Ashdown Forest
Statement of Common Ground

Prepared by The South Downs National Park Authority, Chair of the Ashdown Forest Working Group

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1. Introduction

The basis for preparing this Statement of Common Ground

1.1 This Statement of Common Ground (SCG) has been prepared by the South Downs National Park Authority (SDNPA) and is signed by the following members of the Ashdown Forest Working Group (AFWG):[1] the SDNPA, Lewes District Council, Eastbourne Borough Council, Tunbridge Wells Borough Council, Mid Sussex District Council, Tandridge District Council, Crawley Borough Council, Sevenoaks District Council, Rother District Council, East Sussex County Council (as the relevant Minerals and Waste Planning Authority), West Sussex County Council and Natural England. It should be noted that Wealden District Council (WDC) is a member of the AFWG and were involved in the drafting of this document; WDC did not sign the SCG. The signatories of this SCG have been self-selected and come from the AFWG. Further details of this group are set out below. The preparation of the SCG has been facilitated by the Planning Advisory Service (PAS).

1.2 The purpose of this SCG is to address the strategic cross boundary issue of air quality impacts on the Ashdown Forest Special Area of Conservation (SAC) arising from traffic associated with new development. It provides evidence on how the authorities have approached the Duty to Co-operate, clearly setting out the matters of agreement and disagreement between members of the AFWG.

1.3 The first section of the SCG introduces the document and explains the background to this cross boundary strategic issue. The second section sets out six key matters on HRA methodology for plan-making with which authorities either agree or disagree with or have no position on. Finally, actions going forward and summary conclusions are given.

1.4 The SCG highlights a number of different approaches towards undertaking HRA work. It identifies that participating local planning authorities (LPAs) consider they have taken a robust and proportionate approach to the evidence base in plan making, producing in combination assessments which they consider to have been undertaken soundly. Natural England notes that some of the approaches differ and consider that it is up to individual LPAs to determine the specific approach they use. Natural England advise that approaches proportionate to the risk are acceptable and it is not necessary for all LPAs to use exactly the same approach.

1.5 The different LPAs have used different consultants to undertake their Habitats Regulations Assessments (HRAs). AECOM are the HRA consultants for the SDNPA, Lewes District Council, Tunbridge Wells Borough Council, Tandridge District Council, East Sussex County Council and Sevenoaks District Council. Urban Edge Environmental Consulting, Amey and Arup are the HRA consultants for Mid-Sussex District Council. Crawley Borough Council, Eastbourne Borough Council and Rother District Council have not currently engaged HRA consultants as they have up to date adopted Local Plans.

1.6 Ashdown Forest is also designated as a Special Protection Area (SPA). It should be noted that this Statement 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.

[1] Tonbridge and Malling Borough Council are members of the Working Group but are not a signatory of this Statement on the basis of advice from Natural England. T&MBC continue to be part of the group to observe.

This is addressed through the working group of affected authorities that have assisted in the production of the Strategic Access Management and Monitoring Strategy.

Background to the issue

Ashdown Forest SAC

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

Habitats Regulations Assessment

1.7 The Conservation of Habitats and Species Regulations 2017 (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.

High Court Judgement

1.8 In March 2017 a legal challenge from Wealden District Council (WDC) was upheld by the High Court on the Lewes District and South Downs National Park Authority Joint Core Strategy (Lewes JCS)[2] on the grounds that the HRA was flawed because the assessment of air quality impact on the Ashdown Forest SAC was not undertaken 'in combination' with the increase in vehicle flows likely to arise from the adopted Wealden Core Strategy. This resulted in the quashing of Policies SP1 and SP2 of the Lewes JCS, insofar as they apply to the administrative area of the South Downs National Park, at the High Court on 20 March 2017.

Wealden DC Responses to other LPAs Plan Making and Decision Taking

1.9 It should be noted that the representation from WDC on the Pre-Submission version of the South Downs Local Plan and to the draft Lewes Local Plan Part 2 objects to their HRAs. Objections have also been made by WDC to the Main Modifications consultation on the Mid Sussex Local Plan. The South Downs National Park Authority, Lewes District Council and Mid Sussex District Council do not accept the objections made by Wealden District Council on the HRA work undertaken for their Local Plans and consider that the assessments undertaken are robust, reasonable and sound.

1.10 Since work started on this Statement of Common Ground, WDC have objected to planning applications in Tunbridge Wells Borough, Rother District, Lewes District, Mid Sussex District, Tandridge District, Horsham District, Sevenoaks District, Hastings Borough and Brighton & Hove City. The objections all centre on the issue of nitrogen deposition on Ashdown Forest.

[2] Wealden District Council vs Secretary of State for Communities and Local Government, Lewes District Council and South Downs National Park Authority, and Natural England. [2017] EWHC 351 (Admin) http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html

This Statement of Common Ground is about plan-making rather than the determination of planning applications and so does not address these letters of objection.

Ashdown Forest Working Group

1.11 Following the High Court judgement, the SDNPA led on convening and now chairs the AFWG, which first met in May 2017. The group's members are listed in paragraph 1.1 of this SCG. This HRA matter has arisen for these authorities through their Local Plan work, through WDC objections to planning applications, or due to proximity to strategic roads traversing Ashdown Forest. As set out in legislation, Natural England is a statutory consultee on HRA and is providing advice on the outputs from the air quality modelling. The county councils, as well as the independent consultants mentioned in paragraph 1.5 provide advice in regard to transport evidence that has and is being undertaken to inform Local Plans.

1.12 The shared objective of the working group is to ensure that the impacts of development proposals in emerging local plans on Ashdown Forest are properly assessed through HRA and that, if required, a joint action plan is put in place should such a need arise. 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 the 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 182 of the National Planning Policy Framework (NPPF) states that for a local plan to be considered sound it needs to be justified and based on proportionate evidence. The draft CLG guidance[3] makes it clear that when implementing HRA of land-use plans, the appropriate assessment should be undertaken at a level of detail that is appropriate and proportional:

'The comprehensiveness of the assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources than is useful for its purpose.'

2.2 The AFWG has discussed the issue of proportionality and the following principles were put forward:

- 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[4] can, if carried out robustly, provide the necessary evidence to inform HRA on the potential effects of a development plan on the Natura 2000 network and Ramsar sites.

[3] CLG (2006) Planning for the Protection of European Sites, Consultation Paper

[4] 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.

- 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.

Table 1: Signatory position regarding proportionality of assessments

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority			
Tunbridge Wells Borough Council			
Sevenoaks District Council			
Lewes District Council			
Eastbourne Borough Council			
East Sussex County Council			
Natural England			
Crawley Borough Council			
Tandridge District Council			
West Sussex County Council			
Mid Sussex District Council			
Rother District Council			

2.3 The named authorities agree with this approach for the following reasons. 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)5 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 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 Local Planning Authority (LPA) area is an important matter as it is a key input into any traffic model. The AFWG has discussed this matter and the following approach is proposed as a general principle for the purpose of making forecasting assumptions relating to neighbouring planning authorities for in combination assessment of plan going forward:

[5] 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.

- Where a Local Plan is less than 5 years old, the adopted Local Plan figures should be used, unless the LPA advise in writing that, due to a change in circumstance, an alternative figure should be used or
- Where an emerging Local Plan is at or beyond the pre-submission consultation stage and the LPA undertaking the modelling can be confident of the figures proposed, then the emerging Local Plan figure should be used, or
- For Local Plans that are over 5 years old and considered out of date, and the emerging Local Plan has not progressed, then the OAN/Government Standard Methodology (once confirmed by CLG) should be used, unless otherwise evidenced.

Table 2: Signatory position on statements above on the approach to identifying appropriate local plan housing numbers to include in modelling for the purposes of forecasting assumptions for HRA air quality modelling.

Agree	Disagree	No position	Reserve judgement
South Downs National Park Authority		Natural England	
Lewes District Council		Tandridge District Council	
Tunbridge Wells Borough Council		East Sussex County Council	
Sevenoaks District Council		West Sussex County Council	
Eastbourne Borough Council			
Crawley Borough Council			
Mid Sussex District Council			
Rother District Council			

2.5 The named authorities agree with this approach for the following reasons: The approach outlined above provides a reasonable and practical way forward to ensure that housing numbers used in future modelling work are selected in a consistent and transparent way and are most robust to inform HRA work.

2.6 These named authorities have no position in regards to this approach for the following reasons:

- Tandridge District Council: will apply this approach for consistency and the Duty to Cooperate.
- West Sussex County Council: WSCC is not an LPA for housing.
- East Sussex County Council: ESCC is not an LPA for housing.

2.7 Based on the above principle set out in paragraph 2.5, Appendix 4 of the Statement sets out agreed housing numbers at the time of drafting this Statement (December 2017). It is recognised that housing numbers would change often due to the number of authorities that

are signatories to this Statement, and therefore these numbers represent a snapshot in time. In light of this, a further three principles are put forward:

- It is expected that each LPA will confirm housing numbers with individual authorities before running models;
- Housing numbers will be a standing item on the agenda for the Working Group going forward. AFWG members shall notify the working group immediately if events take place (relevant to paragraph 2.5) which require an amendment to Appendix 4. In the absence of any objection within 14 days of notification, Working Group members may use the amended figures pending formal sign-off of the changes to Appendix 4 at the next Working Group meeting.
- The agreement of specific housing numbers as set out in Appendix 4, as updated from time to time is applicable to future modelling runs and does not involve retrospectively re-running models. The focus of future modelling is agreed to be to assess the (in combination) impacts of forthcoming Local Plans, not to retrospectively reassess existing adopted Local Plans.

Table 3: Signatory position on the statements above regarding housing numbers and air quality modelling.

Agree	Disagree	No position	Reserve judgement
South Downs National Park Authority		Natural England	
Lewes District Council		East Sussex County Council	
Sevenoaks District Council		West Sussex County Council	
Tandridge District Council			
Eastbourne Borough Council			
Crawley Borough Council			
Tunbridge Wells Borough Council			
Mid Sussex District Council			
Rother District Council			

2.8 The named authorities agree with this approach for the following reasons. The approach outlined above provides a reasonable and practical way forward for LPAs to work together in sharing the latest information on housing numbers to inform future modelling work.

2.9 These named authorities have no position in regards to 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.

Traffic Modelling

2.10 The key elements of the various traffic modelling approaches are set out in Appendix 5 of this Statement. Appendix 5 includes analysis of the major differences[6], minor differences and commonalities in traffic modelling undertaken. The AFWG has discussed these approaches for the purpose of future in combination assessments and agree/disagree with the following:

Geographical Coverage

2.11 This SCG does not set out specific geographical coverage for traffic modelling work. It is 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.

Table 4: Signatory position on geographical coverage of their traffic modelling

Agree	Disagree	No position	Reserve judgement
South Downs National Park Authority			
Lewes District Council			
Tunbridge Wells Borough Council			
Tandridge District Council			
Mid Sussex District Council			
Sevenoaks District Council			
Eastbourne Borough Council			
Rother District Council			

2.12 The named authorities agree with this approach for the following reasons. The nature of the issue is such that it is not appropriate for a set geographical boundary to be drawn. The above approach outlines a practical, proportionate and robust way forward in combination with the other parameters agreed in the subsections below.

Road Network in Ashdown Forest

2.13 The following roads through or adjacent to Ashdown Forest are modelled: 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 logical and reasonable to begin by modelling the roads where

[6] The words 'major' and 'minor are given their common usage, and are not be restricted to the definition of major development in the Town and County Planning (Development Management Procedure) (England) Order 2015, or to proposals that raise issues of national significance

the impact will be highest and if, when modelling A roads, a conclusions of no likely significant effects is identified then it is not considered necessary to go on to model B and minor roads.

Table 5: Signatory position on which roads through or adjacent to Ashdown Forest are modelled

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		East Sussex County Council	Mid Sussex District Council
Lewes District Council		Natural England	
Tunbridge Wells Borough Council			
Tandridge District Council			
Eastbourne Borough Council			
Crawley Borough Council			
Sevenoaks District Council			
West Sussex County Council			

2.14 These named authorities agree with this statement for the following reasons: The above approach sets out a reasonable and logical approach for determining likely significant effects in such a way that is robust and also proportionate. Beginning by modelling the more strategic busiest routes, where impacts will be highest, is an appropriate way to identify likely significant effects. These routes have the greatest current and future flows and are also routes likely to experience greatest change in growth, especially those most likely to be used by residents of authorities some distance from the SAC.

2.15 Mid Sussex District Council reserves judgement in regards the approach set out above for the following reasons: Mid Sussex agrees with this practical approach, but has found that in its case it has been appropriate to consider traffic changes on forest roads, which link to mid Sussex District, including the B1110.

Data types for base year validation

2.16 The data type for the modelling base year is the 24hr Annual Average Daily Traffic (AADT) and uses base flow data provided by WDC for 2014.

Table 6: Signatory position on the data types for base year validation

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		East Sussex County Council	Mid Sussex District Council
Lewes District Council		Rother District Council	
Tunbridge Wells Borough Council			
Tandridge District Council			

Eastbourne Borough Council			
Crawley Borough Council			
Natural England			
Sevenoaks District Council			
West Sussex County Council			

2.17 Rother District Council has no position in regards to the approach set out above for the following reasons: While Rother District Council agrees with the use of AADT as a basis for assessing traffic flows, it has not undertaken recent traffic modelling outside of Bexhill area, so has not considered the use of base flow data. Rather, it draws on the most recent traffic survey results from East Sussex County Council.

2.18 Mid Sussex District Council reserves judgement in regards the approach set out above for the following reasons: Mid Sussex believes that this should be the most recent robust and validated data source and this may refer to more recent years.

Trip Generation Methodology

2.19 Use of TRICS[7] rates. TRICS is the national standard system of trip generation and analysis in the UK, and is used as an integral and essential part of the Transport Assessment process. The system allows its users to establish potential levels of trip generation for a wide range of development and location scenarios.

Table 7: Signatory position on trip generation methodology

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		Natural England	
Lewes District Council			
Tunbridge Wells Borough Council			
Tandridge District Council			
Eastbourne Borough Council			
East Sussex County Council			
Crawley Borough Council			
Sevenoaks District Council			
West Sussex County Council			
Mid Sussex District Council			
Rother District Council			

[7] http://www.trics.org/

2.20 These named authorities agree with this approach for the following reasons. The approach outlined above is supported on the basis that TRICS is the most robust available system for LPAs to use in their respective modelling exercises.

Demand changes assessed in study

2.21 The demand changes assessed are housing and employment. Employment figures are either provided directly by the local authority or TEMPRO includes allowances for growth in jobs. Housing numbers are identified using the methodology set out in paragraphs 2.5 and 2.8 of this SCG. These are per annum based on Local Plans, or alternatively Objectively Assessed Need (as agreed in this Statement) to be used in the National Trip End Model Program (TEMPRO).The growth rate is adjusted according to each scenario as appropriate.

Table 8: Signatory position on the demand changes assessed in study

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		Natural England	
Lewes District Council			
Tunbridge Wells Borough Council			
Eastbourne Borough Council			
Sevenoaks District Council			
Tandridge District Council			
West Sussex County Council			
Crawley Borough Council			
Mid Sussex District Council			
Rother District Council			
East Sussex County Council			

2.22 The named authorities agree with this approach for the following reasons. TEMPRO is an industry standard database tool across Great Britain, provided by the Department for Transport and therefore forecasting using TEMPRO has a high degree of consistency. TEMPRO can be adjusted with emerging plan figures (as agreed in this Statement) to reflect the latest updates in expected growth.

Forecasting Growth

2.23 There are two key elements to the forecasting of growth arising from Local Plans:

- In combination assessment of the proposed Local Plan with other plans. For this the 'Do Something' (i.e. the proposed Local Plan) compared with the Base (i.e. all expected traffic growth over the assessment period).
- The relative contribution of the Local Plan in question to that in combination change. This is difference between Do Something (i.e. with Local Plan) and Do Nothing (without the

Local Plan). To forecast the 'Do nothing' background growth, which is the likely growth of traffic to arise without the proposals set out in the development plan being assessed, the current issued version of TEMPRO available at the date of commencing transport study work is used. TEMPRO is based on a combination of trend based and plan based forecasting, including growth totals for households and jobs at Local Planning Authority level from adopted Local Plans at the time when updating started for the TEMPRO version being used. TEMPRO does not assume that specific housing or employment site allocations or planning consents do or do not go ahead. The difference between the 'Do Nothing' scenario and the scenario which includes the development plan being assessed, shows the relative contribution of that development plan to changes in traffic movements.

Table 9: Signatory position on forecasting background growth

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		Natural England	Mid Sussex District Council
East Sussex County Council			
Tandridge District Council			
Lewes District Council			
Eastbourne Borough Council			
Sevenoaks District Council			
West Sussex County Council			
Crawley Borough Council			
Tunbridge Wells Borough Council			
Rother District Council			

2.24 The named authorities agree with this approach for the following reasons: The approach outlined above follows a logical, clear and robust methodology and uses TEMPRO - an industry standard database tool across Great Britain and therefore forecasting using TEMPRO has a high degree of consistency. It shows the predicted in combination growth of a Local Plan with other plans and projects along with the predicted relative contribution of that Local Plan to any change.

2.25 Mid Sussex District Council reserves judgement in regards the approach set out above for the following reasons: Mid Sussex agrees with the use of TEMPRO as a source of basic growth assumptions, but suggests that care is needed in the specification of the 'do nothing' or reference case and development plan case.

Air quality calculations

2.26 The key features of the air quality calculations methodology are set out in Appendix 6 of this Statement. The AFWG has discussed the following elements of air quality calculations, which are used to support the air quality HRA work and agree/disagree with the following:

Chemicals monitored and assessed in forecasting

2.27 Nitrogen oxides (NOx which includes nitric oxide (NO) and nitrogen dioxide (NO^2)), Nitrogen deposition (N), Acid Deposition, and ammonia (NH^3). The chemicals listed here (excluding ammonia) are those included within the standard methodology8.

Table 10: Signatory position on the chemicals to be monitored and assessed in forecasting

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		East Sussex County Council	
Lewes District Council		West Sussex County Council	
Eastbourne Borough Council			
Natural England			
Crawley Borough Council			
Sevenoaks District Council			
Tunbridge Wells Borough Council			
Rother District Council			
Tandridge District Council			
Mid Sussex District Council			

2.28 The named authorities agree with this approach for the following reasons. The approach outlined above is based on the industry standard methodology. Ammonia is agreed to be included as best practice going forward in assessment of Ashdown Forest on the basis of specific suitable evidence available.

2.29 These named authorities have no position in regards to this approach for the following reasons:

- West Sussex County Council: WSCC are not actively involved in this work to date.
- East Sussex County Council: ESCC are not actively involved in this work to date.

Conversion rates from NOx to N

2.30 This process involves two stages. Firstly, NOx to NO^2 conversion is calculated using Defra's NOx to NO^2 calculator. Secondly, for N deposition, the NO^2 value is multiplied by 0.1, as set

[8] Design Manual for Roads and Bridges, Chapter 11, Section 3, Annex F

out in the Design Manual for Roads and Bridges[9] (DMRB) guidance. The multiplication of NO_x concentrations by a factor is a standard approach set out in DMRB and in Environment Agency guidance[10] or as provided in updated guidance.

Table 11: Signatory position on conversion rates from NOx to N

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		West Sussex County Council	Mid Sussex District Council
Lewes District Council		East Sussex County Council	
Eastbourne Borough Council			
Crawley Borough Council			
Natural England			
Sevenoaks District Council			
Tandridge District Council			
Tunbridge Wells Borough Council			
Rother District Council			

2.31 The named authorities agree with this statement for the following reasons. The approach outlined follows established guidance as set out in the Design Manual for Roads and Bridges and by the Environment Agency.

2.32 These named authorities have no position in regards to this approach for the following reasons:

- West Sussex County Council: WSCC are not actively involved in this work to date
- East Sussex County Council: ESCC are not actively involved in this work to date.

2.33 Mid Sussex District Council reserves positon in regards the approach set out above for the following reasons: Mid Sussex reserves its position and will take advice from its advisors on this issue at the point of future assessment.

Background improvement assumptions

2.34 The only Government guidance on this issue (from Defra and DMRB) indicates that an improvement in background concentrations and deposition rates of 2% per annum should be assumed. However, the modelling undertaken by AECOM takes a more cautious approach. Improvements in background concentrations and emission rates follow Defra/DMRB assumed improvements up to 2023, but with background rates/concentrations then being frozen for

[9] The Design Manual for Roads and Bridges: http://www.standardsforhighways.co.uk/ha/standards/dmrb/index.htm

[10] Environment Agency. (2011). *Air Quality Technical Advisory Group 06 - Technical guidance on detailed modelling approach for an appropriate assessment for emissions to air.*

the remainder of the plan period. This is considered a realistic worst case and, averaged over the plan period, is in line with known trends in nitrogen deposition.

Table 12: Signatory position on background improvement assumptions set out in paragraph 2.39

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		East Sussex County Council	Mid Sussex District Council
Lewes District Council		West Sussex County Council	
Tandridge District Council		Crawley Borough Council	
Eastbourne Borough Council			
Natural England			
Sevenoaks District Council			
Tunbridge Wells Borough Council			
Rother District Council			

2.35 The named authorities agree with this statement for the following reasons: The approach outlined above is considered robust and reasonable. It takes a precautionary approach using a realistic worst case scenario. There is a long history of improving trends in key pollutants (notably NOx) and in nitrogen deposition rates, and there is no reason to expect that will suddenly cease; on the contrary, there is every reason to expect the rate of improvement to increase as more national and international air quality improvement initiatives receive support.

2.36 These named authorities have no position in regards to this approach for the following reasons:

- Crawley Borough Council; the evidence to support the adopted Local Plan screened out the need to undertake an air quality assessment and therefore Crawley has no position as we have not commissioned expertise
- West Sussex County Council: WSCC are not actively involved in this work to date.
- East Sussex County Council: ESCC are not actively involved in this work to date.

2.37 Mid Sussex District Council reserves positon in regards the approach set out above for the following reasons: Mid Sussex reserves its position and will take advice from its advisors on this issue at the point of future assessment.

Rate of dispersal from the road

2.38 The use of the dispersion model ADMS-Roads, by Cambridge Environmental Research Consultants, calculating at varied intervals back from each road link from the centre line of the road to 200m, with the closest distance being the closest point to the designated sites to the road.

Table 13: Signatory position on the rate of dispersal from the road used

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		East Sussex County Council	Mid Sussex District Council
Lewes District Council		West Sussex County Council	
Tandridge District Council			
Eastbourne Borough Council			
Natural England			
Crawley Borough Council			
Sevenoaks District Council			
Tunbridge Wells Borough Council			
Rother District Council[11]			

2.39 The named authorities agree with this statement for the following reasons: This approach follows the Department of Transport's Transport Analysis Guidance which advises "Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant". In modelling work undertaken for the HRA for the South Downs Local Plan and Lewes District Local Plan, modelled transects show that NOx concentrations and nitrogen deposition rates are forecast to fall to background levels well before 200m from the roadside, therefore there is no value in extending transects any further.

2.40 These named authorities have no position in regards to this approach for the following reasons:

- West Sussex County Council: WSCC are not actively involved in this work to date
- East Sussex County Council: ESCC are not actively involved in this work to date.

2.41 Mid Sussex District Council reserves positon in regards the approach set out above for the following reasons: Mid Sussex reserves its position and will take advice from its advisors on this issue at the point of future assessment.

Type of habitat included in the assessment e.g. woodland and heathland

2.42 Taking the precautionary approach it is assumed that pristine heathland (the SAC feature) is present, or could be present in the future, at any point on the modelled transects irrespective of existing habitat at that location. However, it is recognised that in practice there are affected areas in which heathland is not present and may never be present (as outlined by Natural England below) and this would need including in ecological interpretation of results'.

[11] RDC's position is one of agreement, on the express basis (perhaps as a footnote) that this is accepted as being the reasonable the position of Natural England, as the Government's advisors.

Table 14: Signatory position on the type of habitat included in the assessment

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		East Sussex County Council	
Tandridge District Council		West Sussex County Council	
Lewes District Council			
Eastbourne Borough Council			
Natural England			
Crawley Borough Council			
Tunbridge Wells Borough Council			
Sevenoaks District Council			
Rother District Council[12]			
Mid Sussex District Council			

2.43 Natural England add: This is an appropriate method for screening but on the ground it is rarely the case that all areas of a designated site will include all designated features. There are a number of reasons for this; sometimes features are SSSI notified but not part of the SAC/SPA notification and often a site boundary runs to a recognisable feature such as a field boundary or road for practicality reasons. Therefore areas of site may be considered site fabric as they do not contain and never will contain notified features of an N2K designation. This is something that is considered on a site by site basis dependant on specifics and on conservation objectives. If required the "on the ground" characteristics may be used for more detailed screening or if further assessment is required to ascertain whether plans or projects will have an adverse effect on the integrity of the site.

2.44 The named authorities agree with this statement for the following reasons. The approach outlined above takes an appropriate, precautionary and practical approach in modelling and ecological interpretation.

2.45 These named authorities have no position in regards to this approach for the following reasons:

- West Sussex County Council are not actively involved in this work to date
- East Sussex County Council are not actively involved in this work to date.

Ecological Interpretation

2.46 The section covers principles and methodology for the interpretation of the air quality modelling work to understand the impact of air quality changes on the ecology of Ashdown Forest SAC.

[12] [12] RDC's position is one of agreement, on the express basis (perhaps as a footnote) that this is accepted as being the reasonable the position of Natural England, as the Government's advisors.

2.47 The development of dose-response relationships for various habitats13 clarifies the rate of additional nitrogen deposition that would result in a measurable effect on heathland vegetation, defined as the loss of at least one species from the sward. For lowland heathland it is indicated that deposition rates of c. 10-15kgN/ha/yr (representative of the current and forecast future deposition rates using background mapping) an increase of 0.8-1.3kgN/ha/yr would be required for the loss of one species from the sward14. The sites covered in the research had a range of different 'conditions' but the identified trends were nonetheless observable. The fact that a given heathland site may not have been included in the sample shouldn't be a basis for the identified trend to be dismissed as inapplicable. On the contrary, the value of the dose-response research is precisely in the fact that it covered a range of sites, subject to a mixture of different influences, meaning that consistent trends were identified across sites despite differing conditions at the sites involved. Based on the consistent responses (in terms of trend) across the range of habitats studied there is no reason why the identified trends (which have been identified as applying to bogs, lowland heathland, upland heathland, dunes and a range of other habitats) should not apply to all types of heath.

2.48 There is a legal need to consider/identify whether there is an 'in combination' effect. However, there is no automatic legal assumption that all contributors to any effect must then mitigate/address their contribution, no matter how small. Not all contributors to an effect will be equal. Far more likely is that there will be a small number of contributors who are responsible for the majority of the exceedance. The identification of those contributors who need to mitigate must be ultimately based on whether mitigating/removing their specific contribution will actually convey any protection to the European site in terms of achieving its conservation objectives (since this is the purpose of the Habitats Directive) and/or whether mitigating the contribution of certain contributors to any effect will sufficiently mitigate that effect.

2.49 Within the context of a forecast net improvement in nitrogen deposition, rather than a forecast net deterioration, available dose-response data make it possible to gauge whether the air quality impact of a given plan is not just of small magnitude (which could still meaningfully contribute to an effect 'in combination') but of such a small magnitude that its contribution may exist in theory (such as in the second decimal place of the air quality model) but not in practice on the ground. Such a plan would be one where it could be said with confidence that: (a) there would not be a measurable difference in the vegetation whether or not the plan proceeded, and (b) there would not be a measurable effect on the vegetation whether or not the contribution of the plan was 'mitigated' (i.e. reduced to the extent that it did not appear in the model at all). It would clearly be unreasonable to claim that such a plan would cause adverse effect 'in combination' or that it should be mitigated.

[13] Caporn, S., Field, C., Payne, R., Dise, N., Britton, A., Emmett, B., Jones, L., Phoenix, G., S Power, S., Sheppard, L. & Stevens, C. 2016. Assessing the effects of small increments of atmospheric nitrogen deposition (above the critical load) on semi-natural habitats of conservation importance. Natural England Commissioned Reports, number 210.

[14] The cited rates are presented Table 21, page 59 of Caporn et al 2016, to illustrate the trends identified (which apply not just to species richness but, as illustrated by other tables in the same report, to other parameters). That table states that at a background rate of 10kgN/ha/yr an additional 0.3 kgN/ha/yr was associated with a reduction in species richness of '1' in lowland heathland sites. At a background rate of 15kgN/ha/yr the same effect was associated with an incremental increase of 1.3 kgN/ha/yr.

Table 15: Signatory position on ecological interpretation as part of assessments

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		West Sussex County Council	
Lewes District Council		East Sussex County Council	
Tandridge District Council			
Eastbourne Borough Council			
Natural England			
Crawley Borough Council			
Tunbridge Wells Borough Council			
Sevenoaks District Council			
Rother District Council[15]			
Mid Sussex District Council			

2.50 These named authorities agree with this opinion for the following reasons: The approach outlined above takes an appropriate, precautionary and practical approach in modelling and ecological interpretation.

2.51 These named authorities have no position in regards to this approach for the following reasons:

- West Sussex County Council are not actively involved in this work to date.
- East Sussex County Council are not actively involved in this work to date.

Need for mitigation or compensation measures

2.52 The AFWG has discussed the possible findings of air quality work currently being undertaken, including the potential need for mitigation or compensation for air quality impacts associated with growth identified in Local Plans.

2.53 At present, published HRAs for adopted or emerging Local Plans have not concluded that mitigation or compensation is currently required. However, it is also recognised that the outcomes of ongoing technical modelling and assessments cannot be predicted or pre-determined. In this light, the AFWG recognises the value of early discussion of as a 'back-pocket' exercise, just in case they subsequently prove necessary. It is emphasised that initial suggestions and consideration of potential mitigation/solutions/compensation should not be interpreted as either a recognition that they will prove necessary, nor as a commitment to eventually pursuing such measures.

[15] [15] RDC's position is one of agreement, on the express basis (perhaps as a footnote) that this is accepted as being the reasonable the position of Natural England, as the Government's advisors.

2.54 It is recognised that Wealden District Council as the SAC host, and Natural England, will necessarily have the key lead roles in identifying potential mitigations and/or compensation to benefit the SAC, although all parties may contribute. It is agreed to maintain a table of mitigation options in a transparent manner on an ongoing basis. This should enable all parties to be fully prepared for the possibility of needing to address effects on the SAC, enabling them to do so (if required) without causing undue delay to the planning process.

Table 16: Signatory position with regard to the need for mitigation or compensation measures

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority		East Sussex County Council	
Sevenoaks District Council		West Sussex County Council	
Lewes District Council			
Eastbourne Borough Council			
Tandridge District Council			
Tunbridge Wells Borough Council			
Crawley Borough Council			
Natural England			
Rother District Council			
Mid Sussex District Council			

2.55 These named authorities have no position in regards to this opinion for the following reasons:

- West Sussex County Council are not actively involved in this work to date.
- East Sussex County Council are not actively involved in this work to date.

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 Local Plans. The AFWG will continue to share evidence and information, and will work cooperatively together to discuss potential mitigation measures just in case need for these should arise, and will consider other measures to reduce the impact of nitrogen deposition around the Forest as matter of general good stewardship.

3.2 The Government consultation document 'Planning for the right homes in the right places' proposes as a minimum that SCG will need to be updated each time a signatory authority reaches a key milestone in the plan making process. The AFWG recognises that this SCG will need to be updated regularly in line with emerging Government policy and in order to reflect emerging evidence and established knowledge of air quality impact on European nature conservation designations.

Table 17: Signatory position on actions going forward for the AFWG

Agree	Disagree	No Position	Reserve judgement
South Downs National Park Authority			
Sevenoaks District Council			
Tandridge District Council			
Lewes District Council			
East Sussex County Council			
Eastbourne Borough Council			
Crawley Borough Council			
Natural England			
West Sussex County Council			
Tunbridge Wells Borough Council			
Rother District Council			
Mid Sussex District Council			

4. Summary conclusions

4.1 This Statement of Common Ground has been signed by the following authorities and will be submitted by the SDNPA as part of the evidence base supporting the South Downs Local Plan in April 2018.

Signature:

Logo:

South Downs National Park Authority

Date: 12/04/2018

Position: Director of Planning

Authority:
South Downs National Park Authority

Signature:

Logo:

Crawley Borough Council

Date: 09/04/2018

Position: Head of Strategic Housing and Planning Services (Officer)

Authority:
Crawley Borough Council

Signature:

Logo:

East Sussex County Council

Date: 04/04/2018

Position: Head of Planning & Environment

Authority:
East Sussex County Council

Signature

Logo:

Lewes District Council

EASTBOURNE Borough Council

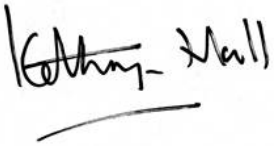
Working in partnership with Eastbourne Homes

Date 03/04/2018

Position: Head of Planning (Officer)

Authority:
Lewes District and Eastbourne Borough Councils

Signature :



Logo:

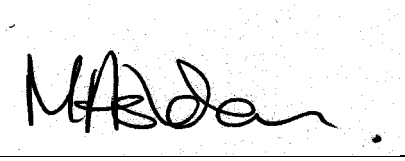
MID SUSSEX DISTRICT COUNCIL

Date: 12/04/2018

Position: Chief Executive

Authority:
Mid Sussex District Council

Signature:



Logo:

NATURAL ENGLAND

Date 09/04/2018

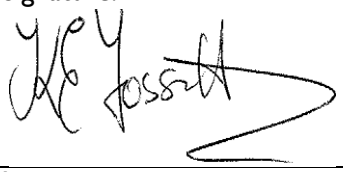
Position: Sustainable Development Senior Adviser - Sussex and Kent Team

Organisation:
Natural England

Signature:
Logo:
Date: 12/04/2018
Position: Director of the Strategy & Planning Service
Authority: Rother District Council

Signature:
Logo:
Date: 06/04/2018
Position: Chief Planning Officer
Authority: Sevenoaks District Council

Signature:
Logo:
Date: 30/03/2018
Position: Strategic Director of Place
Authority: Tandridge District Council

Signature: 
Logo:
Date: 03/04/2018
Position: Head of Planning and Transportation
Authority: Tunbridge Wells Borough Council

Signature:
Logo:
Date: 09/04/2018
Position: Head of Planning Services
Authority: West Sussex County Council

Appendix 1: Ashdown Forest SAC Reasons for Designation

The text below is extracted from the Habitats Regulations Assessment for the Pre-submission South Downs Local Plan, published for consultation in September 2017.

1.1 Introduction

Ashdown Forest contains one of the largest single continuous blocks of lowland heath in south-east England, with both European dry heaths and, in a larger proportion, wet heath.

1.2 Reasons for Designation

SAC criteria

The site was designated as being of European importance for the following interest features:

Wet heathland and dry heathland

Great crested newts

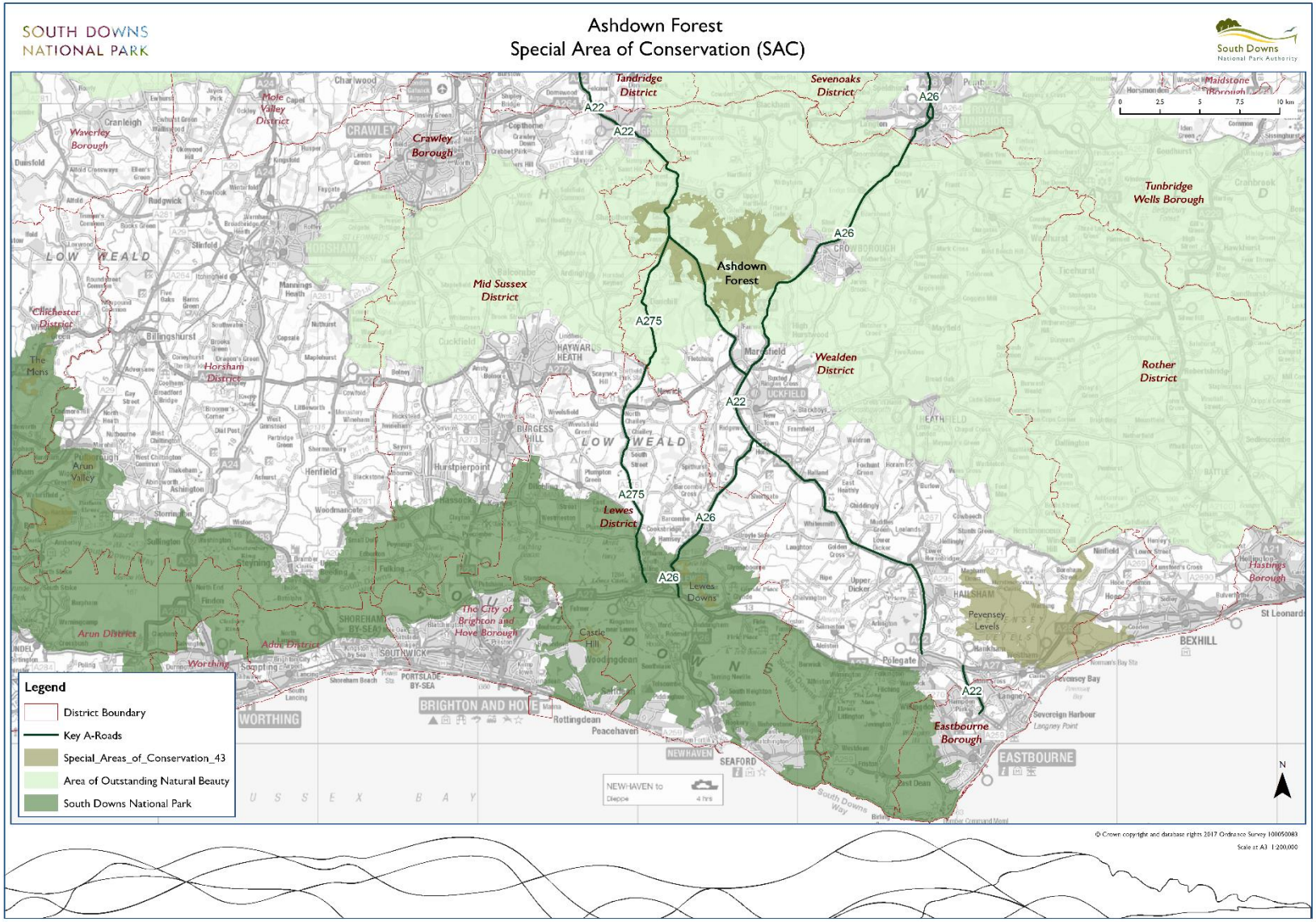
1.3 Historic Trends and Current Pressures

During the most recent condition assessment process, 99% of the SSSI was considered to be in either 'favourable' or 'unfavourable recovering' condition.

The following key environmental conditions were identified for Ashdown Forest SAC/SPA:

- Appropriate land management
- Effective hydrology to support the wet heathland components of the site
- Low recreational pressure
- Reduction in nutrient enrichment including from atmosphere.

Appendix 2: Map of Ashdown Forest



Appendix 3: Notes from Ashdown Forest Working Group meetings: May 2017 to January 2017

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

NOTES OF MEETING ASHDOWN FOREST 10:00 AM, 9TH MAY 2017 EASTERN AREA OFFICES, STANMER PARK, BRIGHTON & HOVE

Attendees:

Marian Ashdown (MA) – Natural England

Marina Brigginshaw (MB) – Wealden District Council

Sharon Evans (SE) - Tunbridge Wells Borough Council

Jennifer Hollingum (JH) - Mid Sussex District Council

Ellen Reith (ER) – East Sussex County Council

Kelly Sharp (KS) – Wealden District Council

Tondra Thom (TT) – Lewes and Eastbourne Councils

Sarah Thompson (ST) – Tandridge District Council

Chris Tunnell (CT) – Mid Sussex District Council

Lucy Howard (LH) – South Downs National Park Authority

Sarah Nelson (SN) - South Downs National Park Authority

Kate Stuart (KS) - South Downs National Park Authority

Alma Howell (AH) - South Downs National Park Authority

1. Introductions and Reasons for Meeting	**Actions**
LH outlined the aims of this meeting which are to discuss: • agreeing to work collaboratively on the issues; • agreeing to share information and existing work to assist in traffic modelling for HRA work; • setting up a working group.	
2. Key stages with Local Plans and HRA timetables SDNPA's Local Plan - Pre-Submission Consultation in September 2017 Tunbridge Wells Local Plan - Issues and Options consultation this Autumn Wealden Local Plan - Pre-Submission Consultation this Autumn Lewes Local Plan Part 2 – Allocations and DM Policies - Pre-Submission Consultation this Autumn Tandridge Local Plan - Pre-submission public consultation early next year Mid Sussex Local Plan – At Examination	

3. Moving on from High Court Decision LH highlighted that we now need to draw a line under the High Court decision as there will be no appeals or cross appeals. She explained that the group should agree to move forward together to address in combination effects of traffic generation on Ashdown Forest SAC and other affected SAC's.	All agreed to acknowledge the ruling and agreed to move forward together to address the in combination effects of traffic generation on Ashdown Forest SAC and other SACs
4. Wealden DC's latest work on HRA and Ashdown Forest LH introduced this item explaining that WDC had undertaken a large amount of work on this matter and that it would be very useful to the group if WDC could set out the main studies, timetables and output for this work. This is because all local authorities affected by this issue need to be broadly using the same information and working from the same base conditions. MB and KS outlined the work that Wealden had undertaken over the last four years which includes air pollution monitoring on the forest, traffic monitoring, ecology work and transport modelling of future scenarios looking at Wealden's growth alone and in combination with other local authorities. MB agreed to set out in an email to the group the methodologies of the work undertaken so far. LH also mentioned the email that David Scully from Tunbridge Wells had sent to her in advance of the meeting raising a number of technical questions with regards to Wealden's work. MB agreed to try and answer the queries if the email could be sent directly to her and she would copy her response to all. It was also suggested that it would be helpful if this email also explained the issue with using 1000 AADT as the threshold rather than 1% process contribution.	MB to send an email to all setting out the details of methodology of work undertaken so far. LH to send David Scully's email to MB and cc all MB to reply including in her response the issue re:1000 AAD and cc all .
5. Natural England's latest work on air quality methodology for HRA's MA explained that in combination effects relating to air pollution on SAC's are complex and widespread and that this is a national issue and a priority for NE. NE has set up a project group to look specifically at this issue in relation to all protected sites in the South East that have exceeded their critical load. New internal guidance is being prepared to help NE specialists provide advice to local authorities undertaking HRA's and will be available in mid-June. This will include where to obtain data, habitat trends, APIS information etc. as well as guidance on policy, avoidance and compensatory measures. The group agreed that it would be useful if some of this information could be sent directly to them. MA questioned why Rother had not been included in this group. It was agreed that Rother, Crawley and Brighton and Hove should be included. MB agreed to check with their consultants where they felt the main traffic movements were occurring and which authorities were affected.	MA to send to group useful information from this guidance LH to invite Rother, Crawley and B&H to be part of group and attend future meetings.

	MB to check with consultant s which other local authorities are likely to be affected by this issue
6. Sharing and Understanding evidence LH said that we need to share what information we have and need. The first year of Wealden's air pollution monitoring baseline data is in the public domain. Wealden are unable to share other year's data and outcomes at the present time as they need to be sure, before it enters the public arena, that it is robust and the peer review has been completed. The peer review of this work is being undertaken by academics at The Centre of Hydrology and Ecology. A report setting out the results of this work would likely be published in July/August of this year. Wealden are willing to give raw data to Natural England for their specialist to interpret. NE will specify what they need to MB/KS who will endeavour to provide this. Mid Sussex has used the West Sussex Transport Model and TEMPRO data to assess in combination effects. They are looking at possible areas of the District where development here would not generate traffic on Ashdown Forest.	 LH to circulate table to ascertain who has what information MA to speak to NE's air pollution specialists to identify what data they need. MA then to email MB/KS who will supply the data and cc the group
7. Policy solution options to Nitrogen deposition The group discussed possible wider longer term solutions such as the creation of a Low Emission Zone and improvements to A27. MA explained that NE wished to encourage the creation of Shared Nitrogen Action Plans (SNAPs) which is something this group could establish and lead on as a way of reducing background levels of Nitrogen. The biggest contributor to nitrogen deposition on the Ashdown Forest is agriculture. All agreed that this would be a useful way forward for the group and would highlight that the local authorities were working collaboratively and identifying solutions. Developer contributions could be used to fund projects identified from this to reduce Nitrogen levels JH highlighted that there was some information on SNAPs on the NE website and she would send the links to this to the group.	 JH to send web link to SNAPs to group. All agreed that this group should establish a SNAP as a way forward and longer term solution
8. Working Collaboratively as an Officer Group All agreed that the setting up of this group was extremely useful and that we should meet monthly. SDNPA would service the group in terms of chair, agenda and minutes. The venue would alternate between Stanmer and Mid Sussex and possibly a community centre in Wealden. MA explained that Tuesdays were not a good day for her to meet and the group proposed Wednesday as an alternative.	All agreed to set up a working group on Ashdown Forest SDNPA to send out notes of meeting and make arrangements for next monthly meeting.

In terms of cross boundary working and Member Briefing it was felt that the East Sussex Local Planning Managers Group and East Sussex Strategic Planning Members Group might be useful bodies to report to. However it was recognised that Mid Sussex, Tandridge and Tunbridge Wells were not members of these groups. It was important that officers reported back to their own members.	
9. AOB CT raised the issue of current planning applications that are caught by the High Court Ruling and whether Grampian conditions might be a way forward. MB suggested that this should only be considered once an HRA of the application had been carried out. However in the first instance she advised that a legal opinion should be sought.	

NOTES OF MEETING ASHDOWN FOREST 10:00 AM, 21st JUNE 2017 EASTERN AREA OFFICES, STANMER PARK, BRIGHTON & HOVE

Attendees:

Marian Ashdown (MA) – Natural England

Marina Brigginshaw (MB) – Wealden District Council

Sharon Evans (SE) - Tunbridge Wells Borough Council

Hannah Gooden (HG) – Sevenoaks District Council

Lucy Howard (LH) – South Downs National Park Authority

Pat Randall (PR) – East Sussex County Council

Ellen Reith (ER) – East Sussex County Council

Vivienne Riddle (VR) – Tandridge District Council

David Scully (DS) – Tunbridge Wells Brough Council

Kate Stuart (KS) - South Downs National Park Authority

Tondra Thom (TT) – Lewes and Eastbourne Councils

Sarah Thompson (ST) – Tandridge District Council

David Marlow (DM) - Rother District Council

10. Introductions and reasons for meeting • Group introduced themselves and welcomed new attendees.	**Actions**
11. Minutes and actions from last meeting Group went through the minutes to check actions were completed. Key updates to note:	• LH to ask Mid Sussex for contact at Crawley • LH to invite West Sussex County

• Natural England Guidance – not yet available as it is still being developed. The internal guidance document will be made available to staff at Natural England and it is hoped that the salient points can be picked out in order to assist LPAs with their Appropriate Assessments. • Attendees of the group – agreed that Crawley, Brighton (Steve Tremlett suggested as contact point) and West Sussex to be invited to the group, and that Kent and Surrey County Councils should be made aware of the group. • Evidence table (outlines the evidence held by authorities which are part of the group) – agreed that completing this now is premature as there is a lot of evidence/assessment currently being undertaken/finalised. Agreed that it should be filled out in the autumn. • NE were to make a detailed request to WDC about what data they would like to see – NE and WDC are in discussion.	Council and Brighton to next meeting • LH to make Kent and Surrey County Councils aware of the group
12. Legal advice sought on Ashdown Forest • Legal advice already sought by TWBC. • Technical advice intended to be sought by WDC (primarily to do with PDL) and also LDC and SDNPA. • Advised that the latest position from Mid Sussex is available on their website. MSDC hearings regarding Ashdown Forest to be held on 24/25th July.	• LH to share QC comments on Ashdown Forest from the Minerals Conference • ALL – those getting legal advice to share the gist of that advice with the group.
13. Air quality and traffic modelling updates • All agreed in principle to use broadly the same modelling approach (other than WDC as already progressed with own model). • All agreed in principle to share data to ensure consistency of inputs in models. • It is noted that all except WDC and MSDC are using AECOM for HRA work. • Discussed at what point development levels are taken into account – adoption/submission/publication? It was noted that TEMPRO uses growth figures as of 2014 TEMPRO can be adjusted to take into account subsequent Local Plan proposals. • It was noted that WDC have assessed all roads across Ashdown Forest, not just A roads. • It was commented that using travel to work data in the model may underestimate movements and therefore the associated impact of visitor numbers. • WDC do not have a date for the release of their HRA work – likely end of August.	• ALL – agreed to share data inputs for model. • LDC/SDNPA ask James Riley re. impact of visitors.
14. Progress with Local Plans • All progressing with Local Plans as per previous meeting. • WDC advised there is a delay in their timetable. WDC are looking to commence pre-submission consultation by the end of the year. WDC met with DCLG and had a positive meeting – no discussion of the phasing policy.	
15. Long term solutions including Strategic Nitrogen Action Plans (SNAP)	

• Agreed that this item would be held until a future meeting once HRA work has been progressed by authorities and findings are available. • Noted that Cath Jackson of NE is to be covering Ashdown Forest. Cath Jackson will be at the next meeting and a possible SNAP could be discussed then. • There was a discussion about SNAP. NE advise that SNAP is not suitable as mitigation because it doesn't have sufficient certainty.	
16. Wealden DC to provide an update on their transport model • Technical note on transport model circulated to authorities for their information. Update now received which looks at contribution from other authorities. WDC advise they are happy to circulate update.	MB – circulate update to office group.
17. AOB • WDC noted that there is an article in the HRA Journal that may be of interest which queries the 1%. Advised that the journal is subscription only. • WDC advise they are happy to share evidence individually with authorities, but also advise that some evidence is not yet feasible to share. • Agreed that the next meeting would be in August and held at MSDC offices in Haywards Heath.	LH – arrange next meeting for August JH – arrange meeting room at MSDC offices in Haywards Heath.

NOTES OF MEETING ASHDOWN FOREST 10:00 AM, 30th AUGUST 2017 MID SUSSEX DISTRICT COUNCIL, HAYWARDS HEATH

Attendees:

Marian Ashdown (MA) – Natural England (NE)

Marina Brigginshaw (MB) – Wealden District Council (WDC)

Kelly Sharp (KS) – Wealden District Council

Nigel Hannam (NH) – Wealden District Council

Hannah Gooden (HG) – Sevenoaks District Council

Jennifer Hollingum (JH) – Mid Sussex District Council (MSDC)

Lucy Howard (LH) – South Downs National Park Authority

Katharine Stuart (KS) – South Downs National Park Authority

David Marlow (DM) – Rother District Council

Ellen Reith (ER) – East Sussex County Council (ESCC)

Edward Sheath (ES) – East Sussex County Council

David Scully (DS) – Tunbridge Wells Borough Council (TWBC)

Aidan Thatcher (AT) – Lewes and Eastbourne Councils

Tondra Thom (TT) – Lewes and Eastbourne Councils (LDC)

Roger Comerford (RC) – Tandridge District Council

Ian Bailey – Tonbridge & Malling Borough Council

AGENDA ITEM	ACTION
18. Introductions and minutes from last meeting • Group introduced themselves and welcomed new attendees. • LH apologised for the lateness in sending out the minutes. Two corrections were agreed and revised minutes to be circulated. The following actions were still noted as outstanding: - LH to contact Crawley BC, WSCC, Surrey CC and Brighton & Hove CC - Update on WDC transport model not yet published although a technical note is available on line[16].	• LH to ask Mid Sussex for contact at Crawley • LH to invite West Sussex County Council and Brighton to next meeting • LH to make Kent and Surrey County Councils aware of the group
19. Wealden DC to provide update on air quality and ecology monitoring (MB) • WDC have received draft air quality reports on Pevensey Levels and Lewes Downs • WDC have received draft reports on air quality and ecology for Ashdown Forest. These are being checked through. Changes are needed to explain the outcomes from the model and statistical analysis more clearly. • Once agreed with consultants WDC will share with NE. • WDC committed to share with members of group after NE and before publication on website. This will hopefully be in September 2017. • LH queried the background nitrogen deposition text to A22 which at 50kgN/ha/year is much higher than the Defra mapping levels. MB explained that the Defra figures are the average across the SAC, whereas the WDC figures are by 2metres squared, i.e. more finely grained analysis. • NH explained that WDC and ESCC were working on expression of interest bids to the Housing & Infrastructure Fund on the introduction of mitigation and compensatory work for Ashdown Forest. The focus would be on low emission zones. Support from members of the group would help the expression of interest. A very swift turn around on the bid is	• WDC to share air quality and ecology monitoring first with NE then the wider group in September or shortly afterwards. • NH/ES/LH to draft wording and circulate around the group for agreement.

16 http://www.wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/CoreStrategy/CoreStrategyLibrary/Planning_Evidence_Base_Habitat_Regulations_Assessment.aspx

AGENDA ITEM	ACTION
required. The group agreed that this had to be very high level and not set out any detail.	
20. Transport modelling and in combination assessments (JH) • MSDC is updating their District Plan HRA following their Local Plan Hearings. MSDC is using the WSCC County Highways Model. The model takes account of background growth and growth in surrounding areas, using the National Trip End Model (NTEM) and TEMPRO assumptions. Amey are the consultants and JH will ask if data can be shared. • Discussion on the correct figures to use, i.e. 876 or 1,090 dwellings for MSDC. The Inspector verbally agreed at the Hearings that there are grounds for adoption of the District Plan at 876 dwellings per year to 2023/24 and then a figure of 1,090 dwellings per year thereafter subject to the Habitats Regulations Assessment. • It was agreed that we should agree all our housing figures to be used in our transport models in the statement of common ground. • Discussion on TEMPro. This includes allocations and permissions but there is a gap 2014-2017. All authorities present are using TEMPro in their modelling work. • Discussion on future NOx reductions. WDC are using figures different to Defra.	• JH to query sharing traffic data with Amey
21. Brief updates with Local Plans and HRAs • Covered elsewhere in meeting.	
22. A statement of common ground (SCG) on Ashdown Forest (LH) • We all need to meet the Duty to Cooperate and engage constructively, actively and on an ongoing basis on strategic cross boundary issues. The officer working group is a good starting point and a SCG on Ashdown Forest would help to formalise and drive the work forward. • LDC directors met with PAS who offered to work with the group on the statement. TT will progress with PAS. • TWBC have drafted a bilateral statement between themselves and WDC and are awaiting WDC response. DS agreed to share with group. The following was agreed by the group: • To be completed and agreed by January 2018 • It would set out matters that the group agreed and didn't agree on. • It would cover air quality matters only and not other matters such as recreational pressure • It would relate only to Ashdown Forest but there was the potential to replicate it for other international designations • It would agree the methodology assumptions for transport and air quality • It would agree housing numbers for all the LPAs to be used for traffic modelling • It would agree to share evidence and findings	• TT to contact PAS and invite to October meeting and find out level of support available • DS to circulate draft statement of common ground • NE to consider being a signatory

AGENDA ITEM	ACTION
• It would explain the role of the officer working group • It would cover planning policy and not planning applications. Neighbourhood plans would be covered under planning policy • NE to consider whether it should be a signatory. The feeling of the group was that NE is a very necessary partner to the statement • All LPAs present happy to progress and be signatory subject to content	
23. Update from Natural England (MA) • MA explained to the group that the guidance on HRAs was for internal use at NE. The group discussed that there was general confusion on the matter both at a local and national level.	
24. Current approach to planning applications (DS) • TWBC has received an objection to a planning application from WDC and have sought legal advice. • No other LPAs have received any objections • WDC confirmed that they are scrutinising weekly lists and objecting if an HRA has not been done when there is a net increase in traffic. • MSDC is undertaking a HRA screening for planning applications • WDC has not determined any planning applications that would result in a net increase in traffic. No appeals have been lodged on non-determination.	
25. AOB • NH said that a developer, planning agent and landowner stakeholder forum has been set up for Ashdown Forest and that WDC has been invited to the next meeting in September. • Next working group meeting to be held on 9th or 13th October.	LH – arrange next meeting for 9th or 13th October. JH – arrange meeting room at MSDC offices in Haywards Heath.

NOTES OF MEETING ASHDOWN FOREST 10:00 AM, 13th OCTOBER 2017 MID SUSSEX DISTRICT COUNCIL, HAYWARDS HEATH

Attendees:

Marian Ashdown (MA) – Natural England (NE)

Kelly Sharp (KSh) – Wealden District Council (WDC)

Nigel Hannam (NH) – Wealden District Council

Jennifer Hollingum (JH) – Mid Sussex District Council (MSDC)

Lois Partridge (LP) – Mid Sussex District Council (MSDC)

Lucy Howard (LH) – South Downs National Park Authority (SDNPA)

Katharine Stuart (KSt) – South Downs National Park Authority

Ellen Reith (ER) – East Sussex County Council (ESCC)

Edward Sheath (ES) – East Sussex County Council

David Scully (DS) – Tunbridge Wells Borough Council

Hannah Gooden (HG) – Sevenoaks District Council

Tondra Thom (TT) – Lewes and Eastbourne Councils

Roger Comerford (RC) – Tandridge District Council

Guy Parfect (GP) – West Sussex County Council

Jenny Knowles (JK) – Tonbridge and Malling Borough Council

Stephen Barker (SB) – Planning Advisory Service (PAS)

AGENDA ITEM	ACTION
1. Introductions and minutes from last meeting (LH) • Group introduced themselves and welcomed new attendees. • Run through of actions from previous meeting: o NH and ES: bid submitted by ESCC focussing on Hailsham linked to AF mitigation. Letter of support submitted. No response yet. ES will circulate documents. NH thanked group for support. o Regarding HRA work undertaken by WDC, see below. o RC queried if LPA contributions would be disaggregated. GP advises that this is problematic traffic may reroute differently.	• ES to circulate Expression of Interest documents to group
2. Wealden DC and Natural England to provide update on air quality and ecology monitoring (KS & MA) • WDC have sent draft reports on Ashdown Forest SAC, Pevensey Levels SAC and Lewes Downs SAC to NE for their review. • These reports will be circulated to this officer group toward the end of week commencing 16th October 2017, and will be published on WDC website one week after circulation. • The work shared and published will be methodology and air quality work for Ashdown Forest – it will not include the ecology work as WDC have commissioned further work on this. • WDC has a DAS agreement with NE • NE will review the work produced by WDC and will include their in house air quality specialist. • KSh for WDC raised concerns regarding ammonia pollution arising from catalytic converters fitted to vehicles. MA notes that ammonia dissipates quickly. Discussion then began regarding Strategic Nitrogen Action Plans (SNAP): • MA confirmed that NE sees merit in a SNAP for Ashdown Forest. SNAP would reduce background nitrogen. • RC circulated a table of potential mitigation and solutions	• WDC to circulate reports to the officer group toward end of week commencing 16th October 2017. • LH to add SNAP to a future full officer group meeting (not SCG subgroup meeting). • MA to invite NE officer to SNAP meeting when date known. • MA to confirm that NE input into SNAP wouldn't be charged.

options, requesting that group members take shared ownership of this as a continuing 'live' piece of work, adding comments, updates and suggestions as they see fit. MA advise that the habitat management options would not be suitable as this would conflict with the reasons for the site designation. Other suggests could usefully feed into a SNAP. MA reiterated the key role of agriculture in the high background levels. To a lesser extent emissions from power stations on the continent also contribute. Noted that due to dispersal of pollution, Gatwick Airport was not a specific direct issue, rather a wider regional issue. • TT reiterated, and MA confirmed LPAs, take action based on their own relative contribution – process contribution. • Officer Group agrees to produce a SNAP. SNAP to be added to the agenda for a future meeting (full officer group meeting rather than SCG sub-group meetings). • Advisor for management of Ashdown Forest from NE to attend future SNAP meeting. Cath Jackson likely to not be	
3. Update on South Downs Local Plan, HRA and background paper (KSt) Local Plan update • Reg 19 Pre-Submission South Downs Local Plan consultation began on 26th September. It will run for 8 weeks until 21st November. HRA work • Air quality Appropriate Assessment work is set out in two sections: o Ashdown Forest: commissioned jointly with LDC and the methodology and results are set out in an addendum at the back of the report. o Other designations in and round the National Park: methodology is set out in section 2.6 and the results discussed in section 5.3. o Link to HRA: https://www.southdowns.gov.uk/wpcontent/uploads/2016/11/SDNPA-HabitatsRegulations-Assessment.pdf • Methodology: In-combination assessment undertaken using TEMPRO. Adjusted for the higher expected development likely to come forward in Local Plan around Ashdown Forest. Then air quality calculations for NOx and N were undertaken. Ecological interpretation was then done to establish the extent and significance of any changes expected. No thresholds (e.g. 1000 AADT) were used – all road links were subject to assessment at all stages. • Results: o Traffic: 5 key links modelled. In-combination traffic increase on all links between c.950 and c.3000 AADT. LDC/SDNPA contribution small between 0 and 260 AADT. o Air Quality: Currently above critical level for NOx on 3 of the routes. All expected to reduce to below critical level over the plan period even with AADT increases expected. For N deposition, improvements in background more than offset the additional from car movements. On A26 and A275 the LDC/SDNPA contributions slow this slightly within the first 5m of the road by 0.01kgN/ha/yr. • Conclusion re. Ashdown Forest: No adverse effect on integrity on the Ashdown Forest SAC alone or in combination with other plans and projects.	• KSt to circulate links (found in the minutes)

• Conclusion re. other designations: Same as above, but with a recommendation to monitor designations close to the A3 corridor, which brings in line with the approaches of other nearby Local Plans. • NH queried the reduction in background N deposition. KSt responded that a % assumption in N reduction is used based on guidance from Institute of Air Quality Management and DMRB. 2% is the DMRB recommendation. SDNP/LDC have taken a precautionary approach and applied 2% for the first half and no improvement for the last half of the plan period – averaging to 1%. Principle was agreed. • Biodiversity background paper published on SDNPA website.	
4. Update from Mid-Sussex on HRA (JH) • Agenda item not discussed.	
5. PAS support for the Statement of Common Ground (SCG) looking at (SB): • SB introduces SCG and role of PAS: o Right Homes in the Right Places consultation introduces mandatory SCG o PAS and DCLG are keen to get some early learning on them o The purpose of SCG is to help the challenges around Duty to Co-operate – to make sure that opportunities to address matters prior to examination are taken and to clearly set out the key strategic cross boundary issues and actions to planning inspectors. o It is thought that SCG would consist of two parts: (1) geography and issues and (2) action plan o SCG would be a short document, signed by LPAs and other, and would generally need political sign off. It would be a living breathing document that would be updated whenever a signatory gets to a new stage in the plan making process. o SCG could be a helpful mechanism for unlocking infrastructure funding and other government funding. o PAS would like to work with 8 or so pilot groups to gather key learning ahead of the NPPF redraft – key window is next 9 weeks. NPPF draft is expected for a consultation (on wording rather than principles of content which were consulted upon over the last year or so) in January 2018 and final publish in March 2018. o In principle, DCLG would like preliminary SCG to be published by all authorities 6 months after publish of NPPF redraft (Sept 2018) and a full SCG 6 months after that (Mar 2019). o PAS can facilitate meetings and support write up of SCG. • LH confirms interest of the group in becoming a PAS supported pilot, and confirms that the group are working toward completing a draft SCG for January.	
6. A Statement of Common Ground on Ashdown Forest: follow on discussion (LH) • Format of document: o SB advises that, as currently set out, each authority is expected to produce one SCG which sets out the various strategic cross boundary issues and actions, and other LPAs and stakeholders are signatories to the relevant parts of the document e.g. meeting housing need would be one section of the SCG and members of the HMA would be signatories to that part. o The group discussed and considered that this approach wouldn't work due nature of the issue, the large number of signatories and the timetable needs of the officer group.	• All-Further work required to establish geographical scope and signatories • SB to provide risk register template to LH/KSt • SB to advise LH

o SB and group agree that the Ashdown Forest Officer group will produce an AF specific SCG which can be cross referred to in LPAs wider SCG. o Agreed that the SCG on AF itself will cover multiple issues and not everyone needs to sign up to everything. For example: MA says that NE will be a signatory but only to issues on which they have a view. • Geographical scope: o The group recognised that establishing the geographical scope of the SCG would be a key issue for determining signatories. What is the extent of influence to warrant being a signatory? The scale of each LPA's contribution (process contribution) to the issue will also be a relevant factor for determining signatories. This will require further work by the group. • A risk register will need to be produced. LH asks if SB can provide a template. SB agreed. • SB advises that there is no SCG template yet – the pilots will help in producing one which may be included within the redrafted NPPF. • PAS facilitator will not be SB – SBV to advise LH and TT of who they will be. • Way forward: • All-Further work required to establish geographical scope and signatories • SB to provide risk register template to LH/KSt • SB to advise LH and TT who the PAS facilitator will be • All to provide information on their LP timetable, sign off process and housing numbers. • LH to circulate meeting invites for 10th November and week commencing 20th November o A series of meetings will be scheduled to work on these issues and draft the SCG: (1) geographical scope, signatories, governance arrangements, risks, establishing what the other elements of the scope are (previously agreed as air quality matters, methodology assumptions, housing numbers, sharing evidence and policy not applications), LP timetables. (2) all day workshop on issues and actions. Further meetings will be required to be decided depending on outcomes of the above. o Meetings to be attended by a self-selected subgroup o SDNPA will provide administrate support for the group. o All will need to speak with members regarding sign off and provide info to the group on their sign off process.	and TT who the PAS facilitator will be • All to provide information on their LP timetable, sign off process and housing numbers. • LH to circulate meeting invites for 10th November and week commencing 20th November
7. Any other business (LH) • None.	

Attendees:

Edward Purnell (EP) – Wood on behalf of Planning Advisory Service (PAS)

Marian Ashdown (MA) – Natural England (NE)

Kelly Sharp (KSh) – Wealden District Council (WDC)

Jennifer Hollingum (JH) – Mid Sussex District Council (MSDC)

Lucy Howard (LH) – South Downs National Park Authority (SDNPA)

Katharine Stuart (KSt) – South Downs National Park Authority

Hannah Gooden (HG) – Sevenoaks District Council

Tondra Thom (TT) – Lewes and Eastbourne Councils

Roger Comerford (RC) – Tandridge District Council

Guy Parfect (GP) – West Sussex County Council

Sharon Evans (SE) – Tunbridge Wells Borough Council (TWBC)

Michael Hancock?? (??) – Tunbridge Wells Borough Council (TWBC)

Apologies: Nigel Hannam (WDC), Marina Brigginshaw (WDC), Ellen Reith (ESCC), Edward Sheath (ESCC), David Scully (TWBC), David Marlow (Rother District Council)

AGENDA ITEM	ACTION
1. Minutes and actions from last meeting (LH) All the actions arising from the meeting on 13th October had been actioned. LH questioned why WDC had redacted key parts of their Ashdown Forest SAC Air Quality Monitoring & Modelling report. KSh confirmed that the redaction had been put in place to disguise the exact locations of the monitoring stations due to previous problems with vandalism, theft and sabotage. KSh confirmed that there was an exclusion under EIR regs to protect the ongoing study under public interest. LH confirmed that it was not possible for others to plug the information into their models without exact locations and again the unredacted information was requested by those using the AECOM model. KSh refused to share the data on the grounds detailed above. TT stressed the need to understand the abnormally high NOx figures in the WDC study. TT suggested we seek advice on how the data could be shared with other authorities without being subject to EIR requests and asked if WDC would consider any potential solutions to data sharing put forward by the group. KSh agreed WDC could consider data sharing proposals put forward. LH also requested WDC provided year 1 and 2 measurements separately. It was noted that NE had seen an early draft of the Air Quality and Ecology Monitoring Report . There was a brief discussion on the risk register.	• KSh to send link to years 1and 2 monitoring data • All to investigate sharing of information • EP to send risk register for SoCG

RC noted that TDC were in the process of appointing Aecom to undertake traffic, air and ecological modelling, but the redactions in place meant it would be difficult to utilise the WDC data.	
2. Introductions and reasons for the meeting EP explained that the role of PAS was to provide skeletal but not detailed drafting of the SoCG. The SoCG was a mechanism for demonstrating Duty to Cooperate. The SoCG will not go into technical detail.	
3. Roles and responsibilities for the SoCG LH confirmed that the SDNPA will draft the SoCG.	
4. Geographical scope of the SoCG There was a discussion on the initial geographic approach relating to the 7km zone of influence for recreational disturbance for the SPA and then modified by journeys to work. It was noted that the 7km zone is not directly relevant to the SAC. However, due to the complexity of this work and the need to make progress it was decided by all that instead of 'geographic scope' the SoCG would refer to the 'geographical area defined by the membership of the Ashdown Forest Working Group.' The following authorities were defined as members and it was agreed to contact Crawley and Brighton & Hove again about membership. • South Downs National Park Authority • Lewes District Council • Wealden District Council • Eastbourne Borough Council • Rother District Council • Tunbridge Wells Borough Council • Sevenoaks District Council • Tandridge District Council • Mid Sussex District Council • Crawley Borough Council • Brighton & Hove Council • East Sussex County Council • West Sussex County Council It was discussed that the geographic areas having a bearing on Ashdown Forest air quality may in practice bisect individual lpa boundaries. KSh confirmed that WDC had received their transport model for Ashdown Forest this week. RC raised the option of widening the scope of the SoCG to encompass all Ashdown Forest issues (i.e. also including issues related to the SPA and recreational impacts). The Group decided to continue with current scope focusing solely on air quality.	• JH to contact Crawley BC about membership • LH to contact B&H CC about membership of group
5. Other elements of scope **(a) Local Plan Housing numbers**	• KSt to re-circulate Housing Figures

Most of this table had already been completed. Awaiting figures from Crawley, TWBC, T&MBC and Brighton & Hove if they choose to join the group. Figures for those districts partly covered by the National Park needed to be disaggregated for inside/outside the National Park to prevent double counting. The figures would then be agreed on 23rd November and frozen for a set period yet to be determined.	table for all to complete by 20-11-17 • KSt to disaggregate housing figures in regard to the National Park and circulate by 20-11-17
5. Other elements of scope **(b) Methodology assumption headlines** It was agreed that there are 3 groups of assumptions each of which was discussed as follows: **(i) Transport modelling** Three different models had been used by the group namely West Sussex model used by MSDC, the Wealden model used by WDC and the AECOM model used by everyone else. The key differences between them were: • What the model deals with e.g. residential, employment, visitors • Background future forecasting e.g. 2009/2014 • Input e.g. geographical unit such as Census super output area • Origin/destination zones • Outputs e.g. AADT • Roads • Other SACs • Model structure e.g. growth factors and base year • Input data e.g. Census and TRICs • Use of OAN or plan-based figures for neighbouring lpas 'in-combination' housing number. GP to draft the headings of a table and circulate for all to complete. **(ii) Air quality calculations** The principles of the following topics were discussed: • Chemicals monitored • Forecasting assumptions for methodology Circulation of another table was discussed. It was agreed however, that all parties would look into their own air quality calculations methodology for a discussion at the workshop. **(iii) Ecological interpretation** It was decided that there should be a discussion but not a table on ecological interpretation focusing on the following: • 1% contribution process • Key HRA regs arguments	• GP to draft and circulate table of transport modelling by 15-11-17 and all to complete and return to KSt by 20-11-17

There was discussion about mitigation and whether it should be addressed in the SoCG. It was agreed that it shouldn't but should be discussed by the group in the New Year once the SoCG was finalised. RC requested that consideration of potential mitigation and compensation be included in the scope of the SoCG. TT noted that evidence does not exist to justify the need for compensation. The consensus was to not include this on the basis that it is a later HRA stage and would not necessarily be required. RC felt it should be covered as there is a risk that it may be required and we needed to be prepared for this eventuality. Alternatively, RC requested that the SoCG could at least include a statement to the effect that the Group agreed to work in partnership on mitigation/compensation in the event of such measures proving necessary. It was agreed that the group would look at Strategic Nitrogen Action Plans (SNAP) after the completion of the SoCG.	
6. Local Plan timetables Table to be completed by all.	• All to complete table and return to KSt by 20-11-17
7. Sign off arrangements and timelines for SoCG Table to be completed by all.	• All to complete table and return to KSt by 20-11-17
8. Planning for our workshop on 23rd November The workshop is expected to last approximately 6 hours. It was agreed that by the end of the workshop we needed enough information to draft the SoCG. NE will only be able to attend part of the workshop and it was thought most useful if this was the second half. The agenda would follow the same broad headings of today's meeting. There was a discussion about whether expert consultants should be allowed to attend the workshop. Their role would be to draw out the differences between the different assumptions but not the credence of the different models. EP to ask PAS whether James Riley's (SDNP, TWBC and LDC's HRA Consultant) attendance would be appropriate bearing in mind that WDC and MSDC Consultants are unlikely to be able to attend. EP/PAS to report back to the group with recommendations. All to ascertain availability of consultants for workshop. It was clarified that even if consultants were unable to attend, there would be an opportunity for the draft SoCG to be circulated to them post-workshop.	• LH to circulate draft agenda 20-11-17 • EP to confirm with group whether it is appropriate or not for a Consultant(s) to attend next SoCC workshop. • All to confirm whether consultant(s) are available, as appropriate.
9. AOB None	

Post meeting notes:

- Tonbridge & Malling Borough Council have requested not to appear in the Statement of Common Ground on the advice given by Natural England on 13th October.
- The membership of East and West Sussex County Councils is to be discussed at the next meeting of the group.

NOTES OF MEETING ASHDOWN FOREST SAC WORKSHOP 10:00 AM, 23rd NOVEMBER 2017
MID SUSSEX DISTRICT COUNCIL, HAYWARDS HEATH

Attendees:

Edward Purnell (EP) – Wood on behalf of Planning Advisory Service (PAS)

Marian Ashdown (MA) – Natural England (NE)

Kelly Sharp (KSh) – Wealden District Council (WDC)

Marina Brigginshaw (MB) – Wealden District Council

Jennifer Hollingum (JH) – Mid Sussex District Council (MSDC)

Lucy Howard (LH) – South Downs National Park Authority (SDNPA)

Katharine Stuart (KSt) – South Downs National Park Authority

Hannah Gooden (HG) – Sevenoaks District Council

Tondra Thom (TT) – Lewes and Eastbourne Councils

Roger Comerford (RC) – Tandridge District Council

Guy Parfect (GP) – West Sussex County Council

Sharon Evans (SE) – Tunbridge Wells Borough Council (TWBC)

David Scully (DS) – Tunbridge Wells Borough Council

Michael Hammacott (MH) – Tunbridge Wells Borough Council (TWBC)

David Marlow (DM) – Rother District Council (RDC)

Jenny Knowles (JK) – Tonbridge and Malling Borough Council (T&MBC)

Apologies: Nigel Hannam (WDC), Ellen Reith (ESCC), Pat Randall (ESCC), Edward Sheath (ESCC), Tom Nutt (Crawley)

AGENDA ITEM	ACTION
1. Introductions and minutes from last meeting (LH)	• LH to request data from WDC

• Group went through the minutes and then actions from the previous meeting, discussing the amendments received by email prior to the meeting. A number of changes to the minutes were discussed and the final minutes were agreed by all. Further actions were also identified. • LH asked for a link to the separate Year 1 and Year 2 monitoring data to be circulated. KSh advised that only Year 1 was published in a standalone report and suggested we set out exactly what we are seeking in a question to be sent direct. • TT asked again for the redacted air quality monitoring locations, suggesting that the data could be shared consultant to consultant which would be exempt for EIR. KSh advised that when consultants hold information used for a public body, they are in effect equivalent to 'an arm' of the authority and would be subject to the same EIR risks. • WDC advised that they have instructed counsel on a number of Ashdown Forest/HRA related issues, including the request for the redacted air quality monitoring locations and the forthcoming SCG. • Feedback from Crawley BC was that they did want to join the group but could not attend today's meeting. • Feedback from Brighton & Hove CC was that they did not currently want to join the group but would like to be kept up to date on progress. • EP reiterated the role of PAS as a facilitator to support the preparation of the SoCG which will: o assist in demonstrating that parties have co-operated; o draw out any differences and identify what may need to be done to resolve those differences o be concise and non-technical	in line with email from AECOM. • KSt to make agreed changes to minutes and circulate finalised version.
2. Sign off arrangements (table) (KSt) • KSt outlined the table and noted that there were unlikely to be showstoppers for signoff by March. • RDC noted that they have provided two scenarios for sign off options depending on the content of the SoCG. • Queries arose regarding which authorities would be signatories. These are addressed under item 4 of the agenda.	• All to advise Chair (LH) of any changes in expected sign off process.
3. Local Plan housing numbers (table) (KSt) It was discussed whether housing numbers could be agreed, how long they might be frozen for and how these numbers should be used in modelling. It was agreed: • The position at the last meeting was confirmed: any agreement around housing numbers would be just applicable to future modelling runs rather than retrospectively re-running models.	• KSt, in due course, to update table with disaggregated housing figures for the National Park following discussion with

• Numbers would always be changing and any agreement would be a snapshot of the numbers as they stand upon signing the SoCG.
• Housing numbers would be a standing item on the agenda for the Working Group going forward to update at key stages in plan making.
• Each LPA to confirm housing numbers with individual authorities before running models.
• A general principle in the agreement of housing numbers as follows:
  o If a LP is less than 5 years old use the adopted figure
  o If an emerging LP is nearing pre-submission and the LPA is confident then use the emerging figure
  o If the adopted LP is over 5 years old and an emerging plan has not progressed use the OAN/standard methodology (once confirmed by CLG) unless otherwise evidenced.
The group went through the table and indicated the preferred current housing figure to use.
	respective authorities.
	• KSt to compile housing table for the SoCG with the housing figures to use for each authority highlighted in bold
	• LH to add housing numbers as a standing item to future agendas.

4. Geographical area defined by the membership of the Working Group (KSt)
It was agreed at the previous SoCG meeting that signatories of the SoCG would be self-selecting and broadly make up the membership of the Working Group.
 	
At this workshop it was agreed:
• Tonbridge and Malling Borough Council would be removed from the signatories list on the basis of advice from Natural England that they did not foresee TMBC being involved in the SoCG. T&MBC would like to continue to be part of the group to observe.
• Add Crawley BC
• Remove Brighton and Hove CC
• Rother included on a precautionary basis
• West and East Sussex County Councils to be added
• Surrey CC and Kent CC would be added to the circulation list for information, but would not be signatories.
• Membership of the group and signatories may change based on emerging evidence
• The list of signatories was confirmed as:
  o South Downs National Park Authority
  o Lewes District Council
  o Wealden District Council
  o Eastbourne Borough Council
  o Rother District Council
  o Tunbridge Wells Borough Council
	• KSt to contact Crawley to add their data to the tables.

○ Sevenoaks District Council ○ Tandridge District Council ○ Mid Sussex District Council ○ Crawley Borough Council ○ East Sussex County Council ○ West Sussex County Council	
5. Transport modelling (table) (KSt & GP) • It was agreed that the table did not cover all elements required. It was agreed: ○ GP to rework the table and recirculate to the Working Group, providing guidance on how to complete the table. The table will be circulated on Monday 27th November. ○ Authorities will complete the table and return to GP by Monday 4th December. ○ GP will analyse the table and identify commonalities, minor differences and major differences. These will be colour coded. ○ GP will circulate this analysis for comment on Monday 11th December. ○ The table will need to be finalised by the end of December, ○ GP to provide narrative to the table to go into SOCG • It was agreed that the table would provide a snapshot of some of the main differences/similarities and to get the full methodology for looking properly at the models. • The possibility of agreeing common elements of transport modelling for future work was discussed but not agreed at this time. • This topic would just deal with transport modelling drawing out the commonalities, major differences and minor differences. • The use of models and proportionality was raised by TT with regard to the differing scale of additional AADT. Matter discussed further under agenda item 6.	• GP will rework the table and circulate to the Working Group on Monday 27th November, • Authorities will complete the table and return to GP by 4th December. • GP will undertake analysis of the table and will circulate on Monday 11th December.
10. Risk Register (EP) An example risk register was circulated by PAS for consideration. The Working Group agreed that it didn't add value to the SoCG process and that the risk register related more to the preparation of individual local plans. It was agreed that the Working Group may wish to revisit the idea of a risk register once the SoCG is drafted.	
6. Proportionality (TT)	• WDC to provide the reasons and explanation for

TT introduced this item- there is no universal standard on proportionality and the issue relates to what is the 'appropriate' level of assessment required for LPs? Where effects are demonstrably small can the level of assessment be justifiably less complex than WDC's bespoke approach? TT queried what justification there is for objections from WDC to accepted industry standard methodology being used by those authorities where their evidenced contribution to any potential impact is proportionally, substantially smaller. The inference from the Habitats Regulations and government guidance is that the assessment should be proportionate to the likely scale of impact. LH pointed out that the NPPF states that Local Plan evidence should be proportionate. Objections to industry standard robustly carried out assessments may unnecessarily frustrate plan-making therefore TT posed agreement for the accepted industry standard methodology. Initial responses: • SDNPA: agree • TWBC: agree • LDC: agree • EBC: agree • WDC: does not agree and will not move on the standard methodology on the basis of work already undertaken. WDC contend that the standard methodology does not meet the requirements of the Ashdown Forest context. This work was undertaken in response to the Wealden Core Strategy EiP. WDC have used the Mott Macdonald methodology as amended. • NE: agree with TT with regard to proportionality. Polluter pays. NE not objecting to the use of the standard methodology. • WDC say that the APIS calculation are slightly wrong with regard to deposition. WDC use a finer grained 2m² rather than 5km². • TWBC: standard methodology and result are not wrong, WDC grid squares just more refined. Justifiable to use best practice unless a clear reason not to do so. • TWBC asked WDC to confirm the reasons for taking such a pessimistic approach within their methodology and the absence of any allowance of background improvements to air quality. WDC replied that this approach was justified by the application of the precautionary principle. • WDC advise they will get legal advice regarding proportionality and will run their data through the standard methodology and make available. WDC advise their air quality experts will be busy until Christmas. Rother and Tandridge reserved their position. All others generally agree to use standard methodology except WDC. Ask that WDC	methodology deviation to go into the SoCG.

provide the reasons and explanation for deviation to go into the SoCG.	
7. Air quality calculations The following points were briefly discussed: • WDC also assess non-standard ammonia and the 24-hr NOx mean. • MA – new cars don't emit as much ammonia – specific type of catalytic converter • WDC air quality report recognised both positive and negative limitations • WDC – ammonia and NOx interact in the atmosphere and this impacts N deposition. • NE will be signatory on air quality/ecological interpretation elements but not on housing numbers or traffic modelling parts of the SoCG • It was agreed that the standard responses on all the items on the SoCG were Agree, Disagree, or No position. It was agreed that a table would be helpful for this. KSt to prepare a table based around key headings below and circulate on Monday 27th November. Working group to provide their responses by 11th December. • Chemicals monitored and assessed in forecasting • Conversion ratios from NOx to N • Background improvement assumptions • Rate of dispersal from the centre line of the road up to 200m • Type of habitat included in the assessment – e.g. woodland in roadside vegetation. There may be other aspects of the methodology others may wish to note.	• KSt to prepare a table based around key headings below and circulate on Monday 27th November. Working group to provide their responses by 11th December. • KSt will send to AECOM for help in completing on behalf of all authorities using the AECOM model approach/standard methodology.
8. Ecological interpretation Three items were put forward for discussion: (1) 1% process contribution (2) Additional harm above the critical load/level (3) Type of habitat included in the assessment – e.g. woodland in roadside vegetation. (1) NE advise: 1% or more process contribution triggers Appropriate Assessment as there is considered to be a likely significant effect. The threshold is not arbitrary and is based on robust science – process contributions below 1% cannot be properly modelled and changes in air quality cannot be seen in the ecology at these levels. Above 1% does not mean an adverse impact but should check through AA process.	• KSt to add topic into the SoCG as something that may need to be addressed in the future.

All use or are likely to use except WDC who have not drawn a conclusions on this matter but will consider. (2) NE: look at sensitivity of impact. Dose response is curvilinear. Key thing is loss of species richness in heathland. (3) Covered in agenda item above. Overall, NE advise that it is too soon for the authorities in the Working Group to consider ecological interpretation as there is currently no evidence (for example through AA) published which says that such measures are required. The Mid Sussex and AECOM HRA screening for LSE work touches on ecological interpretation but this is beyond requirement for LSE screening. All agreed this was a topic that would go into the SoCG but as something that may need to be addressed in the future.	
9. Site Nitrogen Action Plan (SNAP) Phrasing and nature of the approach was discussed. All agreed that paragraph 4.2.8 of the LDC/SDNPA HRA addendum will be included in the draft SoCG for consideration. Noted that a SNAP is not mitigation or compensation as there is not enough measurable certainly of the results. But may include some elements of mitigation. One of the 'soft measures' to address background levels from a range of sources. NE would lead on a SNAP working with other partners.	• KSt to include paragraph 4.2.8 of the LDC/SDNPA HRA in the draft SoCG for consideration
10. Actions and timetable going forward • LH read out list of actions to the Working Group • When comment on or signing the SoCG as 'disagree' it is incumbent upon that party to say why, but be concise. • Noted that CIEEM are undertaking an internal consultation for members only on new air quality methodology guidance. • KSh recommended a style of table for setting out comments on the draft SoCG – KSh to email to LH/KSt • Agreed to meet in mid-January to discuss the draft SoCG	• KSh recommended a style of table for setting out comments on the draft SoCG – KSh to email to LH/KSt • LH/KSt to circulate a draft SoCG by mid-December for the group to review. • LH/JH to arrange meeting in mid-January.

Ashdown Forest SAC Statement of Common Ground Workshop

10:00 am Thursday 18 January 2018

Mid Sussex District Council Offices, Haywards Heath

PLEASE NOTE THESE MEETING NOTES ARE DRAFT

Attendees:

Edward Purnell (EP)– on behalf of the Planning Advisory Service (PAS)

Lucy Howard (LH) – South Downs National Park Authority (SDNPA)

Kate Stuart (KSt) - South Downs National Park Authority (SDNPA)

Jennifer Hollingum (JH) - Mid Sussex District Council (MSDC)

Marian Ashdown (MA) – Natural England (NE)

Marina Brigginshaw (MB) – Wealden District Council (WDC)

Kelly Sharp (KSh) – Wealden District Council (WDC)

Tondra Thom (TT) – Lewes and Eastbourne Councils (LDC)

Aiden Thatcher (AT) – Lewes and Eastbourne Councils (LDC)

David Scully (DS) – Tunbridge Wells Borough Council (TWBC)

Sharon Evans (SE) - Tunbridge Wells Borough Council (TWBC)

Edward Sheath (ES) – East Sussex County Council (ESCC)

Roger Comerford (RC) – Tandridge District Council (TDC)

Guy Parfect (GP) – West Sussex County Council (WSCC)

David Marlow (DM) – Rother District Council (RDC)

Tom Nutt (TN) – Crawley District Council (CDC)

Helen French (HF) – Sevenoaks District Council (SDC)

Mark McLaughlin (MM) – Horsham District Council (HDC)

Agenda Item	Actions
1. Introductions and reasons for meeting: • EP commends all for getting to this point in process and said the SoCG was a clear demonstration of the group's efforts to meet the Duty to Cooperate. • Advises that extra level of detail is required for arguments agreeing as well as disagreeing key matters. • The SoCG is intended for a Planning Inspector to pick up and understand the issues.	None
2. Minutes from last meeting • Proposed amendments from TWBC agreed. • All actions identified had been actioned other that 'WDC to provide the reasons and explanation for methodology deviation.'	LH/MB/KS to follow up deviation from standard methodology

3. Focused discussion on the following proposed changes to the SoCG	(a.) Summary of the High Court judgement, pages 4-5 (Tandridge District Council). Tandridge District Council suggest in their comments that this summary should be removed. • Agree to delete majority of this section, retaining paragraph 1.8	• KS to make changes to the draft SoCG as agreed in the meeting and recirculate on approximately 26th January – members of the group to then feed back. • MA will let the group know a rough date when internal guidance may be shared with LPAs. • MA to provide some revised wording for 'Types of habitat to be included in the assessment' section.
	(b.) The use of agreed housing numbers in future model reruns, page 6, paragraph 2.3 (Wealden District Council). The text currently says that the agreed numbers would not involve retrospectively re-running models. Wealden District Council propose to add 'for adopted local plans'. • General disagreement with the proposed change from WDC. KS to add WDC disagree to the relevant table and WDC to provide reasons when next draft circulated.	
	(c.) Geographical coverage for transport modelling, pages 6-7 • NE noted that it has been asked if internal guidance may be shared with LPAs in due course and MA will let the group know a rough date when available. (i.) Lewes District Council comment that this section should be deleted as the geographical coverage for in combination is a matter for each local authority to justify. (Lewes District Council) • Agreed that geographical coverage within modelling work should be determined by each LPA and the following text reflecting this is to replace current wording in this section. 'It has been agreed that it is a matter for each LPA to determine the geographical coverage of their traffic modelling.' Table to be deleted. (ii.) Wealden District Council comment that modelling should include, but not be limited to the proposals from the authorities listed (Wealden District Council). • Agreed that this item no longer needed to be discussed as superseded by agreed changes above.	
	(d.) Roads to be included in modelling of Ashdown Forest, page 7 (West Sussex County Council) West Sussex County Council propose additional wording regarding modelling of B roads and minor roads. • Change agreed	
	(e.) Types of habitat to be included in the assessment, page 11 (Natural England) Natural England comment that they disagree with the approach set out in the SoCG. • Agreed that MA would provide some amended text and KSt to remove from 'not agree' column.	
	(f.) Precautionary principle, page 14 (Wealden District Council). Wealden District Council propose additional wording including the phrase *guarantee* no reasonable doubt. • MA disagrees with WDC's wording but MB said that it was wording from their barrister	
	General item 3 comments:	

	• Every signatory to give their position in each table • Additional column titled 'reserve judgement' to be added • Space added for explanations on each position	
4. Letters of objection to various planning applications by Wealden DC • MB outlines the broad content of the letter and advises the letter is authored by the development management part of WDC. The letters are broadly the same with the last part of the letter tailored to each authority. • Purpose of the letters was to raise the need to undertake HRA • Tandridge District Council has received 11 objections, 3 of which relate to sites North of the M25 • Separate meeting is offered by WDC • The problem of separate letters coming from the policy and DM parts of WDC is raised and noted. Group say that a joint policy and DM response from WDC would be helpful. • Issue raised by affected LPAs that these letters have come forward with no discussion/prior warning and this has caused consternation amongst members and officers. • Some of the queries raised include: o How will WDC pursue the letter? o Why have these applications been chosen to receive the letter? Criteria for selecting applications which would receive the letter. o Are HRAs being objected to? o Clarification on the differences of the final paragraphs of each letter o Clarification of the approach with adopted and emerging plans.		• MB to take questions from the group and discuss with Nigel Hannam • WDC will provide clarification to the group's questions by the 26th January in the form of a letter or statement • WDC to provide suggested dates for a meeting in early Feb to discuss the planning application objection letters.
5. The timetable for the way forward with the SCG • Recognise that there is not a lot of time before the SoCG is needed in mid-March. Dates were discussed and agreed. • Wording of section 3 'actions going forward' was discussed. It was agreed that it is important for the group to determine a way forward which all can sign up to. KS to rework this section to reflect discussion.		• Version 1 to circulate on approx. 26th Jan for people to state their position and provide explanations • Version 2 circulated approximately 9th Feb for final review and minor tweaks to position • Signatory version circulated approximately 16th Feb to be signed off by all by mid-March. • KS to reword section 3 to reflect discussion
6. AOB • Mitigation discussed as raised by RC:		• KS to make changes as agreed

○ Agreed that phrasing of 'mitigation/compensation' should be changed on the basis that these two are very different. ○ Discussed SNAP (and associated mitigation table) and agreed that it should be reflected in actions going forward • Appendix 5 transport modelling table raised by GP. Agreed that a table with less detail would be more appropriate, focusing on GP analysis.	• GP to provide KS with revised Appendix 5 transport modelling table

Appendix 4 – Housing numbers

This table sets out the various housing numbers approaches for each local planning authority. The numbers in **bold** are those which have been agreed by the Ashdown Forest Working Group at the time of drafting this Statement of Common Ground following the methodology outlined in section 2 of the Statement.

Authority Name	**Adopted Local Plan housing number**	**OAN**	**DCLG new methodology**	**Numbers used for own LP (and in any modelling work undertaken so far if different)**	**Numbers used for other LPAs in modelling work**	**HMA figure**
Crawley Borough Council	5,100 dwellings total **340** dwellings per annum annualised average	675 dwellings per annum	476 dwellings per annum			Northern West Sussex HMA: as for Mid Sussex District Council below
East Sussex County Council	n/a	n/a	n/a	n/a	n/a	n/a
Eastbourne Borough Council	5,022 by 2027 240 per annum	**400**	336 (capped)	No modelling undertaken to date	No modelling undertaken to date	Eastbourne & South Wealden HMA number TBD
Lewes District Council	6,900 **345** per annum	520	483	345 LP plus an additional +50% allowance for Newick	Tunbridge Wells – OAN 648 per annum Sevenoaks – OAN 620 per annum Wealden – OAN 832 per annum Mid Sussex – inspector figure 1,026 per annum	520 (higher end) Lewes District (including the Park) within the Coastal West Sussex HMA

Authority Name	**Adopted Local Plan housing number**	**OAN**	**DCLG new methodology**	**Numbers used for own LP (and in any modelling work undertaken so far if different)**	**Numbers used for other LPAs in modelling work**	**HMA figure**
					Tandridge – OAN 470 per annum	
Mid Sussex District Council	The emerging Mid Sussex District Plan 2014-2031 sets a minimum housing provision figure of 16,390 homes. For the purposes of calculating the five-year housing land supply a 'stepped trajectory' will be applied through the calculation of a 5-year rolling average. The annual provision in this stepped trajectory is **876 dwellings per annum for years 2014/15 until 2023/24 and thereafter, from 1st April 2024, 1,090 dwellings per annum until 2030/31,** subject to future HRA on further allocated sites, to meet unmet needs of neighbouring authorities.	14,892 (an average of 876 dwellings per annum) for 2014-2031	1,016 dwellings per annum for 2016-2026	See second column	Growth assumptions for surrounding authorities used in the transport model: Crawley – 6,908 Wealden – 8,988 Lewes – 6,032 Brighton & Hove – 14,301 Horsham – 16,701 Tandridge – 6,395	Northern West Sussex HMA Crawley – 675 Horsham – 650 Mid Sussex – 876 = 2,201 dwellings per annum
Rother District Council	335 net dwellings pa	363 pa	469 pa (capped) 737 pa (uncapped)	n/a	n/a	Hastings and Rother HMA (as at 2014): 767 pa

Authority Name	**Adopted Local Plan housing number**	**OAN**	**DCLG new methodology**	**Numbers used for own LP (and in any modelling work undertaken so far if different)**	**Numbers used for other LPAs in modelling work**	**HMA figure**
Sevenoaks District Council	165 / yr 3,300 over 20 year (2006-2026)	12,400 (2015-35) 620 pa	698pa	**620** / 698	n/a	Tonbridge & Malling Tunbridge Wells
South Downs National Park Authority	There are several figures currently operating across the National Park but not one park-wide figure	447	Not applicable	**250**	Tunbridge Wells – OAN 648 per annum Sevenoaks – OAN 620 per annum Wealden – OAN 832 per annum Mid Sussex – inspector figure 1,026 per annum Tandridge – OAN 470 per annum	Coastal Sussex HMA : 274 Eastbourne and Wealden HMA: 14 Northern West Sussex HMA: 14 Central Hants : 144
Tandridge District Council	125 dpa	**470**	645	TBC	470	470
Tunbridge Wells Borough Council	The adopted Core Strategy figure is 300 per anum	**648** (SHMA 2015)	692	648	As above	Tunbridge Wells Borough is considered to be in a HMA which includes Sevenoaks, Tonbridge and Tunbridge Wells and extends to include Crowborough, Hawkhurst and Heathfield.

Authority Name	**Adopted Local Plan housing number**	**OAN**	**DCLG new methodology**	**Numbers used for own LP (and in any modelling work undertaken so far if different)**	**Numbers used for other LPAs in modelling work**	**HMA figure**
Wealden District Council	450 dwellings per annum or 9,600 in total 2008 - 2027	950 DPA	1247 (check)	**11,456** (total) for Ashdown Forest modelling 11,724 for Lewes Downs and Pevensey Levels (revised figures post March 2017 Draft WLP).	2014 tempro data	Not yet determined.
West Sussex County Council	n/a	n/a	n/a	n/a	n/a	n/a

Appendix 5 - Ashdown Forest Transport Model Analysis

This table sets out the key elements of the transport modelling undertaken as part of HRA work for the respective local planning authorities. It also sets out some analysis prepared by West Sussex County Council on the major and minor differences and commonalities of the approaches taken.

Key	Model Base Year	Geographical Coverage	Road Network in Forest	Origin to Destination Demand Data Sources	Data Types for Base Year Validation	Origin to Destination Zone Definition	Forecasting Years	Trip Generation Methodology	Demand Changes Assessed in Study	Forecasting Background Growth	Time Periods Directly Modelled	Modelled Responses to Congestion	Other European Designated Sites Assessed?
Assessment of level of difference between Models:													
Colour Coding													
Comments	Two models are grown from older bases, whilst other models are all from 2014	Whilst all models include the Ashdown Forest SPA, there is wide variation in the choice and extent of which other areas are included, reflecting the location of the client authorities	All models include all the A class roads. Two models have represented B class roads and one minor road, although the assignment did not use them. One model also represents a number of Class C roads	There is a split between those models which use roadside interview data, - which captures all journey purposes but is based on a sample which requires infilling with data such as NTEM and NTS – and those which use 2011 census journey to work which captures only one journey purpose but with universal spatial coverage in UK and very high response rate	All models use continuous automatic traffic counters as a primary source of volumetric data. The extent to which manually observed data for junction turning movements or links is used varies and only two models have reported journey time observations.	All model zoning systems are based on Census areas, but the level of aggregation between models and and uniformity across parts of individual models is varied.	The headline forecasting year has a relatively narrow range from 2028 to 2033 (five years) No models have yet assessed intermediate forecast years for plan phasing. One model with an older base year has also used a present day forecast for comparison.	Universal use of TRICS for site specific trip generation. There will be some minor variations in use of site selection parameters where information is available.	All models assessed planned housing and employment. There is some difference in approach to smaller sites which may not vary in overall quantum from unplanned development trends. Some models concentrate mainly on individually modelled strategic sites with others treating all sites included in a Local Plan together by adjusting NTEM totals.	All models use TEMPro/NTEM with the version used reflecting the time when the model forecasting was started. There is some difference in approach to how TEMPro/NTEM is applied and the definition of what is background, with some models treating small non-strategic allocations or planned dispersed development along with background, whilst others treating all sites included in Local Plan together.	There is a split between those models which assess AADT traffic directly and those which simulate hourly flows, with AADT forecasts being calculated by factoring derived from observations.	All but one model allow re-routing. One model uses fixed routings; although there can be two alternative routings between O-D pairs, this does not vary according to travel times/costs. Two models allow destination choice, with only one model allowing mode choice.	This varies greatly according to the geographical extent of the model and study area, in particular the location of the client planning authority in relation to other designated sites.

Appendix 6 - Ashdown Forest Air Quality Calculations Methodology Information

This table sets out the key elements of the air quality calculations undertaken as part of HRA work for the respective local planning authorities.

Authority & consultant	**Chemicals monitored and assessed in forecasting**	**Conversion ratios from NOx to N**	**Background improvement assumptions**	**Rate of dispersal from the centre line of the road up to 200m**	**Type of habitat included in the assessment – e.g. woodland in roadside vegetation.**
South Downs National Park Authority, Lewes District Council, Tunbridge Wells Brough Council, and likely Tandridge District Council - AECOM	NOx, N deposition, Acid Deposition	NOx to NO_2 conversion calculated using Defra's NOx to NO_2 calculator. Then NO_2 multiplied by 0.1 for N deposition as per DMRB guidance.	For N deposition -2% applied up to 2023 (equivalent of 1% per year for plan period to 2030). Improvements in background concentrations and emission rates assumed following Defra assumed improvements up to 2023.	Modelled using dispersion model ADMS-Roads, written by CERC.	A precautionary assumption was made that pristine heathland (the SAC feature) was present, or could be present in the future, at any point on the modelled transects irrespective of existing habitat at that location. Therefore heathland was the only modelled habitat.