enable reasonable and proportionate modelling of flows on Ashdown Forest roads.

### Base year validation

- 2.10 The suitability of the model to represent post-Covid traffic conditions will need to be assessed as the initial model had a baseline of 2019 for its traffic counts. Based on a comparison of the traffic data from 2019 to 2023/2024, it will be clear whether traffic flows are relatively unchanged, or if they have increased or decreased. If they have decreased or are unchanged, it will be appropriate to conclude that no adjustment is required to the model, because the model will likely be slightly overestimating traffic flows, which means the model is robust.
- 2.11 ESCC have provided data from the Transport Monitoring Team, which provides trip rates on routes across the Ashdown Forest where ESCC has permanent traffic counters in place. They have provided data for 2019, 2023 and 2024 and this includes full access to the complete set of flow data for each day and hour individually so that the data could be averaged manually. A commission is required for the transport consultants to validate the most recent traffic flow data to see if it is representative of the previous 2019 data sets, along with additional stages of assessment related to the further matters required in the following sections.

### Forecast year Assessment (2023)

- 2.12 If the flows have increased in the base year validation (which is considered unlikely at this stage), a 2023 forecast, known as a “forecast to the present day” will need to be produced, in order to compare the flows in that 2023 model against the observed flows. If they show that the 2023 model provides a good representation of observed flows, then again, no adjustment to the model is required. However, if the modelled flows are generally lower than the observed flows, then the model is underestimating the amount of traffic, which

could undermine any assessment (because the model is not 'robust'). Therefore, an adjustment would be required, which would be some form of uplift to the underlying trip generation. A commission would be required to undertake this adjustment.

### Forecast year Assessment (Local Plan Horizon Year)

- 2.13 A future year 'without local plan' scenario (i.e. inclusive of Temprow growth and committed development) should be produced as the reference case for the local plan impact assessments. If the previous stage (described above) produced a 2023 forecast and an adjustment to the demand was required, then the future year 'without local plan' scenario should be produced by forecasting forward from that adjusted 2023 forecast. Otherwise, the future year 'without local plan' scenario should be produced by forecasting forward from the Ashdown Forest 2019 base model. A commission would be required to undertake this part of the assessment as well as a decision required on the Local Plan horizon year.

### **Air Quality Monitoring**

- 2.14 In 2022, AECOM was commissioned to set up a monitoring network to measure nitrogen dioxide (NO<sub>2</sub>) and ammonia (NH<sub>3</sub>) concentrations at two transects and various monitoring locations in the area of the Ashdown Forest SAC / Site of Special Scientific Interest (SSSI). The initial monitoring period was for three years, and the results are from 30 May 2022 until 10 June 2025. Participating LPAs agreed to jointly fund this 3-year programme.
- 2.15 The monitoring survey is based on the June 2020 report, 'Recommendations for Post-2020 Air Quality Monitoring in Ashdown Forest', prepared by Air Quality Consultants and AECOM for the Ashdown Forest Working Group). The report and recommendations were made following an extensive monitoring campaign across Ashdown Forest SAC between August 2014 and March 2020<sup>5</sup>. The report outlined how the monitoring network could be restructured to reduce costs while still allowing useful information regarding air quality conditions in Ashdown Forest to be collected. The current monitoring network reflects that presented in the report.
- 2.16 The Local Site Operator (LSO) duties are performed by WeCare4Air but are managed by AECOM. The monitoring network comprises of:
- Monitoring of NO<sub>2</sub> concentrations using a network of diffusion tubes (26 sites, all in triplicate); and
  - Monitoring of NH<sub>3</sub> concentrations using a network of Adapted Low-cost Passive High Absorption (ALPHA®) samplers (13 sites, all in triplicate as standard for ALPHA samplers).
- 2.17 The locations of the monitoring stations are detailed in the annual air quality monitoring reports that are produced by AECOM and have been circulated to

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<sup>5</sup> [Ashdown Forest SAC: Air Quality Monitoring 2014 to 2020 – Main Report, May 2021](#)

the members of the Working Group. The publication of the annual air quality reports should be agreed in principle by the working group before they are placed on LPAs websites to support emerging Local Plans.

2.18 The purpose of the survey is to provide:

- Monthly mean concentrations of nitrogen dioxide (NO<sub>2</sub>) at locations ranging from zero to 200 metres from the roadside within the SAC/SSSI, and at locations representative of background conditions within the SAC/SSSI; and
- Monthly mean concentrations of reduced nitrogen, as µg/m<sup>3</sup> of ammonia (NH<sub>3</sub>) at locations ranging from zero to 200 metres from the roadside within the SAC/SSSI, and at locations representative of background conditions within the SAC/SSSI.

2.19 The monthly mean concentrations can be used to calculate long term mean concentration values, such as annual mean concentrations, that can be compared against relevant air quality standards for the protection of ecosystems. These standards are listed below:

- The critical level of 30 µg/m<sup>3</sup> of NO<sub>x</sub> (oxides of nitrogen) as an annual mean. This is set in the EU Ambient Air Quality Directive (Ref 2). This is transposed into UK law by the Air Quality Standards Regulations 2010 (Ref 3) for the protection of vegetation; and
- The critical level of 1 µg/m<sup>3</sup> of NH<sub>3</sub> as an annual mean for the protection of lichen and bryophytes. For all other vegetation, the critical level is 3 µg/m<sup>3</sup>. These are set by the Convention on Long-Range Transboundary Air Pollution (CLRTAP).

2.20 Collected data will be used to track long-term trends as well as to inform the model verification process following detailed air quality dispersion modelling. The AFWG will use this data for the development of the Ashdown Forest SAC dispersion model, to be used to inform the HRA of the member authorities' Local Plans.

2.21 The most recent advice from AECOM is that, whilst not essential, it would be beneficial to continue with the air quality monitoring up to December 2025 to ensure three full calendar years of data so that the baseline data is as up to date as possible when it is used for modelling purposes as part of each respective Council's HRAs. The following participating members have agreed to fund the additional seven months of monitoring:

- Wealden District Council;
- Tunbridge Wells Borough Council;
- Crawley Borough Council;
- Mid Sussex District Council;
- Sevenoaks District Council;
- Tandridge District Council
- Lewes District Council;

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- Eastbourne Borough Council; and
- South Down National Park.

2.22 The following participating members (who made contributions originally) are not able to help fund the additional seven months of monitoring:

- Brighton & Hove City Council.

### **Need for Mitigation or compensatory measures**

2.23 At present, published HRAs for adopted or emerging Local Plans have not concluded that mitigation or compensation is currently required for Ashdown Forest in relation to air quality.

### **3. Actions Going Forward**

- 3.1 The members of the AFWG will continue to work together constructively, actively and on an on-going basis toward a consensus on the matter of air quality impacts on Ashdown Forest SAC associated with growth identified in their Local Plans. The AFWG will continue to share evidence and information and will consider other measures to reduce the impact of nitrogen deposition around the Forest as matter of general good stewardship.
- 3.2 The Planning Practice Guidance<sup>6</sup> around the Duty to Cooperate process proposes as a minimum that a SoCG should be made available on a local authority website by the time they publish their draft plan, to provide communities and other stakeholders with a transparent picture of how they have collaborated. Once published, authorities responsible for the SoCG will need to ensure that it reflects the most up-to-date position in terms of joint working across the area. The AFWG recognises that this SoCG will need to be updated regularly in line with emerging government policy and to reflect emerging evidence and established knowledge of air quality impacts on European nature conservation designations.

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<sup>6</sup> See the PPG for [Plan-Making](#)

## 4. Signatories

4.1 This Statement of Common Ground has been signed by the following participating members and will be submitted by the members of the AFWG as part of the evidence base supporting relevant local authority's Local Plans.

### Participating Members:

<b><u>East Sussex County Council</u></b>	<b><u>West Sussex County Council</u></b>
Signature: [Redacted]	Signature: [Redacted]
Name: [Redacted]	Name: [Redacted]
Position: [Redacted]	Position: [Redacted]
Date: 23/09/2025	Date: 30/09/2025

<b><u>South Downs National Park</u></b>	<b><u>Wealden District Council</u></b>
Signature: [Redacted]	Signature: [Redacted]
Name: [Redacted]	Name: [Redacted]
Position: [Redacted]	Position: [Redacted]
Date: 24/10/2025	Date: 12/11/2025

<b><u>Lewes District Council</u></b>	<b><u>Eastbourne Borough Council</u></b>
Signature: [Redacted]	Signature: [Redacted]
Name: [Redacted]	Name: [Redacted]
Position: [Redacted]	Position: [Redacted]
Date: 28/10/2025	Date: 28/10/2025

<b><u>Tunbridge Wells Borough Council</u></b>	<b><u>Sevenoaks District Council</u></b>
Signature: [Redacted]	Signature: [Redacted]
Name: [Redacted]	Name: [Redacted]
Position: [Redacted]	Position: [Redacted]
Date: 24/09/2025	Date: 06/10/2025

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<b><u>Mid Sussex District Council</u></b>	<b><u>Crawley Borough Council</u></b>
Signature: [REDACTED]	Signature: [REDACTED]
Name: [REDACTED]	Name: [REDACTED]
Position: [REDACTED]	Position: [REDACTED]
Date: 22/10/2025	Date: 10/11/2025

<b><u>Brighton &amp; Hove City Council</u></b>	<b><u>Tandridge District Council</u></b>
Signature: [REDACTED]	Signature: [REDACTED]
Name: [REDACTED]	Name: [REDACTED]
Position: [REDACTED]	Position: [REDACTED]
Date: 05/10/2025	Date: 14/10/2025

<b><u>Natural England</u></b>
Signature: [REDACTED]
Name: [REDACTED]
Position: [REDACTED]
Date: 23/09/2025

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4.2 Corresponding members have responded to this Statement of Common Ground as follows:

**Corresponding Members**

<b><u>Kent County Council</u></b>	<b><u>Hastings Borough Council</u></b>
Signature: [REDACTED]	Signature: [REDACTED]
Name: [REDACTED]	Name: [REDACTED]
Position: [REDACTED]	Position: [REDACTED]
Date: 23/09/2025	Date: 14/10/2025

<b><u>Rother District Council</u></b>	<b><u>Tonbridge and Malling Borough Council</u></b>
Signature: [REDACTED]	Signature: [REDACTED]
Name: [REDACTED]	Name: [REDACTED]
Position: [REDACTED]	Position: [REDACTED]
Date: 07/10/2025	Date: 06/10/2025

<b><u>Horsham District Council</u></b>	<p><i>“HDC has evidenced through its HRA that the impacts of development planned for Horsham District Local Plan 2023-40 which is current under examination would not have had any significant effect on the Ashdown Forest SAC. HDC has committed to the preparation of a new Local Plan Review in its Local Development Scheme but has not begun any substantive work. HDC therefore confirms its status as a corresponding member, but considers it unnecessary to sign the SoCG at this stage and makes no comment on its content. HDC also confirms that it supports the aims of the Ashdown Forest Working Group and will if necessary review its position in light of evidence to be produced to support its new Local Plan”.</i></p>
Name: [REDACTED]	
Position: [REDACTED]	
Date: 30/07/2025	
<b><u>Surrey County Council</u></b>	<p><i>“While SCC considers agreeing a SoCG is beneficial in general, as SCC is not a Local Planning Authority for housing SCC does not consider the council’s level of interest in this matters warrants a SoCG including SCC, but has no cause for concern with regards the content of the SoCG”.</i></p>
Name: [REDACTED]	
Position: [REDACTED]	
Date: 26/08/2025	

## **Appendices**

## Appendix 1– Ashdown Forest SAC Citation

### EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora

#### Citation for Special Area of Conservation (SAC)

<b>Name:</b>	Ashdown Forest
<b>Unitary Authority/County:</b>	East Sussex
<b>SAC status:</b>	Designated on 1 April 2005
<b>Grid reference:</b>	TQ451306
<b>SAC EU code:</b>	UK0030080
<b>Area (ha):</b>	2729.00
<b>Component SSSI:</b>	Ashdown Forest SSSI

#### Site description:

Ashdown Forest contains one of the largest single continuous blocks of lowland heath in south-east England, with both dry heaths and, in a larger proportion, wet heath. The wet heath element provides suitable conditions for several species of bog-mosses *Sphagnum* spp., bog asphodel *Narthecium ossifragum*, deergrass *Trichophorum cespitosum*, common cotton-grass *Eriophorum angustifolium*, marsh gentian *Gentiana pneumonanthe* and marsh clubmoss *Lycopodiella inundata*. The site supports important assemblages of beetles, dragonflies, damselflies and butterflies, including the nationally rare silver-studded blue *Plebejus argus*.

The dry heath in Ashdown Forest is dominated by heather *Calluna vulgaris*, bell heather *Erica cinerea* and dwarf gorse *Ulex minor*, with transitions to other habitats. It supports important lichen assemblages, including species such as *Pycnothelia papillaria*. This site supports the most inland remaining population of hairy greenweed *Genista pilosa* in Britain.

The damming of streams, digging for marl, and quarrying have produced several large ponds in a number of areas of the forest. Although often largely free of aquatic vegetation there may be localised rafts of broadleaved pondweed *Potamogeton natans*, beds of reedmace *Typha latifolia* and water horsetail *Equisetum fluviatile*. These species are particularly abundant in the marl pits. Some of the ponds have large amphibian populations, including the great-crested newt *Triturus cristatus*.

**Qualifying habitats:** The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- European dry heaths
- Northern Atlantic wet heaths with *Erica tetralix*. (Wet heathland with cross-leaved heath)

**Qualifying species:** The site is designated under **article 4(4)** of the Directive (92/43/EEC) as it hosts the following species listed in Annex II:

- Great crested newt *Triturus cristatus*

This citation relates to a site entered in the Register of European Sites for Great Britain.

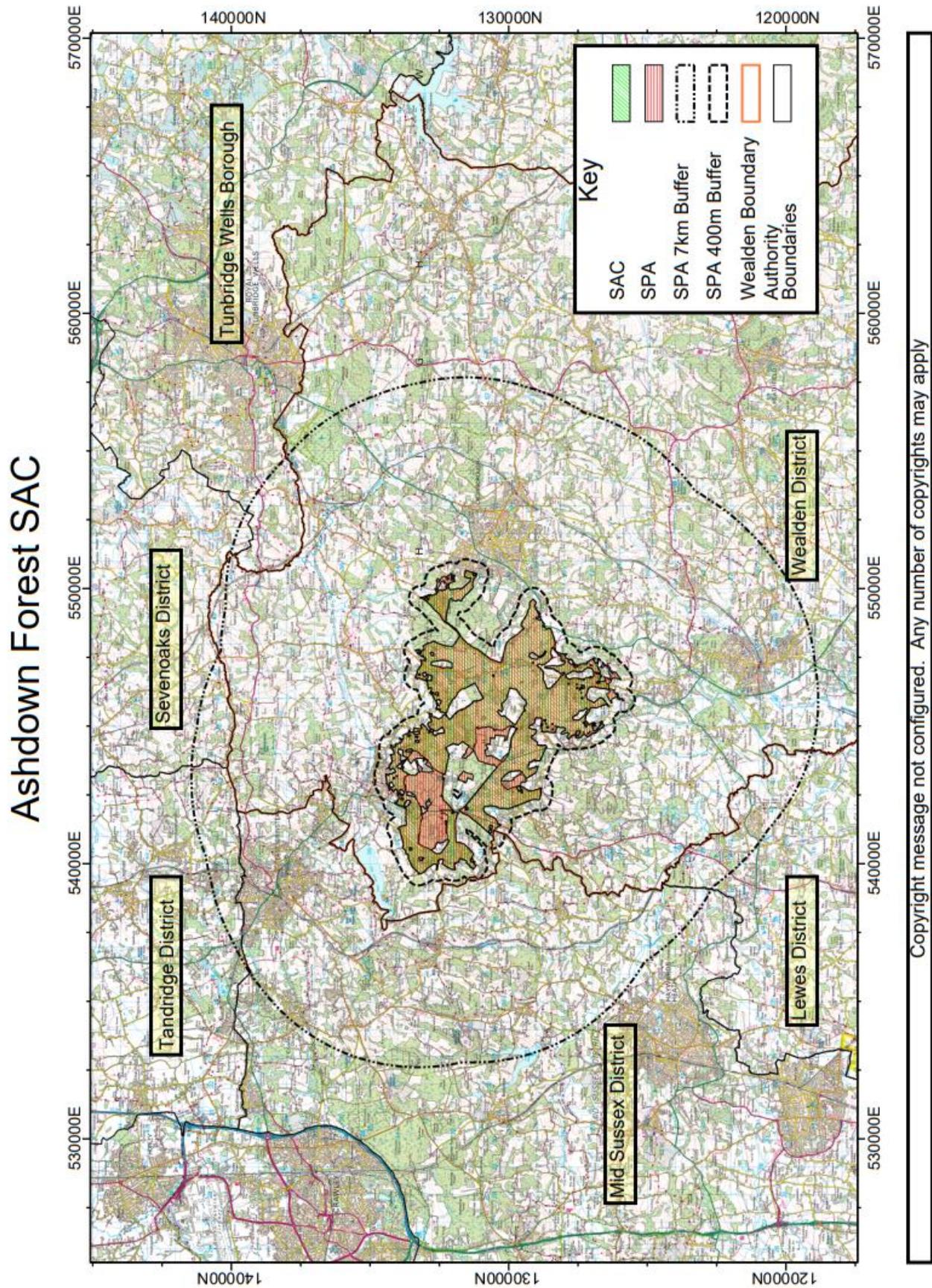
Register reference number: UK0030080

Date of registration: 14 June 2005

Signed: [REDACTED]

On behalf of the Secretary of State for Environment,  
Food and Rural Affairs

## Appendix 2: Map of Ashdown Forest



### **Appendix 3: Notes of Relevant Working group meetings**

November 2018 to April 2025

These meeting notes are a summary of officer discussions. The SoCG sets out the final positions of each of the signatory organisations at the time of signing and where there are discrepancies the SoCG takes precedence.

## Ashdown Forest Working Group

### Virtual meeting 22 April 2025 (2pm – 3pm)

#### Notes of meeting

#### Attendees

Authority	Name
South Downs National Park Authority	██████████ (Planning Policy Lead)
Natural England	██████████ (Lead Air Quality Sussex Sustainable Development Team)
Wealden District Council	██████████ (Team Leader PP) ██████████ (PP Manager) ██████████ (Head of Planning Policy, Economy and Climate Change)
Lewes and Eastbourne Councils <sup>7</sup>	██████████ (standing in for ██████████)
Tunbridge Wells BC	██████████ (Landscape and Biodiversity Officer) ██████████ (Planning Policy Manager)
Mid Sussex DC	██████████ ██████████
Tandridge DC	██████████ (Planning Officer)
Sevenoaks DC	██████████ (Planning Policy Manager)
West Sussex CC	██████████ (Senior Planner)
East Sussex CC	██████████ (Head of Planning and Environment)
Crawley Borough Council	██████████ (Planning Policy Manager) ██████████ (Planning Officer)
Tonbridge & Malling Borough Council	██████████ (Senior Planning Officer)
Rother DC	██████████ (Planning Officer) ██████████ (Planning Policy Manager)
Surrey County Council	██████████
Kent County Council	██████████ (standing in for ██████████)
Jacobs	██████████ (Senior Associate Director of Transport Planning)

#### Apologies:

██████████, AECOM

██████████. Horsham DC

██████████, Natural England

██████████, Kent CC

<sup>7</sup> For contribution purposes Lewes and Eastbourne Councils are treated as separate entities.

**1 Introductions**

Representatives on the group introduced themselves, as there were many new members since the last meeting in the Summer of 2023.

**2 Updates on the partnership and participation and any specific Ashdown Forest issues that members wish to raise.**

█ for TWBC advised that the schedule of contributions sent out with the minutes was incorrect and related to the Traffic Modelling costs. The correct schedule would be provided with the meeting notes.

**ACTION:** █ for TWBC to send correct schedule with meeting notes.

On behalf of WDC, █ provided an overview of the last meeting and rationale for calling this meeting. █ advised that work had been progressing since Summer 2023 and that the Zoning Study was now complete and signed off by Natural England. The Zoning Study was primarily for the members of the SAMMS Partnership and WDC will organise a SAMMS Partnership meeting soon once the financial data is collected.

**ACTION:** WDC to organise SAMMS meeting.

**3 The results and the report of the 2023/2024 Ashdown Forest Air quality monitoring and ongoing requirements:**

WDC highlighted the confidential nature of the report until a redacted version is made available for publication, given that it sets out the locations of the monitoring stations which have previously been subject to vandalism.

WDC summarised the report and noted that the overall trend from the two years monitored (2022-23 and 2023-24) was a reduction in deposition of nitrogen and ammonia although two monitoring stations still showed an excess to the critical load for nitrogen and one for ammonia. It was likely that the final years report, from 2024 to 2025 would show a similar trend. WDC recommended that a further two years of monitoring was needed to support HRA work for Plan making.

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In discussion, NE ( ) confirmed that the results were consistent with national trends but had reservations about ammonia. WDC confirmed that the suggestion for a further two years was to ensure robustness at examination.

Those who previously contributed to the study wondered if the work underway (including results) was already sufficient to support the HRA and also asked if NE had a view as to whether such further studies were required. In addition, it was noted that if fewer authorities decided to contribute, then the costs for each contributing authority would rise. NE was asked for their view and NE ( ) advised that the best available data is always preferred but agreed to take the question back to colleagues (including the previous advisor for NE for the Ashdown Forest) and seek a more considered response.

Contributors also expressed a desire to consult with their HRA consultants and as most were using AECOM, it was agreed that the chair would write to ( ) at AECOM on behalf of the group seeking a view on the proposal. All would consult internally about the possibility of funding and those not using AECOM would seek their own counsel.

**ACTION:** NE to advise on national trends, any issues with ammonia and position on the need for further monitoring.

**ACTION:** ( ) (TWBC) to contact AECOM for view on future monitoring.

**ACTION:** ( ) (TWBC) to circulate responses from NE and AECOM to AFWG by email and ask for expression of interest from each authority to continue with the monitoring so that we can gauge likely individual cost for those who may wish to proceed.

### 4 Ashdown Transport Model

( ) from Jacobs explained that changes to guidance and practice meant that some updates to the model should be considered. Firstly, taking account of COVID guidance (circa £15k) and secondly building in variable demand modelling (circa £40K).

From discussion with ( ) (Jacobs) and with input from ( ) (WSCC) and ( ) (KCC) it became clear that these were both likely to result in a small reduction in traffic flows and that leaving the model as is would in effect be a worst-case

## Air Quality Impact at Ashdown Forest - Statement of Common Ground

scenario, which might be more appropriate for Ashdown Forest. If and when anyone used the model, there would be a need to evidence the approach taken and the information for the ESCC model and updated traffic counts would be helpful in this regard.

It was not proposed to update the Traffic Model at this time but instead to set out clearly the approach that might be taken when using the model with regards to any additional information and data such as traffic counts in order to compare the 2019 counts with current levels.

**ACTION:** WDC/Jacobs to set out approach to be taken when using existing model.

### **5 Statement of Common Ground**

WDC agreed that they would still take the lead on a new statement of Common Ground for the AFWG.

**ACTION:** [REDACTED] (WDC) to set out the approach and timetable for SoCG by w/c 5 May 2025.

### **6 AOB - None**

### **7 Date of next meeting.**

POST MEETING NOTE: Actions will involve circulating information and receiving responses by email and subject to the outcome of those a further meeting may need to be arranged.

**Ashdown Forest Working Group**

**Teams Meeting**

**14:00 Wednesday 15 February 2023**

**Invitees**

<b>Participating Members</b>		
<b>Authority</b>	<b>Name</b>	<b>Email</b>
South Downs National Park Authority	██████████ (Planning Policy Lead)	████████████████████ ██████
Natural England	██████████	████████████████████ ██████
Wealden District Council	██████████ (Planning Policy Manager)	████████████████████
Lewes and Eastbourne Councils <sup>8</sup>	██████████	████████████████████ ████████████████████
	██████████	████████████████████ ████████████████████
	██████████	████████████████████ ████████████████████
Tunbridge Wells Borough Council	██████████ (Landscape and Biodiversity Officer)	████████████████████ ██████
	██████████ (Planning Policy Manager)	████████████████████ ██████
Mid Sussex District Council	██████████	████████████████████ ████████████████████

<sup>8</sup> For contribution purposes Lewes and Eastbourne Councils are treated as separate entities.

Air Quality Impact at Ashdown Forest - Statement of Common Ground

	██████████	██████████ ██████████
	██████████	██████████ ██████████
Tandridge District Council		
		<a href="mailto:LocalPlan@tandridge.gov.uk">LocalPlan@tandridge.gov.uk</a>
	██████████ (Chief Planning Officer)	██████████ ██████████
Sevenoaks District Council	██████████ (Planning Policy Team Leader)	██████████ ██████████
	██████████	██████████ ██████████
West Sussex County Council	██████████ (Senior Planner)	██████████ ██████████
East Sussex County Council	██████████ (Head of Planning and Environment)	██████████ ██████████
	██████████ (Principal Planner)	██████████ ██████████
Brighton & Hove City Council	██████████ (Principal Planning Officer)	██████████ ██████████
	██████████ (Planning Manager)	██████████ ██████████
Crawley Borough Council	██████████ (Planning Policy Manager)	██████████ ██████████
<b>Corresponding Members</b>		
Hastings Borough Council	██████████	██████████
Horsham District Council	██████████	██████████

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	(Principal Planning Officer)	
Tonbridge & Malling Borough Council	██████████ (Principle Planning Officer)	████████████████████
	██████████ (Planning Policy Manager)	████████████████████
Rother District Council	██████████ (Planning Policy Manager)	████████████████████
Surrey County Council	██████████	████████████████████
	██████████	████████████████████
Kent County Council	██████████	████████████████████
	██████████	████████████████████

**Apologies as of 15 February 2023**

██████████ KCC                      sub ██████████ KCC and ██████████ KCC  
 ██████████ ESCC  
 ██████████ TWBC                      Sub ██████████  
 ██████████ MSDC                      Sub ██████████  
 ██████████ T&MDC  
 ██████████ T&MDC                      sub ██████████  
 ██████████ SDC                      Sub ██████████  
 ██████████ RDC  
 ██████████ TDC                      Sub ██████████                      (Also unable to attend)  
 ██████████ NE

**Notes of Meeting AGENDA**

Agenda Item	Discussion Points	Action
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Air Quality Impact at Ashdown Forest - Statement of Common Ground

<p>1. Introductions and reasons for the meeting (■■■ TWBC)</p>	<p>Confirmed apologies and introduced any subs.</p> <p>Summarised correspondence since last meeting.</p> <p>Purpose to agree brief for traffic modelling.</p>	
<p>2. Notes of Previous meeting (■■■ TWBC)</p>	<p>Comments on Actions:</p> <p><b>■■■ (WDC) to contact NE regarding a replacement</b></p> <p>■■■ confirmed as NE contact but agreed to discuss NE response under AOB.</p> <p><b>Action – All to confirm in principle agreement to contribute on an equal share subject to formal quotation.</b></p> <p>All confirmed.</p> <p><b>Action – ■■■ (WDC) to ask for formal quote from Jacobs.</b></p> <p>Brief circulated - quote to be obtained following todays meeting</p> <p><b>Action – ■■■ (WDC) to talk to ESCC about doing the procurement.</b></p> <p>Procurement through ESCC no longer possible. ■■■ (WDC) proposed to procure through WDC using framework agreement. All agreed</p> <p><b>Action – ■■■ (MSDC) to let ■■■ (TWBC) and ■■■ (WDC) know which date MSDC need this model.</b></p> <p>■■■ (MSDC) confirmed that output likely to be needed March/April</p> <p><b>■■■ (WDC) to prepare and circulate agreement and raise invoices.</b></p> <p>In hand</p> <p><b>■■■ (WDC) to circulate draft SoCG</b></p> <p>As this will be based on what is agreed for traffic modelling any draft will be</p>	

Air Quality Impact at Ashdown Forest - Statement of Common Ground

	<p>circulated after traffic modelling is agreed.</p> <p>Proposed change to minutes:</p> <p>█ (WDC) Page 5 Comments by █ (WDC) re use of model – change agreed.</p> <p>█ (TWBC) Page 5 Comments by █ (TWBC) re use of model by developers – change to make it clear that this needs to be agreed by AFWG. – Change agreed</p>	<p>█ (TWBC) to circulate corrected minutes</p>
<p>3. Any updates on local plan timetables/HRA – only if needed (All)</p>	<p>█ (CBC) – Crawley LP now progressing as issues around Nutrient Neutrality have been overcome. Subject to Members agreement Public consultation to begin 09 May 2023</p> <p>█ (WDC) – Wealden Reg 18 consultation was due in January but has now been postponed and new date yet to be set.</p>	
<p>4. Update on Ashdown Forest Traffic Modelling and discussion (█, WDC)</p>	<p>█ (WDC) reiterated that the brief is to build a model that would be owned by the AFWG but it would need to be held by Jacobs who would then run the model for LPAs.</p> <p>There was some technical discussions around relationship with County models, how to address discrepancies between County models and AF model and how to accommodate different forecasting dates.</p> <p>Jacobs agreed to update brief taking on board comments.</p> <p>Discussions on cost and procurement. Agreed █ (TWBC) and █ (WDC)</p>	<p>Jacobs to update brief. █ (WDC) to circulate</p> <p>█ (TWBC) and █ (WDC) to discuss</p>

## Air Quality Impact at Ashdown Forest - Statement of Common Ground

	<p>would discuss offline and advise group re total cost and any contingencies.</p> <p>Program: The model would hopefully be complete in June 2023 and a first output could be by July/August 2023.</p>	<p>procurement and advise AFWG.</p> <p>MSDC – to monitor progress on model to see if and when they can incorporate into HRA work.</p>
5. Funding for Ashdown Forest Traffic Modelling (DS, TWBC)	As agreed subject to final costs	To Be noted by All
6. Update on air quality monitoring (KSh, WDC)	First year monitoring report likely to be ready in summer. Ksh (WDC) to circulate details of costs and request for Purchase Order	█ (WDC) – circulate request.
7. Date of next meeting	Agreed that most immediate business can be conducted by email but useful to set up a meeting in 6 months time as catch up. If matters arose that needed further discussion a meeting could be called if necessary at any time at the request of any member.	█ (TWBC) to set next meeting
8. Any other business	<p>█ (TWBC) advised group that although a Natural England representative had been identified they did not at present have the capacity to attend the meeting or provide comments. If technical guidance was being sought it would require specialist input and most likely this would be on a cost recovery basis.</p> <p>Members expressed some concern about this response and in particular the lack of advice for the group as a whole and NE's future commitment to a SoCG.</p> <p>Agreed that chair should write to NE expressing concerns and seek confirmation of NEs commitment going forward.</p>	<p>█ (TWBC) to write to NE on behalf of group.</p>

## **Ashdown Forest Working Group – Note of Meeting on 26 October 2022 (Virtual Meeting)**

### **Attendees:**

██████████ – South Downs National Park Authority (SDNPA)  
██████████ – South Downs National Park Authority (SDNPA)  
██████████ – Mid Sussex District Council (MSDC)  
██████████ – Tunbridge Wells Borough Council (TWBC)  
██████████ - Sevenoaks District Council (SDC)  
██████████ – Kent County Council (KCC)  
██████████ – Wealden District Council (WDC)  
██████████ - Lewes and Eastbourne Councils (LDC)  
██████████ – West Sussex County Council (WSCC)  
██████████ - Mid Sussex District Council (MSDC)  
██████████ - Lewes and Eastbourne Councils (LDC)  
██████████ – Tandridge (TDC)  
██████████ - Tandridge (TDC)  
██████████ – Brighton and Hove City Council (B&H)  
██████████ - South Downs National Park Authority (SDNPA)  
██████████ – Tunbridge Wells Borough Council (TWBC)  
██████████ – AECOM  
██████████ AECOM  
██████████ - Jacobs

### **Apologies:**

██████████ – Natural England (NE)  
██████████ – East Sussex County Council (ESCC)  
██████████ – Kent County Council  
██████████ - Sevenoaks District Council (SDC)  
██████████ – Crawley Borough Council (CBC)

### **Invited but not present:**

██████████ – Lewes and Eastbourne Councils (LDC)

## Air Quality Impact at Ashdown Forest - Statement of Common Ground

- ██████████ – Lewes and Eastbourne Councils (LDC)
- ██████████ – Surrey County Council (SCC)
- ██████████ – Mid Sussex District Council (MSDC)
- ██████████ – Tonbridge and Malling Council (T&MC)
- ██████████ - East Sussex CC
- ██████████ – South Downs National Park Authority (SDNPA)
- ██████████ - Brighton and Hove City Council (B&H)

### Notes

Item	Actions
<p>1. Introductions and reasons for the meeting (████ SDNPA)</p> <p>████ introduced the consultants who were invited as guests to assist the discussions:</p> <p>██████████ – AECOM</p> <p>██████████ - AECOM</p> <p>██████████ - Jacobs</p>	
<p>2. Notes of previous meeting (22-02-22)</p> <p>Accuracy OK Notes agreed Noted that ██████████ from NE was leaving. █████ (WDC) agreed to contact NE to ask about a replacement</p>	<p>████ (WDC) to contact NE regarding a replacement</p>
<p>3. Updates on local plans / HRA progress</p> <p>████ for WDC – Preparing for Regulation 18 consultation. Going out to consultation beginning of 2023. Working with AECOM on HRA.</p> <p>████ for Eastbourne and Lewes – Eastbourne about to launch growth strategy next week. Lewes – gathering suite of evidence using AECOM. Consultation deeper into next year, autumn 2023.</p> <p>████ for TWBC – Local Plan examination Stage 2 hearings finished in July. Awaiting Inspector’s letter.</p> <p>████ for SDC - Undertaking Regulation 18 consultation in November for 8 weeks, with Regulation 19 anticipated autumn 2023.</p> <p>████ for SDNPA - Local Plan review at early stage.</p>	

<p>█ for Tandridge – Preparing additional mitigation works for M25 Junction. Adopted interim statement of housing delivery. About to start work on housing allocations paper.</p> <p>█ for MSDC - About to undertake Reg 18 Consultation. Using AECOM for HRA.</p> <p>█ for B&amp;HCC – City plan review still at early stages of evidence gathering. HRA stage towards end of next year.</p> <p>█ for WSCC - Minerals Plan is coming up to five years. Will be undertaking a review in the new year.</p>	
<p>4. Ashdown Forest Traffic Modelling (█, WDC)(document)</p> <p>Summary provided by █ (WDC) and █ (Jacobs) with an overview of the three options.</p> <p>█ (WDC) and █ (Jacobs) provided a short summary of the scenarios, explaining that the most important aspect of HRA is transport modelling, as it provides input of how air quality is understood. The different options were explained.</p> <p>Option 1 – Counties rely upon their own transport modelling in isolation to input into air quality assessment for Ashdown Forest. Doing the work in isolation problems can occur, as inputs and outputs would not be the same. It would not be a strategic approach and is not recommended.</p> <p>Option 2 Is based on the ESCC County wide model so using a single model for Ashdown Forest and so is a cheaper option. Between the three models there are cost saving benefits with just having one model. But not specifically designed for Ashdown Forest and does not cover the whole area needed.</p> <p>An Option 2a is to modify the ESCC model and carry out localised work around Ashdown Forest –but the problem remain that it does not go across county boundaries and may still be criticised.</p> <p>Option 3 is having a bespoke model. This is the recommend option, not built on to existing county wide level, it would include the whole area and would provide the strategic approach. █ (Jacobs) explained that having one modelling tool which is consistent across the area and avoid the confusion of using multiple modelling.</p> <p>█ (AECOM) added that from a HRA point of view, consistency of traffic/air quality forecast is key. There is an efficiency if it is set up with having a single model, at a consistent pace too.</p>	

■ (SDNPA) asked about the zones, referring to Figure 4. ■ (Jacobs) explained they are zones in the model, presenting the amount of movement within and between the zones. The zones are currently in the county wide model. Each green shape in Figure 4 represents the zone.

■ (TWBC) asked about the creation cost to option 3, and whether the same cost would be required at the end of the model's shelf life. ■ (Jacobs) explained that models do have a life span of around 5 years. Over the period of five years, tweaks might be made as runs of the model are carried out but a whole scale update is unlikely to be needed for sometime – possibly 5 to 7 years. When a new forecast is commissioned, some of the data may need to be changed and updated. The updates are likely to cost less than the original cost, but it is impossible to say at this stage what that will be.

■ (MSDC) asked for clarification that the transport modelling is solely for HRA and Ashdown Forest purposes, and other models would be required for looking at highways modelling.

■ (SDNPA) agreed.

It was agreed by all that Option 1 was not preferable.

■ (SDNPA) led a general discussion on the options, and noted that options 2a and 3 were most favourable.

■ (AECOM) stated his preference is Option 3, the Bespoke model, as it would cover all of the authorities rather than just East Sussex. Simpler to create a model targeting specifically what is required. This was agreed widely by other WG members.

■ (WSCC) asked for clarification on option 2a, asking if it is more infilling within existing calibration or if it include extending calibration area into Mid Sussex, as if not included, it takes it close to cost of bespoke model. TC (Jacobs) explained that it would be a hybrid, where more detail would be added to better represent the forest. There is a need to be careful of false economy as the additional work was difficult to predict.

■ (KCC) explained that Kent have now got a county model. They asked what the gaps are in options 2a. ■ (Jacobs) explained the issue would be to do with the purpose of the model. It would not necessarily be the case that missing detail for Ashdown Forest Area would not be needed for this kind of model.

■ (SDNPA) asked about the incomplete representation of forest roads and the implications of these missing for HRA purposes. ■ (AECOM) explained it would vary for different LPAs. For more distant LPAs the major roads were the focus. If this is to be a multi authority model, the other parts of the road network need to be included. A single model will allow for consistency for all of the roads, which is why it is valuable.

<p>█ (MSDC) discussed that there may be different cost implications for different options. The more LPAs that are involved the more reduced costs for everybody. █ (SDNPA) added that with air quality it was divided equally. The same decision will need to be made for this once an option has been agreed.</p> <p>The procurement of the model needs further discussion but this may be through ESCC and/or WDC.</p> <p>█ (TWBC) and others support the approach for a bespoke mode Option 3 as it would be more effective for districts outside East Sussex and less open to challenge. He explained that the decision may have to go through Council Members and so agreement on costs may take a little time. It would be helpful to agree what is going to happen about costs and have a SoCG about the work to make it more consistent.</p> <p>LH suggested voting on which option is preferred.          Option 2 – 0 votes.          Option 2a - 0 votes.          Option 3 – 100% vote for option 3.          Option 3 agreed as the preferred way forward.</p> <p>It was also voted in 100% favour for the cost to be split nine ways as with the air quality monitoring, with Eastbourne and BHCC sharing a joint contribution.</p> <p>█ (WDC) will ask Jacobs to fully scope out work. If there is an in-principle agreement to split the costs, in terms of the amount it could be less or more.</p> <p>█ (WDC) also added that the model may be useful for planning applications in Wealden, as they are unable to rely on a HRA ahead of publishing the PSLP at Reg 19.</p> <p>█ (TWBC) agreed that developers could buy in to the model where bespoke HRAs were required.</p> <p>█ (WDC) to talk to █ (ESCC) about ESCC doing the procurement.</p> <p>█ (MSDC) asked if there are anticipated timescales for the model itself. When it would be commissioned and also ready to use. █ (WDC) would like to use a bespoke model for Reg 19 HRA, ideally procure as soon as possible so that a model is ready for everyone. There is a need to know when all LPAs need this model.</p> <p>Add into the email of when it is required, so Jacobs can know.</p>	<p><b>Action – All to confirm in principle agreement to contribute on an equal share subject to formal quotation.</b></p> <p><b>Action – █ (WDC) to ask for formal quote from Jacobs.</b></p> <p><b>Action - █ (WDC) to talk to ESCC about doing the procurement.</b></p> <p><b>Action – █ (MSDC) to let █ (TWBC) and █ (WDC) know which date MSDC need this model.</b></p>
<p>5. Update on air quality monitoring (█, WDC)</p>	

Air Quality Impact at Ashdown Forest - Statement of Common Ground

<p>██████████ (AECOM) explained that monitoring began in June this year and is due to end May 2025. Problems encountered and actions taken were explained. Monitoring process kept under review and company is liaising with Countryside Rangers.</p> <p>To date, 4 months of raw NO2 data has been received but not yet processed. A report will be collated after a full year of data, in summer/autumn 2023.</p> <p>██████████ (WDC) added that WDC have not yet billed LPAs for the work, as they would like to put together an agreement between them about the joint sharing of data etc. Will make sure the agreement is in place ahead of the financial year. ██████████ (WDC) will aim to progress this before Christmas.</p> <p>A bill before end of the financial year was acceptable and then on a quarterly basis.</p>	<p>██████████ (WDC) to prepare and circulate agreement and raise invoices.</p>
<p>6. Statement of Common Ground (██████████, SDNPA)</p> <p>██████████ (SDNPA) explained this was originally drawn up in 2018. The intention is for the monitoring work and transport modelling to form two appendices for a fairly concise SoCG. Once the transport modelling has been agreed, the SoCG can be progressed.</p> <p>██████████ (WDC) explained that she had previously started drafting a SoCG but now seems an appropriate time and would assist those LPAs who are preparing Local Plans. ██████████ (WDC) will aim to progress as soon as she can.</p> <p>Others were supportive of a new SoCG.</p>	<p>██████████ (WDC) to circulate draft SoCG</p>
<p>7. Chair of the AFWG (██████████, SDNPA)</p> <p>██████████ (SDNPA) is leaving the WG on 25 November to become Planning Policy Manager at Portsmouth City Council. ██████████ shared some of her reflections as Chair.</p> <p>A 100% vote in favour of ██████████ (TWBC) chairing the group. ██████████ (TWBC) and the WG thanked Lucy for bringing the group together, handling some difficult times and for all her hard work over the years. ██████████ also thanked ██████████ (SDNPA) and ██████████ (WDC) for their hard work, cooperation and continued support for the work of the group.</p> <p>██████████ (TWBC) suggested setting up a meeting once ██████████ (WDC) has spoken to Jacobs and further information was available. ██████████ (TWBC) would do doodle poll for a meeting most likely in the new year.</p>	<p>██████████ (TWBC) to set date for meeting in the new year.</p>
<p>8. Any other business</p> <p>None</p>	

**Ashdown Forest SAC**  
**2 pm Thursday 20 February 2020**  
**Mid Sussex District Council Offices, Haywards Heath**

**MEETING NOTES**

**Attendees:**

██████████ – South Downs National Park Authority (SDNPA)

██████████ – South Downs National Park Authority (SDNPA)

██████████ – Mid Sussex District Council (MSDC)

██████████ – Wealden District Council (WDC)

██████████ – Wealden District Council (WDC)

██████████ – Wealden District Council (WDC)

██████████ – Lewes and Eastbourne Councils (LDC)

██████████ - Lewes and Eastbourne Councils (LDC)

██████████ – West Sussex County Council (WSCC)

██████████ – East Sussex County Council (ESCC)

██████████ – Tunbridge Wells Borough Council (TWBC)

██████████ – Tandridge District Council (TDC)

██████████ – Rother District Council (RDC)

██████████ – Crawley Borough Council (CBC)

██████████ – Natural England (NE)

██████████ – Natural England (NE)

**Apologies:**

- William Bryans, Surrey County Council
- Helen French, Sevenoaks District Council

<b>Agenda Item</b>	<b>Actions</b>
I. Introductions and reasons for meeting: <ul style="list-style-type: none"><li>• Introductions were made and apologies given.</li><li>• ██████████ (SDNPA) introduced the meeting and said today is all about the future of the group and what we want/need to do. The Ashdown Forest Working Group (AFWG) was formed after the Wealden challenge and the quashing of the Lewes Joint Core Strategy. The purposes of the group are to address the issue of air quality in Ashdown Forest, share best practice and work cooperatively on this strategic cross boundary issue. We now have the Inspectors' reports on the South Downs Local Plan and the Wealden Local Plan and</li></ul>	None

Air Quality Impact at Ashdown Forest - Statement of Common Ground

<p>we have the Statement of Common Ground. Several other local plans and their HRA's are progressing. So, what is the future of the group? Is air quality in Ashdown Forest still a cross boundary strategic issue and what do we want/need to do about it? Here is what Inspector ██████ said about it in her report:</p> <p>'13. The AFWG is an important vehicle to share evidence and to enable the individual competent authorities to undertake effective plan making on a strategic and cross boundary basis with particular reference to the Ashdown Forest SAC. It provides, in theory, the opportunity for each local planning authority to work cooperatively with each other, on an ongoing basis and in a constructive manner to maximise the effectiveness of plan preparation. The AFWG membership also includes Natural England, who, as the Government's adviser, has a significant role in advising and being consulted upon the individual local authorities' HRAs and who, had, since the 'Wealden judgement', revised, and subsequently published, its internal advice re air quality matters.'</p> <p>By the end of the meeting, we need to agree on our future and our purpose.</p>	
<p>2. Notes of previous meeting (29-11-18)</p> <ul style="list-style-type: none"> <li>• A number of amendments to meeting notes requested and agreed: <ul style="list-style-type: none"> <li>○ Item 6: Correction – regarding NE air in house air quality specialist – should state 'NE currently do not have an in house national air quality specialist' at the time of the meeting.</li> <li>○ Item 6: Correction - reference to 'SCALE' be replaced with 'SCAIL'</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• ██████ (SDNPA) to update notes with changes</li> </ul>
<p>3. Update from Wealden District Council</p> <ul style="list-style-type: none"> <li>• Wealden District Council accept the Local Plan Inspector's findings and are not intending to challenge them. On 19<sup>th</sup> February, the Council voted to withdraw the plan and actions are now underway to do that. WDC will be starting from the beginning on their new plan. Some aspects will be carried forward – certain policies etc. – but as regards HRA/Ashdown Forest and related matters, it will be a fresh start. WDC would like to move forward on this issue collectively.</li> </ul>	<p>None</p>
<p>4. Updates on Local Plans and HRAs (All to share stage and principle findings)</p> <ul style="list-style-type: none"> <li>• Local Plan updates: <ul style="list-style-type: none"> <li>○ SDNPA – LP adopted 02-07-19</li> </ul> </li> </ul>	<p>None</p>

<ul style="list-style-type: none"> <li>○ ESCC – Review of Waste &amp; Minerals Plan underway and is limited in scope. The Reg. 18 screened out AA on that basis.</li> <li>○ LDC – Adoption of LPP2 on 24<sup>th</sup> February. Then onto Core Strategy review.</li> <li>○ EBC – Regulation 18 screening did not screen air quality and Ashdown Forest. Regulation 19 later this year.</li> <li>○ WSCC – Soft Sand Single Issue Review consultation underway and examination expected this summer.</li> <li>○ CBC – Regulation 19 Local Plan Review consultation underway. Transport Assessment work also underway and will be completed for submission.</li> <li>○ WDC – Starting work on a new plan. Early stages and no details on time frames yet.</li> <li>○ RDC – Part 2 Local Plan adopted in December 2019. Local Plan Review in early stages.</li> <li>○ TDC – Examination hearing for the Plan were at the end of 2019. Ashdown Forest Air Quality was discussed in detail and not a significant issue at the hearings.</li> <li>○ MSDC – Currently working towards Regulation 19 consultation on the site allocation plan. HRA work currently being undertaken.</li> <li>○ TWBC – Regulation 19 planned for this autumn. Will remodel to incorporate any changes, Interim note still being used with regard to planning applications.</li> </ul>	
<p>4. Lewes Downs SAC (should this be removed as a standing item?)</p> <ul style="list-style-type: none"> <li>● All agreed that this should be removed as a standing item from the agenda for meetings going forward.</li> </ul>	<ul style="list-style-type: none"> <li>● ■ (SDNPA) to remove as a standing item on the agenda.</li> </ul>
<p>5. Future Air Quality Monitoring (is it needed?)</p> <ul style="list-style-type: none"> <li>● Outlined and agreed three main possible options for future air quality monitoring: <ul style="list-style-type: none"> <li>1-As is now</li> <li>2-Scaled back on site – possibly using a handful of key strategic monitoring locations over a number of possible time frames such as either annual or for 6 months every 2 or 3 years,</li> <li>3-Using data from APIS website</li> </ul> </li> <li>● ■ (WDC) briefly listed some pros, cons and factors to consider of the various options to consider such as cost, accuracy, need for joint working etc.</li> <li>● Question was asked to NE as to what their expectation are regarding monitoring. NE responded that ongoing monitoring may not be considered necessary as long as the excellent baseline acquired was used and up to date COPERT (the assumptions that are used for forecast are updated and revalidated regularly – taking into account the uptake of</li> </ul>	<ul style="list-style-type: none"> <li>● ■ (TWBC) to draft Open Letter to AECOM asking for advice on monitoring ways forward. Timeframe to allow for a response from AECOM in time for our next meeting and allowing time for the group to comment on a</li> </ul>

<p>electric vehicle use etc.) modelling is used in future plan making. Using the latest COPERT is using the best available scientific evidence.</p> <ul style="list-style-type: none"> <li>• WDC updated their position – the contract for the current monitoring ends at the end of March, however, notice needs to be given today (day of this meeting) whether we wish to continue. If we do wish to continue and we give notice today there will be a slight gap in any monitoring. All noted this and agreed there wasn't any concern about a gap. Spoke with consultants running the current contract about future modelling and one suggestion was putting monitoring tubes out for 6 months every two years.</li> <li>• It was suggested that we could ask NE for their view via DAS or to consultants such as AECOM. All agreed to ask AECOM for set out questions clearly – along the lines of 'Taking into account existing information including the strong baseline data, current practice and what if any further modelling is required to inform plans/HRA, what, if any, monitoring would be appropriate. ■■■ (TWBC) agreed to draft open letter to AECOM. ■■■ (TWBC) to run draft by the group for comment.</li> </ul>	<p>draft of the Open Letter.</p>
<p>6. Statement of Common Ground (SoCG) and possible review</p> <ul style="list-style-type: none"> <li>• ■■■ (SDNPA) opened up the discussion regarding the SoCG and possible review, noting the recent updated position from WDC that they would like to sign the existing SoCG.</li> <li>• All agreed that there was merit in an update of the SoCG in light of the changed position of WDC and the future approach to monitoring etc. and also an opportunity to simplify.</li> <li>• Confirmed that NE guidance is in accordance with the AECOM approach.</li> <li>• WDC volunteered to draft new SoCG.</li> </ul>	<ul style="list-style-type: none"> <li>• WDC to prepare a draft of the SoCG to circulate for comment ahead of the next meeting.</li> </ul>
<p>7. Strategic Nitrogen Action Plan</p> <ul style="list-style-type: none"> <li>• ■■■ (NE) outlined the work being undertaken by NE so far which contributes to a SNAP             <ul style="list-style-type: none"> <li>○ Actions mainly around catchment sensitive farming. Farmers are given water and air quality advice regarding N. These are voluntary measures but they do have benefits for farm economics. NE will be monitoring this.</li> <li>○ Query regarding the new ELMS – NE said this is still emerging and it is not yet know how ELMS will work. Noted that Pevensey is a pilot area for ELMS.</li> <li>○ Reiterated that SNAP is not mitigation but it can help to bring the background levels down which would be expected to be picked up by APIS in due course.</li> </ul> </li> </ul>	<p>None</p>

Air Quality Impact at Ashdown Forest - Statement of Common Ground

<ul style="list-style-type: none"> <li>○ SNAP is an independent document/project. The work NE are doing on agricultural emissions is one part of the SNAP but anything else that the AFWG do can also be part of the SNAP.</li> </ul>	
<p>8. Agreement on the future and the purposes of the group moving forward</p> <ul style="list-style-type: none"> <li>• ■■■ (SDNPA) opened up the discussion regarding future of the group.</li> <li>• All agreed that the group should continue to exist in light of the comments from Louise Nurser (Wealden Local Plan Inspector) and as members find it a useful forum.</li> <li>• It was discussed whether we should meet or operate by correspondence. All agreed that there are benefits to meeting that it would be good to have meetings in the diary but these can be cancelled if there is nothing in particular to discuss.</li> <li>• It was agreed that it would be useful to share updates on hosing numbers, issues cropping up in modelling and latest evidence.</li> <li>• All agreed to keep the purposes as outlined by ■■■ (SDNPA) at the start of the meeting.</li> <li>• All agree that Ashdown Forest SAC and air quality is still a strategic cross boundary issue.</li> <li>• The timing of the SoCG would trigger the need for meetings in the short to medium term.</li> <li>• Agreed that next meeting would be May/early June where we will discuss:             <ul style="list-style-type: none"> <li>1-The response from AECOM regarding monitoring</li> <li>2-The first draft of the SoCG prepared by WDC.</li> </ul> </li> <li>• CBC and WDC agree that a separate letter can be prepared regarding WDC new position if the CBC plan submission is ahead of the new SoCG.</li> </ul>	<ul style="list-style-type: none"> <li>• ■■■ (SDNPA) to book next meeting for May/June in liaison with JH (MSDC) for venue</li> <li>• Actions for WDC and ■■■ (TWBC) regarding the SoCG and Open Letter to AECOM ahead of the next meeting as noted in earlier agenda item actions.</li> <li>• CBC and WDC to liaise regarding CBC plan submission.</li> </ul>
<p>9. AOB</p> <ul style="list-style-type: none"> <li>• None</li> </ul>	

**Ashdown Forest SAC Working Group Meeting**

**10:00 am Thursday 29<sup>th</sup> November 2018**

**Mid Sussex District Council Offices, Haywards Heath**

**Attendees:**

██████████ – South Downs National Park Authority (SDNPA)

██████████ – South Downs National Park Authority (SDNPA)

██████████ – Mid Sussex District Council (MSDC)

██████████ – Wealden District Council (WDC)

██████████ – Wealden District Council (WDC)

██████████ – Wealden District Council (WDC)

██████████ – Lewes and Eastbourne Councils (LDC)

██████████ – Tunbridge Wells Borough Council (TWBC)

██████████ – East Sussex County Council (ESCC)

██████████ – Tandridge District Council (TDC)

██████████ – Sevenoaks District Council (SDC)

██████████ – West Sussex County Council (WSCC)

██████████ – Rother District Council (RDC)

██████████ – Crawley District Council (CDC)

██████████ – Brighton & Hove City Council (BHCC)

For Agenda Item 9: ██████████ – Ashdown Forest Forum

**Apologies:** ██████████ – Sevenoaks District Council, ██████████ – Natural England

<b>Agenda Item</b>	<b>Actions</b>
1. Introductions and reasons for meeting: <ul style="list-style-type: none"><li>• ██████ (SDNPA) introduced the meeting and said it was about air quality impacts on the AF SAC.</li><li>• Introductions were made and apologies given.</li></ul>	
2. Notes of previous meeting (04-06-18) <ul style="list-style-type: none"><li>• The notes of the meeting held on the 4<sup>th</sup> June 2018 were agreed.</li><li>• All actions were completed or will be discussed during the meeting.</li><li>• ██████ (SDNPA) noted that the Ashdown Forest Forum did not respond with any comments following receipt of the</li></ul>	

‘Summary of potential solutions to address background air quality’ table.	
<p>3. Updates on Local Plans and HRAs (All to share stage and principle findings)</p> <ul style="list-style-type: none"> <li>• Local Plan updates: <ul style="list-style-type: none"> <li>○ SDNPA – Examination in progress. The HRA was discussed, but air quality and Ashdown Forest was not. Same item to be discussed on Tuesday 4<sup>th</sup> December hearing.</li> <li>○ WDC – Submission January 2019. Reg 19 consultation responses are on-line. A number of responses have been received in relation to HRA matters.</li> <li>○ B&amp;HCC – City Plan Part 2 Reg 18 consultation next summer. Updated HRA work by AECOM.</li> <li>○ CBC – Local Plan review over the next year. HRA work by AECOM and NE no objection.</li> <li>○ RDC – Reg 19 Development and Site Allocations (DaSA) Local Plan in progress. Submission of DaSA in January 2019. HRA work by AECOM.</li> <li>○ WSCC – Minerals LP adopted. Work on a soft sand review will progress.</li> <li>○ MSDC – District Plan adopted. Progressing Site Allocations DPD and commissioned separate consultants for transport, air quality and HRA work.</li> <li>○ TDC – Submission January 2019. AECOM did air quality part of HRA.</li> <li>○ TWBC – Reg 18 consultation next summer. Updated HRA work.</li> <li>○ ESCC – Partial review of Waste &amp; Minerals LP. HRA work being undertaken.</li> <li>○ LDC – Submit Part 2 LP January 2019.</li> <li>○ EBC – New LP Reg 18 consultation next autumn. HRA work by AECOM.</li> <li>○ SDC – Regulation 19 published now. Submission after 24/1. AECOM HRA concluding no adverse effect on Ashdown Forest.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• ■■■ (SDNPA) to circulate a short note following the relevant SDNPA Examination Hearing to outline any key HRA or Ashdown Forest issues that were discussed.</li> </ul>
<p>4. Updates on housing figures for Appendix 4 of Ashdown Forest Statement of Common Ground</p> <ul style="list-style-type: none"> <li>• A discussion was held on the layout of the table with some suggested comments on amended column headings.</li> </ul>	<ul style="list-style-type: none"> <li>• ■■■ (SDNPA) to circulate a new table with updated column headings.</li> <li>• ALL to update and complete, and send back to SDNPA.</li> </ul>
<p>5. Update from Natural England</p> <ul style="list-style-type: none"> <li>• Not discussed as Natural England not present.</li> </ul>	

<p>6. Feedback on objections to the Pre-Submission Wealden Local Plan</p> <ul style="list-style-type: none"> <li>• [REDACTED] (WDC) summarised the responses received to Policies AF1 and AF2. <ul style="list-style-type: none"> <li>○ For Policy AF1 comments included that the HRA does not consider the precautionary principle, the effectiveness of mitigation, the type of development being considered, housing numbers suggested should be higher, and there was also some support for the approach taken.</li> <li>○ For Policy AF2, similar comments were received.</li> </ul> </li> <li>• Comments, including objections, received with regard to duty to co-operate.</li> <li>• WDC will now finalise the HRA following consideration of Natural England’s advice.</li> <li>• WDC is seeking advice from air quality and ecology consultants as well as legal advice from Counsel.</li> <li>• There was a general discussion on the recent CJEU judgment (Kokott) in relation to farming in the Netherlands and nitrogen deposition and whether it is likely to have any implications for HRA work currently being undertaken. There were differing views emerging from the group. All agreed that the group would ask Natural England for its views and to clarify the process on how it would update local authorities on case law.</li> </ul>	<ul style="list-style-type: none"> <li>• [REDACTED] (WDC) to circulate a link to the recent EU guidance on HRA.</li> <li>• [REDACTED] (WDC) to send links to recent case law.</li> <li>• [REDACTED] (WDC) to send a link to recent papers published by its air quality consultants (not in relation to Ashdown Forest)</li> <li>• [REDACTED] (LDC) to ask Natural England about the process for updating local authorities on case law.</li> </ul>
<p>7. Issues arising from draft policies AF1 and AF2 of Pre-Submission Wealden Local Plan</p> <ul style="list-style-type: none"> <li>• All agreed it would be beneficial for WDC to update the group on its latest work such as evidence and legal advice following submission of its LP.</li> </ul>	<ul style="list-style-type: none"> <li>• [REDACTED] (SDNPA) to add to the agenda for next meeting of the group</li> </ul>
<p>8. Future work streams and working arrangements for the Ashdown Forest Working Group</p> <p>(a) Future iterations of the SoCG</p> <ul style="list-style-type: none"> <li>• Agreed that due to the unique nature of the issue the SoCG would need to remain bespoke, but the group would see what the new template from PAS may suggest. Renewal of SoCG to be standing item on the agenda and will be discussed at the next meeting.</li> </ul> <p>(b) Lewes Downs and Pevensey Levels</p> <ul style="list-style-type: none"> <li>• A separate group to be established to discuss matters relating to the Pevensey Levels.</li> <li>• This new group will keep the Ashdown Forest Working Group informed of any relevant matters.</li> <li>• Lewes Downs to be discussed as part of the Ashdown Forest Working Group.</li> </ul> <p>(c) Exploration of a Strategic Nitrogen Action Plan (SNAP)</p>	<ul style="list-style-type: none"> <li>• LDC, RDC, WDC to have separate meeting with regard to Pevensey Levels.</li> <li>• [REDACTED] (SDNPA) to add Lewes Downs as the last item of the agenda for these meetings going forward</li> <li>• Monitoring to be made a standing item for these meetings going forward.</li> </ul>

## Air Quality Impact at Ashdown Forest - Statement of Common Ground

<ul style="list-style-type: none"> <li>• Not discussed as Natural England not present.</li> </ul> <p>(d) Scoping and responsibilities for future monitoring and studies in relation to air quality</p> <ul style="list-style-type: none"> <li>• All our work on air quality needs to be informed by on-site monitoring.</li> <li>• Likely to be discussed at WDC LP EiP</li> <li>• EBC and CBC to start monitoring for their new local plans</li> <li>• Standing item for this group's meetings</li> </ul>	
<p>9. Ashdown Forest Stakeholder Forum (Judith Ashton, Ashdown Forest Forum)</p> <ul style="list-style-type: none"> <li>• JA outlined the points raised in the Ashdown Forest Forum's response to the WDC LP publication. This includes querying the evidence base, querying the HRA, mitigation (if necessary) should be considered in partnership with the other local authorities, viability of mitigation, and cost assumptions of mitigation.</li> <li>• The Forum will wait to see how WDC responds on matters before deciding what to do next.</li> <li>• The Forum has sought technical and legal advice.</li> <li>• WDC and SDNPA provided JA (Ashdown Forest Forum) with an update on LP matters.</li> </ul>	<ul style="list-style-type: none"> <li>• ■ (SDNPA) to circulate a link to the representation to the WDC LP publication received from the Ashdown Forest Forum.</li> </ul>
<p>10. Any other business</p> <ul style="list-style-type: none"> <li>• WDC is working with ESCC on a HIF bid for strategic transport, education and Ashdown Forest mitigation funding. This could include capital funding for a website, electric vehicle infrastructure and monitoring equipment. The HIF bid will be submitted by the 1<sup>st</sup> March 2019.</li> </ul>	<ul style="list-style-type: none"> <li>• WDC to send the group the bid on submission and details of the projects</li> <li>• ■ to send a Doodle Poll for a meeting in February</li> </ul>