



# High Weald AONB Management Plan 2019-24

## Consultation Statement

Produced November 2018



Public Understanding & Enjoyment workshop  
Image ©Matt Pitts

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# 1. Introduction

The High Weald AONB Management Plan is subject to a 5 year review cycle and work to review the Plan began in March 2017. A crucial part of the review process is consultation and engagement, and the decision was taken to start this at an early stage to ensure the revised draft incorporated as many different peoples' views from the outset as possible. The engagement and consultation process may be divided into three broad parts:

1. Expert engagement
2. Public engagement
3. Formal public consultation

This report provides an overview of the entire consultation and engagement process, as well as the method used to complete each stage. The table below shows how the consultation and engagement elements of the review (highlighted in green) fit into the wider Management Plan review process.

## High Weald AONB Management Plan Review Timetable

|                       |   |
|-----------------------|---|
| <b>Dec 2016</b>       | Scoping review                                      |
| <b>Feb 2017</b>       | Issues & principles report presented to OSG         |
| <b>Mar 2017</b>       | Scope of review approved by MB & JAC                |
| <b>Apr 2017</b>       | Statutory consultees alerted                        |
| <b>May 2017</b>       | Expert engagement                                   |
| <b>July 2017</b>      | Public engagement                                   |
| <b>July 2017</b>      | Performance and Condition Monitoring                |
| <b>July 2017</b>      | Plan redrafting                                     |
| <b>Oct 2017</b>       | Progress report to JAC                              |
| <b>Jan 2018</b>       | Consultation draft produced                         |
| <b>Mar 2018</b>       | JAC agree Consultation Draft                        |
| <b>June-July 2018</b> | Formal public consultation                          |
| <b>Aug 2018</b>       | Amendments and modifications                        |
| <b>Sep-Oct 2018</b>   | Final draft agreed by OSG & MB                      |
| <b>Nov 2018</b>       | Final draft agreed by Joint Advisory Committee      |
| <b>Dec-Mar 2018</b>   | Local Authority committee processes                 |
| <b>Mar 2019</b>       | Plan sent to Secretary of State for formal adoption |
| <b>Apr 2019</b>       | Adoption  |
| <b>May 2019</b>       | Dissemination and distribution                      |

The following sections outline the methods used for engagement and consultation in the expert engagement workshops, the public engagement online questionnaire and the formal public consultation. The report also summarises the outputs from these methods and explains how they have informed the new Management Plan 2019-2024.



As well as informing the redrafting of the revised Plan, the information gathered at through the expert engagement process also fed into the Performance and Condition Monitoring reports – which help measure the effectiveness of the last plan and thereby highlight areas that require improvement in the next Plan.

### **3. Public Engagement**

In summer 2017 a public survey was launched to explore what aspects of the High Weald the public find particularly beautiful and how they most like to enjoy the area. Questions on the public's values, perceptions of the biggest threats and desired improvements were posed and results were counted and analysed. The survey was distributed through a weblink via social media, email, e-news and through distribution via organisational stakeholders, including the area's local authorities.

A total of 294 people completed the survey. Of these 294, the largest proportion were aged between 45 - 64, however respondents did span all given age categories. Running themes were evident throughout the survey results and highlighted the enjoyment gained through just being within the landscape and the countryside and the sensory experiences – through sights, sounds and smells – that people valued most. Walking through the countryside was a key mechanism through which most people gain enjoyment, and public footpaths were the most used form of access. The threat of increased building developments and urban expansion was of great concern to the vast majority of people and restrictions on developments were the most popular way to improve and conserve the High Weald countryside. A full report of the survey results can be accessed on the [Management Plan Review](#) webpage.

The information gathered during this stage of the review was fed into the revised draft which was prepared for approval of the JAC and Management Board and subsequently made available for formal public consultation.

### **4. Work Undertaken Prior To Public Consultation**

Responses from the public and expert engagement stages of the review were generally supportive of the plan approach and provided valuable feedback and suggestions for changes, amendments and the future of the plan. Following their incorporation, an internal review of the plan was also undertaken and identified areas that needed change and more focus. This stage of the review included a complete Condition Monitoring Assessment and Performance Monitoring Assessment.

The results of the stakeholder engagement and internal review confirmed that the plan was still fit for purpose and that it was fundamentally sound. Amendments to the plan therefore concentrated on the indicators and actions and particular gaps identified during the review, as well as factual and technical updating of the text.

In addition, three statutory assessments were carried out to inform the content of the Management Plan. These were:

- A Strategic Environmental Assessment
- A Habitats Regulations Assessment Stage 1 (screening) report
- An Equalities Impact Assessment of the Management Plan

The Consultation Draft Management Plan and its supporting documents were approved by the Joint Advisory Committee on 28<sup>th</sup> March 2018 for public consultation.

## 5. Public Consultation

The consultation exercise was launched on 13<sup>th</sup> June 2018 and ran through to the 25<sup>th</sup> July. The following measures were taken to publicise the consultation:

- Individual letters were sent to all the local authority chief executives; all the parish councils; Natural England; the Environment Agency; Historic England; Highways England; the Forestry Commission; Heritage Lottery Fund; Southern Water; South East Water; and UK Power Networks.
- Printed copies of the Management Plan were sent to all the local authorities for placing on deposit in their offices and placed in public libraries and the Ashdown Forest Centre.
- The Management Plan and its supporting documents were made available on the High Weald AONB Partnership website.
- Paper copies of response forms were also made available at deposit points and an online version was on the website .
- The consultation was advertised via social media and the High Weald AONB e-news.

143 responses were received, 115 from individuals and 28 from organisations. 82% of the respondents 'strongly agreed' with the AONB Vision and 84% of the respondents 'strongly agreed' with the Statement of Significance. There were 34 comments on the overall Plan and 234 comments on the character components, with the highest numbers on the Geology and Settlement components. The comments and proposed actions as a result can be viewed on the [Management Plan Review](#) webpage.

## 6 Conclusion

The High Weald AONB Management Plan 2019-2024 has been subject to significant public and expert engagement, consultation and scrutiny. It has also been subject to statutory assessments designed to test its impact on the environment generally, European designated habitats and equalities. The outcome of the consultation and assessments have informed its content where appropriate and ensured that the Management Plan remains up to date and relevant to everyone who lives, works and spends their leisure time in the High Weald and provides good advice to those who seek to conserve and enhance the AONB.

**High Weald Management Plan 2019 - Public consultation statements and responses**

| <b>Topic</b>     | <b>Organisation or person</b> | <b>Detailed comments</b>   | <b>AONB Responses</b>  |
|------------------|-------------------------------|--|--|
| Overall comments | Wealden District Council      | Not all of the Aims and Actions are relevant to every public body but that is how the Plan reads at present. It would be beneficial to perhaps categorise these somehow to make it more explicit/clearer who has responsibility for what. The same issues apply concerning the Aims and Actions of all the Objectives under the topic areas, as it is unclear as to who should carry out what.   | The Management Plan is a strategic document.   |
| Overall comments |                               | We would favour an action on public bodies actively seeking and engaging in grant schemes aimed at helping protect and enhance biodiversity such as EU funded Stewardship schemes and its potential successor grant award scheme following Brexit. Such an action could sit within any of the chapter headings.<br>A proposed additional aim for public bodies could be; Protect, conserve and manage sites of local, national, and international conservation importance and work with others to ensure the long term conservation of sites through appropriate management by way of targets grant schemes such as Countryside Stewardship and its potential successor scheme following Brexit.         | Noted. Local authority and public body commitment in section 1 amended.  |
| Overall comments | Individual comment            | I notice the plan does not address the potential impact of oil / gas exploration which is likely to become an issue in the next 5 years.   | The Plan provides a set of criteria against which any new threat or issue can be addressed, recognising that not all future issues can be anticipated    |
| Overall comments | Individual comment            | the consultation and report focuses far too much on the discipline of archaeology and not also history which has a lot to offer- indeed there is a lot of recent work published!   | Noted. Additional action added to OQ4  |
| Overall comments | Individual comment            | Above all, let's try to make the minimum of detrimental changes to the AONB. Development must be minimal, affordable and targeted at locals. I am pleased that the authors of the Draft management Plan seem to appreciate just what a lovely area this is. Long may it stay that way  | Support welcomed   |
| Overall comments | Individual comment            | All very good but concerns re public access vs needs of wildlife and landowners/farmers needs and rights. Also would like to see more acknowledgement of extent of private ownership of the land and building in the High Weald. The opportunities that may become available for diversified, or non-agricultural businesses to support the cost of maintaining the landscape should not be underestimated. Affordable housing and business space similarly so. Fixed rate shared ownership housing should be encouraged as should the ability of private landlords to run their own affordable rented housing schemes. Sheltered / community housing like Five Villages could also be encouraged        | Noted. Private ownership of land added to introduction.  |
| Overall comments | Individual comment            | YES! The cloud of fracking is darkening our skies and shadowing our land. Can the High Weald do anything stronger to protest this in every way and disallowing it full stop? A large number of households were without water this winter because of the thaw after the Beast From the East. It is only when you are without something so vital that you realize just how vital it is. Fracking can pollute water systems. If you look at what they have done in New York State (they have banned fracking because the state has too dense a population to risk their water supplies), you would realize that should be done here too (our population density is MUCH higher than the state of New York!) | The Plan provides a set of criteria against which any new threat or issue can be addressed, recognising that not all future issues can be anticipated    |
| Overall comments | Woodland Trust                | General: would like to see some recognition of issues relating to woodlotting, and aim to increase co-operation between woodlot owners.  | Woodlotting did not reach the top 5 list of issues in our consultation but we recognise the importance of this issue. Landowner cooperation added to W2. |
| Overall comments | Hastings Borough Council      | Given the important role local authorities have in managing and protecting the High Weald and its habitats, we would suggest that the document state quite clearly the essential role local authorities have in protecting and managing sites of nature conservation importance in line with their statutory duty.   | Noted. Local authority and public body commitment in section 1 amended.  |
| Overall comments | Pembury Parish Council        | Pembury Parish Council believe that the AONB, and in particular around Pembury, is irreplaceable ancient woodland and every effort should be made to conserve and enhance it.  | Noted.   |

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| <b>Topic</b>     | <b>Organisation or person</b> | <b>Detailed comments</b>  | <b>AONB Responses</b>   |
|------------------|-------------------------------|---|---|
| Overall comments | Historic Environment Planning | Historic England's fully supports the Vision and objectives of the draft Management Plan and endorses those relating specifically to its areas of interest, in particular the historic character of the area, its heritage assets and settlement pattern and forms of the High Weald. We commend the approach taken to encapsulating these matters within the draft plan. Historic England would strongly advise that the relevant Councils' conservation staff are closely involved throughout the preparation of the Management Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment, in particular the how to set out a positive strategy for the conservation and enjoyment of the historic environment. These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment. | Support welcomed  |
| Overall comments | CPRE Sussex Countryside Trust | Therefore, our general suggestion is that the HWAONB should consider adopting Conservation Board status and to grow into the various additional activities that these other two leading AONBs have embraced. Given the size and importance of the area covered by the HWAONB we see no reason why you should not follow the example of these other AONBs.   | Conservation Board status has previously been rejected by the High Weald Joint Advisory Committee. The Government is currently conducting a review into protected landscapes and this matter will be revisited.   |
| Overall comments | CPRE Sussex Countryside Trust | For instance, the five main issues in that policy area are categorised but none of the policies proposed go to the heart of the problem of external development pressures on the finite land resource within the AONB. The policy proposals are particularly vague in this area. They simply fail to address the issue of the complexity of the area which comprises 11 (!) LPAs and 4 County Councils, stacked against the Government imposed pressure of a 5 YHLS target, where the weakest and most vulnerable authorities will always lose out.   | Noted. The AONB Management Plan is not a local plan.  |
| Overall comments | Individual comment            | I am disappointed that there is no mention of the pollution caused by planes landing at Gatwick Airport. Gatwick is by far the biggest polluter in the area. It seems pointless to designate an AONB and yet allow this huge level of pollution. Either planes should not overfly the AONB or a levy per landing should be charged.   | Clean air added to OQ4  |
| Overall comments | Horsmonden Parish Council     | The Parish Council supports the Draft Plan which gives a comprehensive overview of the AONB both now and for the future. Maintaining the separation of the distinct individual settlements within the Area is considered to be particularly important in the face of pressures for development. It has to be accepted that some development will have to take place but this should always be sympathetic to its immediate surroundings and the overall aims and objectives of the Draft Plan   | Noted   |
| Overall comments | Wadhurst Parish Council       | The Plan also needs to say more about how we are to "market" the High Weald AONB. Many people who live in the Weald do not realise the extent of the High Weald AONB or that is has a similar status equivalent to a National Park. Compare the image of the High Weald with that of Cotswolds or the South Downs, one an AONB the other a National Park but appear to have a far greater public profile than our own AONB and without such visibility its very difficult for more people to care about it or do more to support the protection and enhancement of the Natural Beauty that surrounds us.  | Actions to promote the AONB included in OQ1   |
| Overall comments | James Eaton-Brown             |   |   |
| Overall comments | Kent County Council           | Please see appended letter for this as too much information Aircraft Noise:Given the level of aircraft overflight in this particular area of Kent, KCC recommends the Management Plan makes reference to the Air Navigation Guidance 20171 which states within its Altitude Based Priorities that:  | Aircraft noise added to OQ4   |
| Overall comments | Kent County Council           | Please see appended letter Having considered the Management Plan, KCC notes the absence of any understanding of safeguarded economic minerals within the Kent area of the High Weald AONB. Specifically, the following minerals occur in the Kent area of the High Weald AONB, as outlined in the adopted Policies Maps (Mineral Safeguarding Areas) of the Kent Minerals and Waste Local Plan 2013-2030 (KMWLP):   | Noted.The Plan is not a rural strategy and is led by the AONB purpose.  |
| Overall comments | Kent County Council           | Please see appended letter Re-afforestation<br>KCC notes that the High Weald is significant in a wider south east context, in that it hosts the headwaters of a number of river catchments - Medway (Beult, Eden and Teise), Rother (Crane Brook, Brede and Tillingham), Thames (Mole), Arun, Adur, Ouse and Cuckmere. Therefore, in terms of the delivery of environmental services and wider regional benefits across the AONB, KCC considers that the Management Plan should set targets for re-afforestation of the formerly thickly wooded High Weald.   | The High Weald with nearly 1/3 land covered by trees is one of the most wooded areas of England. In view of the vulnerability of non-wooded habitats and importance of farmed land for food and cultural character no further afforestation targets are proposed. Opportunities for small-scale creation of new |

**High Weald Management Plan 2019 - Public consultation statements and responses**

| <b>Topic</b>     | <b>Organisation or person</b> | <b>Detailed comments</b>  | <b>AONB Responses</b>   |
|------------------|-------------------------------|---|---|
| Overall comments | Mid Sussex DC                 | However, it would be helpful if the 'lead' authority or groups of authorities which should work together on each specific aim or action were identified. This would improve accountability and clarity. In addition, some of the aims and actions should have an indicative timescale for delivery.<br>Working together for a better Mid Sussex; Planning Policy and Economic Development; Business Unit  | Proposal welcomed. Restrictions on local authority forward commitment limit this approach. Aims and Actions are indicative of the steps needed to meet statutory objectives. Other actions and amendments to actions by many organisations and individuals will also be needed to achieve objectives. |
| Overall comments | Sussex Wildlife Trust         | We note that each section relating to a characteristic of natural beauty contains a summary of natural and cultural capital, which is fantastic to see. However there does not seem to be any aims and actions that specifically mention natural capital or ecosystem services. For example, we would encourage the adoption of an aim to map the natural and cultural capital of the AONB and embed this into local plans and strategies   | Reference to data sets held by the JAC on natural and cultural capital added to introduction  |
| Overall comments | Natural England               | Natural England notes the reference to the Government's 25 Year Environment Plan within the foreword. The main text of the Plan should also take account of and reference this wider policy context. For example, the 25 Year Plan embeds a 'net environmental gain' principle for developments to support the recovery of biodiversity locally and nationally. This principle will become mandatory later this year and it would be relevant to incorporate the principle of net gain throughout the Management Plan.  | Concern about clarity of net environmental gain. Net biodiversity gain added to introduction  |
| Overall comments | Natural England               | Natural England notes that whilst the 2014-2019 Management Plan included a "monitoring and evaluation" chapter, this has not been included in this Draft Management Plan. The inclusion of this section would be welcomed, or the inclusion of an introductory section which highlights progress made during the previous Management Plan and its key successes, to make the 2019-2024 Management Plan more accessible as a standalone document. As was also the case in the previous Plan, it is suggested that the definition of 'natural beauty' on p.18 is given before the Vision to provide context   | An explanation of monitoring and evaluation is included in the Introduction and as a separate appendix  |
| Overall comments | Natural England               | The indicators of success throughout the Management Plan could more fully reflect the corresponding objective. In a number of cases the indicator(s) of success only address part of the objective and its associated aims and actions. Whilst Natural England accepts the challenges in identifying regular and available data sets, opportunities for seeking greater alignment have been highlighted in the proceeding sections of this letter   | In the absence of a nationally agreed procedure for monitoring natural beauty the Plan seeks to adopt a limited set of achievable and cost-effective indicators   |
| Overall comments | Natural England               | Throughout the document, various terms are used to describe those who manage the land including "site-managers", "landowners" and "farmers". The complexity of landownership and management within the AONB and the variety of land-related stakeholders could be referenced in the introductory section to set the context for the specific actions throughout the Plan. For example, on p.22 one of the aims and actions seeks to "promote landowner awareness and support dedicated advisors for water and soils management". In instances such as this it would be beneficial to reference all whom play a role in land management as in many instances the landowner is distinctly separate from the land manager. | Reference to private land ownership and importance of many types of land managers added to introduction   |
| Overall comments | Rother District Council       | One minor point I would make is that one additional reference should be included in the list of 'Evidence' in the Settlement chapter (after 'Key Characteristics'), namely: Martin, D and Martin B (2009) Farm Buildings of the Weald1450-1750.   | to be added   |
| Overall comments | TWBC                          | Move policy preamble to the front and widen glossary  | Amended.  |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic                              | Organisation or person   | Detailed comments  | AONB Responses   |
|------------------------------------|--------------------------|--|--|
| Vision                             | CLA                      | Within the vision, bullet point 2, it states that "is maintained under 'traditional' land management practices. We would suggest that the word 'traditional' is removed as it is not practical in an agricultural and rural world which by its very nature adapts and diversifies. We would suggest that it is replaced with 'conventional.'   | Traditional removed.   |
| Vision                             | Woodland Trust           | For the Vision: "Is maintained under 'traditional' land management practices..." would prefer something along the lines of "Preserves 'traditional' land management practices where possible..."   | Vision amended.  |
| Vision                             | Wealden District Council | Concerning bullet point 2 of the Vision (page 17), maintaining the AONB landscape under traditional land management could be too prescriptive in that it may stifle innovative forms of development or land management. In terms of the 'Aims and Actions' sections within the Management Plan, it is a little confusing and unclear as to which public bodies should be undertaking/implementing these.   | Vision amended.  |
| Vision                             | Natural England          | As discussed under general comments, the vision should take account of Defra's 25 Year Plan and where possible align terminology with the Plan. It is suggested that 'thriving wildlife,' 'recovering biodiversity' and 'clean water' could give meaning to the term 'improving ecological quality.'<br>Defra's plan states that "over the coming years the UK intends to use a 'natural capital' approach as a tool to help us make key choices and long-term decisions." The following bullet point is suggested for inclusion for the vision of the High Weald AONB:<br><b>- Is understood in terms of its ecosystem services and natural capital, supporting continued conservation of the protected landscape and promoting engagement across all sectors</b> | Vision amended. Natural and cultural capital addressed in each chapter.  |
| Vision & Statement of Significance | Individual comment       |  | Support welcomed   |
| Vision & Statement of Significance | CPRE - Tunbridge Wells   | Agree, but the indicators of success throughout this document seem a bit limited   | Noted. Limitations are due to resource constraints, absence of data and challenges of compiling data across multiple authorities |
| Vision & Statement of Significance | Individual comment       |  | Support welcomed   |
| Vision & Statement of Significance | Individual comment       |  | Support welcomed   |
| Vision & Statement of Significance | Sussex Wildlife Trust    | Vision and Statement of Significance<br>The Sussex Wildlife Trust strongly supports the Vision and in particular the references to land being managed for <b>public benefit</b> , improving ecological quality and embracing a low-carbon future. We notice that the term 'public benefit' is not included in the plan's glossary. It might be helpful to define what the advisory committee constitutes as 'public benefit' in terms of the High Weald. For example food production should be considered a public benefit, but not if it is at the cost of other ecosystem services such as pollination and soil formation.   | Support welcomed   |

**High Weald Management Plan 2019 - Public consultation statements and responses**

| <b>Topic</b>              | <b>Organisation or person</b> | <b>Detailed comments</b>  | <b>AONB Responses</b>   |
|---------------------------|-------------------------------|---|---|
| Statement of Significance | Ashford Borough Council       | <p>While generally supportive of the Statement of Significance of the AONB presented on Page 19, we would advise that, to ensure the effectiveness of this statement, some consistency issues are clarified within this section for clarity. For example, paragraph 2 outlines a case for the area's diversity, while later in outlining its defining components, the case for its homogeneity is presented. The clarity of this important statement, therefore, is lost.</p> <p>The presence of intrinsically dark skies in the AONB is demonstrated by global satellite radiance data, and we are pleased to see this important natural feature highlighted in this Management Plan. This is supported in Ashford through the Dark Skies SPD, which provides guidance on external lighting to minimise the impact of obtrusive light on intrinsically dark landscapes. We would advise reference to "naturally dark skies" is amended to "intrinsically dark landscapes", since this mirrors professional technical terminology in the avoidance of light pollution. Such recognition is particularly important in the application for an International Dark Sky Community designation, which would apply to a contiguous Parish area (including parts of the High Weald AONB) in this borough.</p> | Noted. Intrinsically dark landscapes referenced in Settlement character |
| Statement of Significance | Wadhurst Parish Council       | Generally, Wadhurst Parish Council recognises and supports the objectives contained within the plan. However, it is concerned that in the Statement of Significance, no mention is made of protecting and nurturing the biodiversity of Ancient Woodlands.  | Objectives for ancient woodlands included in W1 and W2                  |
| Statement of Significance | Natural England               | The description of Field and Heath should reference 'lowland heath'. The revised Plan makes reference to 'wooded heaths' whilst the 2014-2019 Plan made reference to 'zones of heath'. Wooded heath forms part of a habitat mosaic which contributes to the ecological functioning of priority habitat of lowland heathland. It is advised that lowland heathland is referenced within the Statement of Significance and throughout the Plan.   | Statement of Significance and FH character revised.                     |
| Statement of Significance | Rother District Council       | "Other qualities and features that are bound up with, and intimately connected to, the interaction between the natural landscape and people, and which enrich the character components. Such qualities and features include locally distinctive features such as historic parks and gardens, orchards, hop gardens, veteran trees, along with their rich and varied biodiversity; and a wide range of appealing and locally distinctive historic buildings including oast houses, farm buildings, Wealden Hall houses and their associated features such as clay-tile catslide roofs. Meanwhile people value the wonderful views and scenic beauty of the High Weald, they appreciate the area's ancientness and sense of history; they enjoy its naturally dark skies and the opportunity to see starry skies, the relative sense of tranquillity, and the ability to get out and about, and close to nature, through the myriad public rights of way.   | revised in part   |
| What is natural beauty    | Ashford Borough Council       | ABC is supportive of the issues raised and objectives set within this Management Plan. However, we feel that the responsibility for addressing these, currently allocated to "Public Bodies" could be misleading. A number of objective in the plan can be just as well addressed with the intervention of the private sector, or with partnership working between bodies. The management plan should recognise the agency of the private sector in a number of the recommendations.  | Action plan amended accordingly.  |

**High Weald Management Plan 2019 - Public consultation statements and responses**

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|--------------|--|---|---|
| Geology      | Hastings and District Geological Society | In addition to the above, the Booth Museum of Natural History, Brighton, BN1 5AA, compiled a list of Regionally Important Geological Sites (RIGS) in the 1990s'.  | Noted.  |
| Geology      | James Eaton-Brown                        | Far more use should be made of volunteer work parties to eradicate unwanted species; for example, the RSPB Broadwater Warren working party is oversubscribed. People want to fix their countryside!   | Agree. The value of volunteers will be stressed in section 1. |
| Geology      | Individual comment                       | Under G1: Communities could promote greater awareness of what the non-native species are (e.g., Himalayan Balsam) also farmers and indeed individuals with good-sized gardens could helpfully be provided with guidance as to how to manage their land to reverse the decline in wildlife   | Added to G1 Aims and Actions                                  |
| Geology      | Ashford Borough Council                  | It is encouraging to see within this Plan a real appreciation of the importance of the geology of the High Weald, and its associated features including fault lines, springs and emergent watercourses.<br>We are supportive of the Plan's attention to the water environment in Objective G1, taking a holistic view to the restoration of natural function of river catchments. The Ashford Water Group, a partnership working group including ABC, the Environment Agency, Kent County Council, South East Water, Southern Water Services, and the River Stour (Kent) Internal Drainage Board, has met regularly for over a decade to ensure the water environment is considered in managing development. Through this group, Ashford has pioneered provision of Sustainable Drainage (SuDS) on all developments and has driven water efficiency measures through its planning policy. It also supports and funds improvements in local water quality through the Kentish Stour Countryside Partnership as well as through the designation of the Ashford Green Corridor – a multi-functional green and blue network. We have therein demonstrated the ability to respond to the constraints of already limited rainfall and a changing climate, supporting a “twin track” approach to demand management and resource improvement. We are therefore supportive of an integrated approach to water resource management as promoted within this Management Plan. | Support welcomed.   |
| Geology      | Environment Agency                       | Given the rural setting across the Weald the presence of mains drainage in some areas may be quite limited, so future developments may require assessments into alternatives to main drainage, such as cess pits or treatment plants. These will have to comply with general binding rules or a permit will need to be applied for from the EA. It may be worth mentioning this specifically in Section G1 on page 22.<br>Additionally, given the rural nature of the Weald there are likely to be several private potable abstraction BH. It would be beneficial to highlight this, as these supplies are unlikely to be highlighted in the same way as public abstractions or receive the same level of raw water treatment. Highlighting this will encourage a greater awareness of public responsibility for managing all drainage and ensuring septic tanks and cess pits are well maintained.<br><br>The secondary aquifers across the Weald provide base flow to stream and rivers, groundwater resource management is therefore important in aiding the restoration of the natural function of all river catchments, which is highlighted in the plans in the first section.  | Clarification provided in G1 Aims and Actions                 |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic   | Organisation or person   | Detailed comments   | AONB Responses   |
|---------|--------------------------|---|--|
| Geology | Kent County Council      | <p>Objective G1: To restore the natural function of river catchments.</p> <p>The text contains the aim to “tailor sustainable drainages systems (SuDS) to the landscape character of the High Weald.” KCC recommends that this objective should also recognise that SuDS may have both direct and indirect impacts on the historic environment. Direct impacts could include damage to known heritage assets – for example, if a historic drainage ditch is widened and deepened as part of SuDS works. Alternatively, SuDS may directly impact on unknown assets such as when SuDS works damage buried archaeological remains. Indirect impacts can occur when the ground conditions are changed by SuDS works, thereby impacting on heritage assets. Archaeological remains in particular are highly vulnerable to changing moisture levels which can accelerate the decay of organic remains and alter the chemical constituency of the soils. Historic buildings are often more vulnerable than modern buildings to flood damage to their foundations.</p> <p>When SuDS are planned, therefore, it is important that the potential impact on the historic environment is fully considered and any damage is mitigated. This is best secured by early consideration of the local historic environment, following consultation with the Kent Historic Environment Record (HER) and by taking relevant expert advice. KCC has recently produced advice for SuDS and the historic environment, which provides information about the potential impact of SuDS on the historic environment, the range of mitigation measures available and how developers should proceed if their schemes are likely to impact on heritage assets.</p> <p>KCC is supportive of the aim to “consider landscape archaeology in any activities affecting river catchments”, but would also hope that landscape archaeology, and indeed other forms of archaeology, would be considered for all actions carried out by public bodies within the AONB.</p> | Clarification provided in G1 Aims and Actions  |
| Geology | Wealden District Council | Objective G1 Aim/Action 1 (page 22) - Requiring SuDS to be tailored to the landscape character of the High Weald would be difficult to enforce on developments, as the most suitable SuDS scheme for the site may not reflect the landscape character but be otherwise appropriate, and does not harm the landscape character.  | CROW Act 2000, Section 84. confirms the powers of a local authorities to take ‘all such action as appears to them expedient’ to conserve and enhance the natural beauty of an AONB |
| Geology | Sussex Wildlife Trust    | The Sussex Wildlife Trust supports the key characteristics listed in this section and the inclusion of the three objectives for this component of natural beauty. We are particularly pleased to see the inclusion of objective G1 and are keen to work proactively with the High Weald AONB unit to achieve this. <b>We question the suitability of referring to SuDS</b> in the first aim as this is primarily an urban solution whilst the rest of the text refers to the rural nature of catchment restoration. Perhaps this could be moved lower down the list. An additional aim for public bodies should be understanding the flood risk within LPA areas and investigate the natural flood management solutions that may contribute to alleviation of these. We would also like to see a prioritisation exercise for natural flood management and other wetland enhancement measures within the High Weald so that resources can be used efficiently. Finally an action for both public bodies and others to develop clear messages around the role of natural flood management in delivering a range of ecosystem services would be welcome.   | Support welcomed. Clarification provided for SuDS and flood management in G1 Aims and Actions  |
| Geology | Sussex Wildlife Trust    | An additional aim for public bodies should be understanding the flood risk within LPA areas and investigate the natural flood management solutions that may contribute to alleviation of these. We would also like to see a prioritisation exercise for natural flood management and other wetland enhancement measures within the High Weald so that resources can be used efficiently. Finally an action for both public bodies and others to develop clear messages around the role of natural flood management in delivering a range of ecosystem services would be welcome.  | Clarification provided for SuDS and flood management in G1 Aims and Actions  |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic   | Organisation or person | Detailed comments  | AONB Responses  |
|---------|------------------------|--|---|
| Geology | James Eaton-Brown      | <p>systems and climate? (please state which objective you are commenting on)</p> <p>Objective G1/3: Water systems within the AONB are all in a very poor state of health. I do not know of a single ghyll or stream, and even some of the few remaining ponds on agricultural land, that is not suffering from invasion by himalayan balsam ( Impatiens glandulifera) and the American signal crayfish, not to mention run-off from fertilisers and muck-spreading. Any management plan which does not contain a genuine commitment to the eradication of these species from the AONB, and to clean up the water in the system itself, cannot be taken seriously.</p> <p>Also, many fields have been 'improved' (i.e. since the end of the Second World War have become little more than a 'green desert') for livestock, almost all the rivers have been 'channelised', even the filling in of ponds. Quite aside of the exacerbation of flooding risk this increased drainage causes (witness the recent floods in Tunbridge Wells), it acts to the detriment of the unique biodiversity of the AONB. This should be reversed; more of what were once carrs, bogs, floodplains and water meadows should be restored on as wide a scale as is feasible.</p> | Clarification provided for invasive species in G1 Aims and Actions  |
| Geology | CLA                    | <p>To protect sandstone outcrops, soils and other important landform and geological features – CLA support the objective to encourage and support farmers to protect soils by planting trees and hedgerows. This can be achieved by working on a payment for public goods model such as the CLA's Land Management Contract: <a href="https://www.cla.org.uk/Land-Management-Contract">https://www.cla.org.uk/Land-Management-Contract</a></p>  | Clarification added on payment for public benefit in Section 1  |
| Geology | Kent County Council    | <p>Objective G2: To protect sandstone outcrops, soils and other important landform and geological features.</p> <p>KCC would like to add that, although supportive of the general objective to conserve the geological features and outcrops, it may sometimes be necessary to permit small scale extractions of rare minerals for historic buildings and features.</p> <p>KCC is supportive and agrees that the monitoring of the SSSI can be undertaken and provide indicator of success. KCC is however cautious of the latter indicator due to the inherent difficulties with monitoring earth worm numbers. KCC recommends this indicator is reviewed to understand if it is possible to link in to any Environmental Stewardship Schemes or similar schemes which are aimed at improving the soil quality of farms.</p>  | Small scale extraction already included in G2 Aims and Actions. Intent of earthworm Indicator of Success is to encourage citizen science and people's engagement with soils |
| Geology | Natural England        | <p>Objective G2: Whilst Natural England supports the ambition to see "100% geological SSSIs in favourable condition" there is concern that this will be not be feasible over the duration of this Management Plan. Natural England's target for SSSI condition is 95% in favourable and unfavourable recovering. It is suggested that this indicator of success is aligned with Natural England's ambitions. Natural England note that despite the ambitious target for geological SSSIs the aims and actions for Objective G2 do not appear to address how this objective will be achieved. It is suggested that aims and actions focused on providing support for research into geological sites to inform their conservation and management could be most impactful.</p> <p><b>As such, the following aims and actions are suggested for inclusion under Objective G2: For public bodies: Engage with landowners of geological SSSIs to promote good management practices;</b></p> <p><b>For others: Support research into geological sites within the AONB to inform their conservation and management</b></p>   | 100% of SSSI's in a favourable condition is an Indicator of Success for the long term objective G2 rather than a target. Proposed Aim and and Actions Added to G2           |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic   | Organisation or person   | Detailed comments   | AONB Responses  |
|---------|--------------------------|---|---|
| Geology | Ashford Borough Council  | <p>ABC is particularly supportive of the Management Plan's aim to improve landowner awareness of water and soils management. One of the key causes of flooding in the rural area is inadequate maintenance of drainage features, including silting from inadequate land management techniques.</p> <p>We welcome the Plan's recognition of the need for a shift in the production of energy to more renewable sources, however the guidance presented under Objective G3 could benefit with a greater degree of clarity. While we appreciate this section seeks to provide a broad and flexible basis for reducing reliance on fossil fuels, certain renewable generation techniques may have a greater impact on landscape character. This section could benefit from an expanded consideration, perhaps including some case studies, of those types of renewable energy generation that are more likely to maintain the integrity of the AONB's character. Nevertheless, in overall terms the objectives presented within this section are consistent with the scope of the Environmental Policies within the Ashford Local Plan to 2030.</p> | Support welcomed  |
| Geology | C.Brooks                 | Objective G3 – reducing locally arising greenhouse gas emissions. Whilst supportive, this should not extend as far as allowing and renewable energy schemes within the AONB, which would be visually contrary to the AONB's character.  | G3 clarifies that renewable energy schemes need to be landscape sensitive   |
| Geology | CPRE - Tunbridge Wells   | <p>G3 Plant native trees and hedges in existing gardens and in new developments. Plant at least one tree (allowing sufficient space for it to grow to maturity) for every new dwelling built. This will help to maintain the wooded character of the High Weald and to mitigate climate change and its effects.</p> <p>G3 Build water storage facilities and grey water recycling systems in new developments</p>   | Grey water schemes added to G1 Aims and Actions   |
| Geology | Surrey Highways          | <p>In this context, the WPA welcomes the inclusion of the suggested example action under Objective G3 of the High Weald AONB Management Plan, i.e.,</p> <p><b>'Reduce by-products which are burnt or sent to landfill from management interventions (consider opportunities for new markets for waste'</b></p>  | Support welcomed  |
| Geology | Wealden District Council | Objective G3 Aim/Action 5 (page 24) – Whilst the Council would support and encourage the protection of soils from erosion and contamination, it cannot protect indefinitely undisturbed soils as this would stifle development  | CROW Act 2000, Section 84. confirms the powers of a local authorities to take <i>'all such action as appears to them expedient'</i> to conserve and enhance the natural beauty of an AONB |
| Geology | Wealden District Council | Objective G3 Aim/Action 6 (page 24) - As a Local Authority we would be unable to require or insist that developments use local timber and therefore achieving this aim would not be possible.   | CROW Act 2000, Section 84. confirms the powers of a local authorities to take <i>'all such action as appears to them expedient'</i> to conserve and enhance the natural beauty of an AONB |
| Geology | Sussex Wildlife Trust    | The Sussex Wildlife Trust would like to see further indicators of success used for objective G3. For example, reductions in energy demand and increase in sustainable transport provisions, rather than just an increase in green energy production.  | G3 amended to include these.  |
| Geology | Hastings Borough Council | under Key Characteristics, first bullet point we would advise that Hastings Cliffs Special Area of Conservation, SAC, be mentioned alongside Hastings Cliffs SSSI. The European designation is in addition to the national designation.   | Added   |
| Geology | Kent County Council      | KCC notes that the characteristics identified in the draft document appear to represent the geology, landform, water systems and climate accurately. It should be noted however, that many of these characteristics will have heritage implications. For example, the pond bays and hammer ponds referred to are heritage assets associated with the nationally important iron working industry of the Weald. They will be associated with archaeological features and they link to aspects of the local historic landscape. Similarly, the old quarries will be associated with workings and lime kilns. These issues are referred to elsewhere in the Management Plan, but KCC considers it important to understand that the heritage of the area is fully integrated with the geology, landform and water systems.   | Heritage assets added to Vision   |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic   | Organisation or person                   | Detailed comments  | AONB Responses  |
|---------|--|--|---|
| Geology | Kent County Council                      | Key characteristics: The inclusion of “ponds at a density five times higher than the national average with a wide range of pond types supporting high populations of internationally rare Great Crested Newts” is welcomed by Natural England. Natural and cultural capital – facts and figures:<br>To complement the key characteristic focusing on ponds which support high populations of Great Crested Newts (GCN) the following is suggested for inclusion<br><b>It is estimated that 1600 ponds within the High Weald AONB support GCN.1</b>                           | Added to facts and figures  |
| Geology | Individual comment                       | The summary of the distinctive features of the AONB Are set out very well  | Support welcomed  |
| Geology | Individual comment                       | Conservation MUST Be given priority over development   | Recognised. A matter for local authorities to address in their local plans.   |
| Geology | Individual comment                       | Some flexibility will be required to enable land to continue to be farmed or remain in woodland. Allowing flooding of some area to even out the flow of water should be encouraged.  | Agreed. Recognised in G1  |
| Geology | Individual comment                       | More acknowledgement of the extent of private ownership (and management) would be good.  | Point added to the Introduction About the Plan  |
| Geology | Individual comment                       | After having watched the 1st of July edition of Countryfile, I am most concerned about water companies syphoning off untreated sewage into our rivers. Is there any method in place for the High Weald to monitor our rivers? Another matter is the fishing pond in Mayfield. They dumped and algae suppressant into the pond last year, and overdid it, turning all the rivers and streams in the area a neon aqua blue. They have done it again this year, but not to quite the same extent. Does the High Weald have any mechanisms for coping with all of this pollution | All public bodies, including water compnaies have a duty of regard to the AONB under the Countryside and Rights of Way Act. This is set out in the Management Plan. |
| Geology | Hastings and District Geological Society | would like to recommend “The Weald” by Wes Gibbons ISBN 0-04-554004-4 published by Unwin Paperbacks. Although some of the detail needs to be brought upto date, some of the contents cover the High Weald, in particular, the River Line Section SSI and the Jurassic gypsum bearing Inliers in the Mountfield to Brightling area.   | Noted.  |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic      | Organisation or person  | Detailed comments   | AONB Responses  |
|------------|-------------------------|---|---|
| Settlement | Individual comment      | All over the AONB communities are saying the same thing, but they are simply not being heard. Huge developments, and ribbon development, outside of the existing footprint settlement MUST cease. The infrastructure cannot take it, and instead small developments of a few houses on brownfield sites within the current footprint of settlement. Many people protest and object, but it counts for nothing. A volunteer working group for concerned parties, spearheaded by the AONB organisation in partnership with conservation charities, but staffed by volunteers with local knowledge, should be set up in order to preserve what little is left of this AONB. The Sussex Ornithological Society is one organisation which has already done so. Consultation with them would be wise.   | The Plan recognises that conservation of the AONB is best achieved by small developments in the right place (S2)                                      |
| Settlement | Mid Sussex DC           | A number of the aims/actions in the Plan would require additional resourcing by Local Planning Authorities to ensure their delivery, particularly in respect of aims/actions in the Plan relating to historic assets. While the Council is seeking to increase resourcing of its heritage team, there are a number of competing priority workstreams which may need to be delivered before the aims and actions set out below   | Noted   |
| Settlement | Natural England         | Indicator (i) should make reference to sustainable businesses in order to avoid inappropriate development which does not support the conservation of the High Weald AONB. In support of the reference to ecological enhancements under the Aims and Actions for Public Bodies, Natural England suggest that an indicator of success could be; All local authorities have policies requiring net gain from development.  | S1 Rationale describes sustainable settlements. IoS (i) refers to conditions for businesses to flourish. Net biodiversity gain added to introduction. |
| Settlement | CPRE - Tunbridge Wells  | The top five issues should mention the increasing speed and volume of traffic which leads to a loss of character in routeways and the growing inability of non-motorised users to enjoy this feature of the High Weald owing to road safety fears.  | Traffic added to OQ4  |
| Settlement | Wadhurst Parish Council | The Council is also concerned that though in the section on Natural Beauty; Settlement on page 27, the Top Five Issues identify that the increase in greenfield development pressure threatens the character of the AONB and the generic layout and design of new housing developments failing to respond to or reinforce the AONB character is also an issue together with the erosion of the AONB character through sub-urbanisation, including the pressure for residential intensification etc. Despite that being a threat of high significance, nothing is offered to counteract those pressures that are affecting the character of the AONB now and in the near future. Indeed, within the Vision statement on page 17, fifth bullet point, by using the word "accommodate" could imply that there are no limits to development in the AONB, as Local Authorities could always find reasons to justify allowing more development in the AONB as the plan has set no limits to such development. | Comment appreciated but it is the district local plan which needs to set limits on development. Vision amended  |
| Settlement | Kent County Council     | KCC agrees with the five issues identified in the character section. The greatest threat to the heritage of the AONB is in the form of a gradual degradation of historic character by new housing, routeway improvements and suburbanisation. KCC would recommend that consideration is also given to the potential issue of a loss of character arising from highways improvements, signage and lower quality street furniture.  | Dealt with in Routeways section   |
| Settlement | Natural England         | An Independent Review of Housing In England's Areas of Outstanding Natural Beauty 2012-2017 reported that there has been a significant increase in the number of planning applications within AONBs and their setting over the five year period. The High Weald AONB experienced the highest number of units built per 1000 households of all AONBs 2015-2017. As such, it is appropriate that the 'top five issues' have a strong focus on development pressures. Natural England commends the High Weald AONB Partnerships on working proactively with local authorities and developers to reduce the impact of development on the special characteristics of the AONB.   | Support welcomed  |

**High Weald Management Plan 2019 - Public consultation statements and responses**

| Topic      | Organisation or person        | Detailed comments   | AONB Responses   |
|------------|-------------------------------|---|--|
| Settlement | Ashford Borough Council       | <p>This is an important constituent of the Management Plan, and a matter that we appreciate the AONB research unit has previously addressed extensively in its background research. The Ashford Heritage Strategy also picks up this theme with regard to those parts of the AONB within its area.</p> <p>While we would broadly support those broad points about Wealden settlement outlined on page 25, we feel that the particular High Weald settlement pattern relating to Ashford borough is distinct in that it is highly related to the former coastal estuary of the River Rother, its particular topography and those areas of economic activity facilitated by this. This is not taken into account within the Management Plan.</p> <p>The settlements on the Isle of Oxney (including Wittersham and Stone) should be viewed in their landscape context in this unique location within the AONB, where the land-sea boundary has changed dramatically through time. Today, the land-sea boundary is artificially established at Scot's Float Sluice, but under natural conditions the twice daily tides would back up the Rother probably as far as Newenden. The Levels both north and south of Oxney represent two large former tidal inlets. Wittersham (Wihtric's - hamm ) means Wihtric's "promontory into the marsh" rather than the habitative - ham meaning village, along with many other - hamms in the Rother valley (Maytham, Kichenham, Methersham, Lossenham, Padgham, Bodiam etc.) all signifying settlement on land jutting out into the marsh. Here, the Rother estuary was a key determinant of settlement type and pattern. Stone-in-Oxney is likely to have originated as a crossing point from the island to the mainland at Appledore. The Stone Ferry Inn still marks the point of departure.</p> <p>Furthermore, the settlements of Smallhythe and Newenden developed on the basis of their riverside location, initially transporting timber out of the Weald, and subsequently serving as shipyards of national significance.</p> | Noted. Point added to Settlement characteristics   |
| Settlement | Natural England               | <p>Key characteristics: The clear reference to the distinctiveness between settlements "formed by fields associated with historic farmsteads" is welcomed, and is an important feature to conserve. The key characteristics accurately portray the features of settlements within the High Weald AONB.</p>  | Support welcomed   |
| Settlement | CPRE Sussex Countryside Trust | <p>Policy DTP1: All Local Planning documents, Neighbourhood Planning, and planning decision-making processes should have regard to:</p> <ul style="list-style-type: none"> <li>• the statutory AONB Management Plan;</li> <li>• Position Statements;</li> <li>• Cotswold Landscape Assessment and Landscape Strategy and Guidelines;</li> </ul> <p>issued by the Board, as well as the following criteria in determining the acceptability of proposed development in the Cotswolds AONB.</p> <p>Development should:</p> <ol style="list-style-type: none"> <li>a) Consider and be compatible with the distinctive character of the location as described by the relevant landscape character assessment and landscape strategy and guidelines;</li> <li>b) Incorporate designs and landscaping consistent with the landscape character assessment and landscape strategy and guidelines;</li> <li>c) Be designed to respect local settlement patterns, conserve the historic environment, building styles, scale and materials;</li> <li>d) Incorporate appropriate sustainability elements and designs including: <ul style="list-style-type: none"> <li>-green infrastructure at local and strategic levels,</li> <li>-innovative designs which are informed by local character and scale;</li> </ul> </li> <li>e) Consider the need to protect ancient and other semi-natural woodland as part of development proposals;</li> <li>f) Have regard to the impact on tranquillity, including dark skies;</li> <li>g) Enhance local community amenities, services and access to them;</li> </ol>  | Support for the approach of Cotswolds Conservation Board is noted. A Conservation Board is a different governance structure to the High Weald JAC, having executive powers and the ability to recommend an approach to local planning authorities. |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic      | Organisation or person          | Detailed comments  | AONB Responses  |
|------------|---------------------------------|--|---|
| Settlement | Wadhurst Parish Council         | We are also concerned that the plan makes no comment on the scale of possible developments in the AONB especially when it has been mooted that NEW villages could be created in the AONB to satisfy housing need, a concept that surely would have a dramatic impact and could only lead to the coalescence of villages leading to urbanisation within the AONB.<br>In short, the plan with respect to development in the AONB has to be more rigorous in how it is to respond to the “issues” identified by its own research.   | Comment appreciated but it is the district local plan which needs to set limits on development.   |
| Settlement | Ashford Borough Council         | We feel that more should be made of the significance of the Rother to the High Weald as a key determinant of settlement formation and character, which has implications for Objective S1 in particular.<br>There is much evidence presented within this section as to the particularly special and distinct qualities of settlements within the High Weald AONB. We would expect the Aims and Actions section, therefore, to specifically address ways in which these special and distinct characteristics can be retained. This is undertaken well under Objectives S2 and S3. However, we feel the itemised list presented under Objective S1 on page 27 simply presents an idealised aspiration for any community in the country that should be further justified to be effective within the context of an AONB management plan.  | Noted   |
| Settlement | Tunbridge Wells Borough Council | S1 – Think that small scale horticulture is not appropriate for the High Weald as it is not part and parcel of the underlying historic character and is difficult to define. It can also include significantly harmful structures such as poly tunnels and lead to further harmful development such as garden centres a large part of which would be non horticultural. Please remove reference to horticulture. Could add reference to community orchards   | Small scale growing of vegetables, top and soft fruit would have been a component of most small farms with allotments a typical feature of villages. Evidence points to small-scale horticulture in the High Weald being critical to sustainable land use in the future (University of Reading 2009). We would expect large-scale structures to be subject to planning control. |
| Settlement | Kent County Council             | Objective S1: To reconnect settlements, residents and their supporting economic activity with the surrounding countryside.<br>At present, the aims and actions include a requirement for an archaeological watching brief for development affecting historic farmsteads. KCC recommends that this language needs to be revised as a watching brief will not be suitable in all occasions. For example, at some sites, historic building recording may be needed. At others, archaeological evaluation may be required or even potentially preservation in-situ of important remains. “Require an archaeological assessment for development affecting historic farmsteads.”<br>To encourage sustainable economic activity it may sometimes be necessary to permit development within historic farmsteads. Development between villages and hamlets and among farm buildings would in many places be consistent with the historic character of those areas. Historic England, KCC and Kent Downs AONB have published guidance on historic farmsteads in Kent that considers how rural development proposals can be assessed for whether they are consistent with existing character. | S2 amended.   |
| Settlement | Wealden District Council        | Objective S1 Aim/Action 1 (page 27) – This Aim/Action is not compatible with the procurement processes at the Council. The Procurement Policies of Wealden District Council and Rother District Council specify that for a Type B Contract (a Contract valued between £5000 and £50,000) a minimum of three quotations must be sought and at least one of these quotations must be from a local supplier. For the larger contracts which require an open tendering process, the Councils’ policies require Council officers to break up the requirements of the larger contracts into ‘Lots’ where possible to enable SMEs to access the contracting opportunities. This is as far as Councils’ Procurement Policies go to promote access to local suppliers.  | CROW Act 2000, Section 84. confirms the powers of a local authorities to take ‘all such action as appears to them expedient’ to conserve and enhance the natural beauty of an AONB  |
| Settlement | Wealden District Council        | Objective S1 Aim/Action 6 (page 27) – This Aim/Action is not compatible with the Council’s approach to development as there may be cases where the loss of allotments to development is justified (i.e. where they are underused or no longer fit for purpose) and particularly where alternative provision of equal or greater standard is provided. A blanket protection of allotments, with no flexibility, could not be supported.   | CROW Act 2000, Section 84. confirms the powers of a local authorities to take ‘all such action as appears to them expedient’ to conserve and enhance the natural beauty of an AONB  |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic      | Organisation or person          | Detailed comments   | AONB Responses   |
|------------|---------------------------------|---|--|
| Settlement | Wealden District Council        | Objective S1 Aim/Action 7 (page 27) – Whilst opportunities to maximise wild species in the design of buildings, curtilages and open spaces would be supported if proposed as part of a development scheme, it would not be appropriate to require developments to do this. It is appropriate to require developments to ensure they do not result in a net loss of biodiversity, and contribute to a net gain/enhancement of biodiversity; however, this can be achieved with a variety of measures and approaches.   | Biodiversity gain added. CROW Act 2000, Section 84. confirms the powers of a local authorities to take <i>'all such action as appears to them expedient'</i> to conserve and enhance the natural beauty of an AONB |
| Settlement | Wealden District Council        | Objective S1 Aim/Action 8 (page 27) – Whether or not a development affecting an historic farmstead requires an archaeological watching brief or not will depend on its significance as a heritage/historic asset. It would not be reasonable to require an archaeological watching brief of every development affecting an historic farmstead this respect. In some cases permitted development rights may apply, in which case development could go ahead.   | CROW Act 2000, Section 84. confirms the powers of a local authorities to take <i>'all such action as appears to them expedient'</i> to conserve and enhance the natural beauty of an AONB                          |
| Settlement | Sussex Wildlife Trust           | We are pleased to see that reconnecting people with their surrounding countryside, and the wildlife it contains, is included as an objective. We would like the <b>sixth aim for S1 to be amended to requiring developments to maximise 'gains for biodiversity' in the design of buildings, curtilages and open space, rather than specifically wild species.</b>  | S1 amended.  |
| Settlement | Natural England                 | The term "wild species" on p.27 should be replaced by "wild native species". Invasive species, such as grey squirrel, may also be referred to as wild despite not being native  | S1 amended.  |
| Settlement | Individual comment              | Objective S1/S2: The AONB organisation conducting this consultation has historically been very poor at defending the AONB from inappropriate development. Various planning applications which directly affect the AONB either by being within, or directly abutting, its boundaries (Rosemead Farm in Horam, Springfield Nursery in Cross-in-Hand, Top-of-the-World, Heathfield, to name but three) have been ignored by the organisation, which habitually refuses to comment. Further, I have personally had correspondence with Wealden District Council including a statement that, contrary to claims, land with AONB status does not enjoy any special protection or consideration during planning deliberations. Until such an atmosphere changes, there can be no hope for Wealden. | Noted.   |
| Settlement | Individual comment              | Objective S2: Yes indeed – protect the essentially rural character of the AONB. Where new buildings have to be built, they should use traditional materials and be built in a style which blends in to the landscape  | Support welcomed   |
| Settlement | Individual comment              | Supportive of the objectives raised – with regard to S2, and the importance of "separation" between settlement, would support improvements to vehicle-free connections between settlements.   | Support welcomed   |
| Settlement | Tunbridge Wells Borough Council | S2 i) Support this principle but There is no definition of small settlements in some cases it might be hard to distinguish between minor hamlets and farmsteads and isolated dwellings. The use of "No" is also a bit absolute It might be better worded as "ensure new development does not result in a the physical or perceived coalescence of individual hamlets and villages and that key gaps between settlements are maintained.   | Reference to small removed and IoS amended   |
| Settlement | CPRE - Tunbridge Wells          | S2 It is not only the areas of separation between small settlements that need to be mapped and protected: areas of separation between all settlements need to be conserved. Delete "small" under Aims and Actions and in the indicators of success. Here again the indicators of success seem rather limited.   | Agreed. Amended.   |
| Settlement | Kent County Council             | Objective S2: To protect the historic pattern and character of settlement.<br>KCC supports both the objective and the aims and actions identified for this objective. The historic landscape and pattern and character of settlement is critical to the beauty and future of the AONB and should be conserved and enhanced during development. The High Weald AONB team has done excellent work in supporting historic landscape characterisation in the AONB. What could be further enhanced is an understanding of how to use Historic Landscape Characterisation data effectively in casework, and it would be helpful if the AONB team could develop guidance how to use the data effectively. KCC would be happy to discuss this further.  | Noted. Reference to HLC added.   |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic      | Organisation or person | Detailed comments   | AONB Responses  |
|------------|------------------------|---|---|
| Settlement | Mid Sussex DC          | I am concerned that there are some aims and actions in the Plan which are not consistent with the work which the Council is resourced to carry out. On page 28 (Settlement), there is a requirement to identify and map areas of separation between small settlements. MSDC does not have a District Plan policy on Strategic or Local gaps and therefore this work has not been carried out to date and there are no plans to do so.<br>A number of the aims/actions in the Plan would require additional resourcing by Local Planning | CROW Act 2000, Section 84. confirms the powers of a local authorities to take ' <i>all such action as appears to them expedient</i> ' to conserve and enhance the natural beauty of an AONB. However, these are an indicator of intent and recognise resourcing constraints |
| Settlement | CLA                    | Within objective S2, housing numbers should be delivered where required and not be limited by any such policy. Whilst we agree smaller developments may be prioritised, this should not constrain necessary development opportunities.  | The historic pattern and character of AONB settlement is a fundamental component of the natural beauty for which it is designated. Development which disregards this character will not be in keeping with the purpose of designation                                       |
| Settlement | Individual comment     | We should lobby the central government to encourage development in robotics so immigration can be stopped as this is the main cause of population growth and the resultant pressure on our wonderful landscape. There is much we could learn from Japan here  | The history of land management and craft industry in the High Weald is intimately linked with and an itinerant workforce and skills imported from elsewhere.  |
| Settlement | Individual comment     | Objective S3, supportive of AONB design guidance, but also support modern architecture with use of local materials.   | Support welcomed  |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic      | Organisation or person   | Detailed comments  | AONB Responses  |
|------------|--------------------------|--|---|
| Settlement | Horsham District Council | The aims and actions in respect of the historic built environment are welcome. We are am pleased to see reference to historic characterisation to help guide to the pattern of new development. We would however wish to see greater support for the extraction of traditional building materials, particularly building stone. This would facilitate the local distinctiveness of new development. We are also pleased that it is suggested that historic route ways are considered as non-designated heritage assets. It would be helpful to draw more attention should be drawn to traditional architectural detailing, particularly roof junctions in Objective S3. It may be that the Design Guide is a better place for this level of guidance and illustration but this is a key part of character alongside materials and layout referred to in the document.  | Support welcomed. Materials considered under geology. Reference to traditional architectural detailing added. |
| Settlement | Kent County Council      | Objective S3: To enhance the architectural quality of the High Weald and ensure development reflects the character of the high Weald in its scale, layout and design.<br>KCC is supportive of the aim to 'increase local listing and support a listed building review to tackle the under-listing of historic farm buildings'. Although not related to this particular objective, KCC would encourage the AONB team to use the local listing initiative to record all types of heritage asset, not just historic buildings. Archaeological sites and building will benefit from the additional focus and protection of local listing in the same way as historic buildings. Irrespective of whether the local list includes assets generally or just buildings, the AONB team will need to involve the relevant HER in the local listing programme from the very beginning.<br>KCC would like to see consideration of ecological connectivity/ biodiversity within this objective. The design of sites should be including landscaping which reflects the surrounding area and provides habitats/connectivity to wildlife and retaining existing features on site such as veteran trees, etc | Support welcomed. S3 amended to include landscaping   |
| Settlement | Mid Sussex DC            | Page 29 (Settlement) –The requirement to increase local listing and support a listed building review to tackle the under-listing of historic farm buildings.   | Noted   |
| Settlement | Individual comment       | My observation is that Section makes no mention of the importance of sound planning and provision of infrastructure components such as roads, schools, medical services, rail, airports, ports, power supplies, etc. Noting that I voted (in part) to leave the EU because of current overload of infrastructure, I would have expected to see the management of population density to be a key strategic factor to be mentioned in any "summary". It isn't.   | Noted. Importance of sound planning emphasised in Introduction.   |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic      | Organisation or person | Detailed comments  | AONB Responses           |
|------------|------------------------|--|--------------------------|
| Settlement | Individual comment     | The key characteristics box on page 25 is a very good summary of one of the most attractive features of the High Weald AONB – the charming nature of many rural dwellings  | Support welcomed         |
| Settlement | Individual comment     | Acceptance of further housebuilding and sensible planning for this would be useful. Similarly acceptance of diversified businesses in rural areas.   | Noted.                   |
| Settlement | Individual comment     | Having grown up in Southern California, I have witnessed in my lifetime the complete eradication of the natural landscape. I am very nervous about the concept of (and I quote): ‘Accommodates the housing and economic needs of thriving communities and the land based sector without compromising the key defining components of High Weald character’.<br>I do not think that this is strong enough to suppress any housing that would compromise the High Weald. No housing should be built on ‘green land’ full stop. To create housing in ‘brown sites’ or ‘grey sites’ would be fine. There are a number of architectural firms devoted to housing in areas already built up – and to NEVER go beyond. Once ‘green land’ is gone there is NOTHING you can do to bring it back. I think the High Weald should be more emphatic about this – particularly after the government has made a demand for more housing for a growing population | Vision amended.          |
| Settlement | Individual comment     | Strongly support promotion of walking, cycling and public transport improvements to reduce vehicle/traffic volumes. Improvement should be made of existing footpaths to encourage safe off-road cycling between settlements.   | Noted.                   |
| Settlement | Sussex Wildlife Trust  | Further to this, we recommend an additional aim for public bodies to promote the creation of green infrastructure which connects settlements to the wider countryside. Similarly the example action of making space for wildlife to thrive around buildings gardens and urban spaces should also be applied to public bodies as they often have control of the management of these areas.  | Connectivity added to S3 |
| Settlement | Lichfield Planners     | Natural Beauty: Settlement – Objective S2: seeks: “To protect the distinctive character of towns, villages, hamlets and farmsteads and to maintain the hinterlands and other relationships (including separation) between such settlements that contribute to local identity.” - consider that one of the ‘aims and actions’ should be amended as below: Identify and map areas of desirable separation between small settlements. In addition, I think it would be beneficial for an extra ‘aim’, for public bodies, to be added, stating: Identify and map existing areas of built development in larger settlements. The reason for this is that there are already built settlements/areas of Tunbridge Wells which are located within the AONB. It is important that these are identified and mapped and that key separations are recognised accordingly.  | S2 amended.              |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic     | Organisation or person  | Detailed comments  | AONB Responses  |
|-----------|-------------------------|--|---|
| Routeways | C.Brooks                | Early intervention preferable where routeways boundaries are in danger of collapse.  | Added to R1   |
| Routeways | Natural England         | Objective R1: In line with the first of the 'top five issues' it is suggested that indicator of success (i) for routeways should be changed to "Fewer public rights of way diversions on historic routeways."  | Agreed. Amended.  |
| Routeways | C.Brooks                | Supportive of the "top 5 issues", subject to recognition of safety issues associated with today's traffic volumes.   | Noted   |
| Routeways | Natural England         | The key characteristics rightly identify the geological and ecological value and potential of the AONB's historic routeways, alongside the opportunity to put people at the heart of the environment, impacting their health and wellbeing.  | Support welcomed  |
| Routeways | Ashford Borough Council | The importance of routeways as important landscapes feature was pioneered by the substantial research work undertaken by the High Weald AONB unit. ABC understands the key contribution these routeways make to the character and identity of the High Weald, and that these do not stop at the borders of this area, but connect throughout Ashford Borough. Routeways were key determining features in the colonisation of the High Weald environment and the establishment of settlements within the Ashford Borough. As with the rest of the Kentish High Weald, the specific tenurial arrangement during the early part of the Middle Ages whereby land rights belonged to estates in the north and the east of the county made it particularly important for ABC's Heritage Strategy to focus on Routeways as a discrete category of significant historic assets running cross the borough. Far-flung estates came to control a series of wood pastures, carved out of the Wealden commons. Their names came from the Early English term for wood pasture (denn) and those place names ending in 'den' reflect this. The "Wealden dens" are numerous in Ashford Borough, and include Rolvenden, Newenden and, although outside of the AONB, Tenterden. Tenterden, as | Support welcomed  |
| Routeways | Individual comment      | Objective R1: I do feel concerned about the traffic problem in approaching Heathfield from the east during the morning rush hour. The A265 and B2096 are both historic roads butg they do become very clogged up. Its not easy to think of a solution  | Noted   |
| Routeways | CLA                     | Objective R1 suggests the reduction of diversions. We would suggest that diversions of public rights of way are a necessary practice for enhancing land management and public safety and they should not be limited by any policy.   | Historic routeways are a fundamental and defining component of the High Weald's natural beauty with many pre-dating settlements. The Plan requires that their history be given great weight in decisions. |
| Routeways | CPRE - Tunbridge Wells  | R1 Public bodies could consider introducing an AONB-wide 40mph speed limit zone outside villages as provided for in paragraph 130 of Department for Transport Circular 1/2013. This AONB, being highly populated and with almost every parish in Kent complaining of excessive speeds of motor vehicles, would be especially suitable for this. A 40 mph limit outside villages would also encourage better compliance with the 30mph village speed limit as this would not seem so slow by comparison. The introduction should be combined with a publicity campaign urging people to drive slowly in the AONB so as to conserve and appreciate the AONB's special qualities.   | Added to OQ4  |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic     | Organisation or person   | Detailed comments   | AONB Responses                                     |
|-----------|--------------------------|---|--|
| Routeways | Kent County Council      | <p>Objective R1: to maintain the historic pattern and features of routeways.</p> <p>KCC supports the aims and actions identified. The text contains the aim to “support the retention and restoration of traditional fingerposts, boundary stones and turnpike features (e.g. milestone and toll houses)”. Features of this type are highly vulnerable to accidental damage. In Kent, many lie within land owned and managed by KCC but KCC is generally only aware of milestones (and not even all of these). It would be very helpful to survey the roads in the Kent part of the AONB so that historic features can be included on the HER and also flagged up to KCC as Local Highways Authority for Kent so that damage can, as far as possible, be avoided; further where it nonetheless happens, can be repaired more easily. KCC would be happy to discuss this potential area of work further.</p> <p>The text contains the aim to identify and protect above ground and below ground archaeology (including braided multiple ditch and back systems associated with braided tracks) in any works so as to not affect routeways. Again, to most effectively conserve these features, they should be added to the relevant HER. KCC would also recommend early discussion to ensure that a practical method of recording and data transfer is developed.</p> <p>The text also contains an aim to provide archaeological training for highway engineers and management contractors. This is an ambitious aim, as it would involve KCC as Local Highways Authority to be involved at an early stage. It is likely that the most effective way to involve highways contractors is through the development of effective systems – making sure they have relevant information in their management systems with appropriate guidance and advice. KCC requests involvement in discussions at an early stage for this area of work.</p> | Noted. Recommendation to add to HER included in R1 |
| Routeways | Mid Sussex DC            | Page 32 (Routeways) – The requirement to ensure that routeways are recognised as non-designated heritage assets in the planning process.  | Noted  |
| Routeways | Wealden District Council | Objective R1 Aim/Action 7 (page 32) - The Council has undertaken to compile a public record, or local list, of local non-designated heritage assets, during the plan period and whilst routeways are not specifically mentioned, they could form part of the assessment for this list.  | Noted and welcomed                                 |
| Routeways | CPRE - Tunbridge Wells   | <p>R1 Drive slowly in the AONB</p> <p>R1 Refrain from planting non-native species alongside routeways</p> <p>R1 Refrain from placing objects on roadside verges or from managing them as if they were gardens (e.g. by mowing them like lawns or turning them into rockeries)</p>   | Added to R2  |
| Routeways | C.Brooks                 | R1 and R2, consider need for environmentally sympathetic engineering solutions to repair and protect sunken routeway verges in particular.  | Noted. Considered in R1                            |
| Routeways | J. Petley                | Objective R2: communities could encourage greater awareness of the value of roadside verges for wildlife  | Added to R2  |
| Routeways | CPRE - Tunbridge Wells   | R2 Public bodies could require grass verges in new developments to be sown with a wildflower mix appropriate to the local soil conditions and managed accordingly   | Amendments made to R2                              |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic     | Organisation or person | Detailed comments  | AONB Responses  |
|-----------|------------------------|--|---|
| Routeways | James Eaton-Brown      | <p>Objective R2: Verges across the region are in crisis. Unsympathetic management over decades has had the result that japanese knotweed, himalayan balsam, winter heliotrope, rhododendron and cherry laurel are now dominant; on some routes this is all one sees along each verge for tens or hundreds of metres! The AONB organisation should seek to ally with Plantlife and insist highway departments repair and restore the biodiversity of road verges to their historical state rather than simply obliterating them with ride-on mowers and strimmers whenever the mood takes them.</p> <p>Litter across the region has gone from the absurd to being an actual joke. Councils should be given real powers to prosecute those seen fly-tipping or throwing litter from cars, and more widespread use of litter picking duties for those doing community service, and for those convicted of throwing litter from cars, should be used.</p> <p>Finally, hedge-laying is now all but a dead art. The dense hedgerows that used to line all routeways, consisting of species such as hawthorn, hazel, blackthorn, and dog-rose etc. have either been flayed to oblivion by mechanised tractors, ripped out all together, or worse still have been replaced by ***** cherry laurel because it is cheap and grows quickly. This is totally, entirely out-of-keeping with the historical nature of the AONB and is an unacceptable slow death for both the region's character and biodiversity. Considering how little work is actually required to plant and then lay a hedge when viewed over a time period of years, this situation is perplexing indeed. The AONB organisation should consult the South of England Hedge-Laying Society for guidance.</p> | R2 amended  |
| Routeways | Kent County Council    | Objective R2: to enhance the ecological function of routeways. Linking to the indicator of success of a proportion of designated wildlife verges with tailored management regimes, KCC recommends that any proportions stated should be expressed as a percentage to aim towards, with guidance provided to Local Planning Authorities on how to implement this.   | IoS describes a trajectory of change. R2 amended      |
| Routeways | Sussex Wildlife Trust  | <p>We strongly support the inclusion of objective R2 and the aims and actions listed. Whilst we understand that encouraging appropriate management should be prioritised for the most ecologically-rich road verges, the Sussex Wildlife Trust would like to see all road verges managed in a more ecologically appropriate way. Perhaps the final aim could have the following additional wording:</p> <p><b>'Provide ecological training for highway management engineers and contactors to ensure that all roadside verges within the High Weald are managed sensitively for biodiversity'</b></p>  | R2 amended  |
| Routeways | Natural England        | Objective R2: he concept of green infrastructure is embodied in the Governments Planning Policy Statements (PPS) 1 and 12 and is an essential component of good planning for urban and rural areas. In particular, green infrastructure is a key tool to create a resilient environment in the face of climate change, increasing connectivity of habitats. Routeways within the High Weald AONB provide opportunity for habitat connectivity across three counties. Objective R2: To enhance the ecological function of routeways and its rationale are welcomed, as is the Aim and Action for public bodies to "identify ecologically-rich historic routeways in biodiversity and green infrastructure planning."  | Support welcomed. GI added to introduction and Vision |
| Routeways | Individual comment     | I'm please that our distinctive black and white finger posts have been highlighted and recognised as significant. I'm glad too that Fly tipping has been mentioned. General dumping of litter is also a problem. I wish it were possible to ban 4x4s from narrow lanes. They are a pain In the neck and so mamny people have them  | Support welcomed.                                     |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic     | Organisation or person | Detailed comments   | AONB Responses   |
|-----------|------------------------|---|--|
| Routeways | Individual comment     | I find this text "Meeting the challenge of declining local government budgets for highway and rights of way maintenance which may exacerbate the impact of poorly informed management but offers opportunities for reducing the intensity of use along some roads;". This is the nearest text I have found relating to management of travelling densities. I recently commented on a local Planning Submission for building over 100 homes on the outskirts of Biddenden and referred to my own local driving experiences which included (a) often having to wait at T-Junctions for over 20 cars to pass before entry onto a main road can occur (Common Road/Sissinghurst A262 intersection), (b) being mostly unable now to overtake on our normal country two-lane A roads because of the high probability that oncoming cars will appear, removing any sensible thoughts of overtaking and causing traffic to travel in convoy behind the slowest vehicle, and (c) a recent personal car journey from Biddenden to the M20 beyond Leeds (A20 / M20 intersection) of 12 miles that took me over 1 hour to drive with no apparent reason apart from the heavy traffic. My suggestion is that a major section be added to the AONB Plan to encompass population density and the the relationship of this to the various infrastructure components, but especially for roads provision in advance of population increases. | Comment appreciated but the AONB Plan is not a local plan. Traffic and congestion added to OQ4 |
| Routeways | Individual comment     | For some odd reason, the footpaths around Mayfield are getting harder to negotioate this summer because of Brambles. The story of Sleeping Beauty comes to mind. I do not have the time or ability to get out there and prune – but is there a group of volunteers who do this kind of thing? Would it be helpful to publish the contact details of such a group? When in need?   | It is the landowners responsibility to keep visible and not obstruct footpaths.                |
| Routeways | Sussex Wildlife Trust  | The Sussex Wildlife Trust would like to see facts and figures that relate to biodiversity within the natural and cultural capital section for this characteristic. For example, the importance of 'wide flowery grass verges' is listed in the Key Characteristic, therefore the number of designated Notable Road Verges and roadside Local Wildlife Sites could be listed under the natural capital section. Similarly the number of veteran trees and size / length of roadside ancient woodland and hedgerow. This should act as a baseline against which to measure success.   | Noted  |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic    | Organisation or person          | Detailed comments   | AONB Responses   |
|----------|---------------------------------|---|--|
| Woodland | Individual comment              | Again, maximum use should be made of volunteer work parties   | Noted.   |
| Woodland | Woodland Trust                  | W1: Would like to see more emphasis on deer management, particularly as an objective for public bodies, including development of local markets for deer products etc  | Added to W4  |
| Woodland | Tunbridge Wells Borough Council | W1 Local Authorities cannot 'reject' development on the basis of unidentified risk. Either change 'reject' to 'resist' or "reject development that results in unacceptable loss or deterioration....."  | W1 amended.  |
| Woodland | Wealden District Council        | Objective W1 Aim/Action 2 (page 36) – The Council would question the terminology used here in terms of 'old growth secondary woodland'. It is unclear what is meant by this as this habitat type is not included within the list of habitats and species which are of principal importance for the conservation of biodiversity in England under S41 of the NERC Act 2006. Clarification over what is meant by this terminology, in terms of the habitat it is referring to, would be beneficial i.e. lowland mixed deciduous woodland. Objective W2 Aim/Action 2 (page 37) – It is not the responsibility of the Council to target and eradicate invasive species. Objective                                       | Identified in evidence. Added to glossary.   |
| Woodland | Sussex Wildlife Trust           | The Sussex Wildlife Trust strongly supports woodland being a listed characteristic contributing to the natural beauty of the High Weald and the objectives within this section. Given that much of the woodland in the south east is declining due to inappropriate or lack of management, we do think there needs to be recognition of the importance of woodland quality rather than just extent. Additionally there needs to be an ambition to reverse the losses that have already been experienced. Therefore, the Sussex Wildlife Trust would like to see objective W1 amended as follows:<br><b>'To maintain and enhance the existing extent and quality of woodland and particularly ancient woodland'.</b> | W1 concerns extent. Quality added to W2.   |
| Woodland | Sussex Wildlife Trust           | We recommend that an aim relating to encouraging appropriate management of woodlands is included for this objective. As a minimum all public bodies should be managing their own woodlands to benefit biodiversity and therefore the natural beauty of the High Weald in general.   | Ecological quality of woodland is not necessarily linked to intervention. For some woodlands neglect may improve ecological quality. Appropriate management added to W2  |
| Woodland | Natural England                 | Objective W1<br>Many of the gill woodland support a number of 'Atlantic' plants uncommon in Southeast-England and many only found in the Weald and the west of Britain. The following aim and action for others is recommended in support of conserving these features of interest: <b>Maintain existing gill woodland and enhance their quality for features of interest eg. 'Atlantic' plants.</b>  | Gill woodland added to W1  |
| Woodland | Individual comment              | All 4 WO -would benefit from closer cooperation with charity Woodland Trust be promoted as a means to encourage better conservation of the AONB woodland.   | Noted  |
| Woodland | Woodland Trust                  | W2: Would like to see an aim/indicator of success for ancient woodland restoration and would like to see an indicator of success around the buffering and linking of ancient woodland with semi-natural habitat, natural regeneration and or tree planting  | Added to W1  |
| Woodland | Tunbridge Wells BC              | W2 The wording does not accord with policy and would prefer it to say " Ensure a minimum 15m buffer zone to ancient woodland and veteran trees, seeking a greater buffer wherever possible and appropriate to protect from the detrimental effects of nearby development.<br><br>Unless these changes are made it might be difficult for LPAs to endorse this wording.  | CROW Act 2000, Section 84. confirms the powers of a local authorities to take 'all such action as appears to them expedient' to conserve and enhance the natural beauty of an AONB. Woodland is a key component of the AONB's natural beauty and protection of its ecological quality is paramount. However, these are indicators of intent and recognise constraints. W2 amended in part. |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic    | Organisation or person   | Detailed comments  | AONB Responses  |
|----------|--------------------------|--|---|
| Woodland |                          | Objective W2: The linking of existing areas of woodland is imperative. Much historical woodland within Wealden is no longer woodland at all; it is either now a forestry plantation of conifer and spruce, or is over-run with rhododendron and cherry laurel. All invasive and non-native species including Sycamore, Sweet chestnut where they are not part of a historically significant or active coppice, and all conifer species including larch, should be extracted and prevented from regeneration. Although native, Scots pine would not historically have been part of the Wealden biome and as should also be removed. They should be replaced with lime, ash, oak, beech, birch, wild service, and other native species. The Cross-in-Hand Amenities Society are the area-wide exemplar in the restoration of Wealden ghyll woodland and should be consulted by the AONB organisation. Keystone species such as wild boar should also be re-released.       | Noted. Issues covered in W2   |
| Woodland | Kent County Council      | Objective W2: to enhance the ecological functioning of woodland at a landscape scale.<br>KCC would like to raise concern with the indicator of success that states that “an increase in woodland dependent butterflies: Butterfly Conservation: Butterfly count”. KCC would like clarity on this point as to whether it is a measure of the number of species or individuals, or if it is the area of woodland which have woodland dependent species.  | To be led by Butterfly Conservation   |
| Woodland | Wealden District Council | W2 Aim/Action 3 (page 37) – As 15m is the minimum buffer zone set down in guidance by Natural England for protecting Ancient Woodland from the impacts of development, it is not reasonable to require a blanket approach to seeking buffer zones greater than this. As part of any development proposal, if it is clear that a larger buffer zone is required, then this can be addressed on a case-by-case basis. Objective W4 Aim/Action 2 (page 38) – The Council does not have the ability to offer incentives for using local wood or other materials in construction. Whilst Council tenders can list as a quality criterion a requirement for suppliers to make all necessary efforts to access local named sub-suppliers, Councils’ Procurement Policies do not allow Council officers to restrict the supplier market they engage with. In general comment, clarity over which public body/bodies are responsible for the Aims and Actions would be beneficial | CROW Act 2000, Section 84. confirms the powers of a local authorities to take ‘all such action as appears to them expedient’ to conserve and enhance the natural beauty of an AONB. Woodland is a key component of the AONB’s natural beauty and protection of its ecological quality is paramount. However, these are indicators of intent and recognise constraints. W 2 amended in part. |
| Woodland | Natural England          | An aim and action could be added addressing the establishment of a long-term ecological monitoring and research programme to assess the management status of woodlands and the impacts of diseases such as ash dieback, climate change and pressure from deer. The aims and actions for Objective W2 should make clear reference to the overarching need to get woodlands back into active management.<br>Further indicators of success are recommended in support of Objective W2:<br><b>Maintenance of species assemblages associated with good woodland management: judged against ecological baseline data for the High Weald and historic presence data (eg. SSSI Citations);</b><br><b>Increase in the proportion of planted ancient woodland being restored to deciduous woodland: currently &lt;32% of ancient woodland within the AONB is classified as PAWs; this could be reduced further.</b>  | Ecological quality of woodland is not necessarily linked to intervention. For some woodlands neglect may improve ecological quality. Appropriate management added to W2. Proposed IoS welcomed but in view of withdrawal of Natural England support for provision of monitoring data is resource dependent  |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic    | Organisation or person   | Detailed comments   | AONB Responses  |
|----------|--------------------------|---|---|
| Woodland | Kent County Council      | <p>Objective W3: To protect the archaeology and historic assets of AONB woodlands.</p> <p>The text contains the aim to require soil conservation and woodland archaeology training for woodland managers operating on public land, and for those receiving public grants for forestry machinery. To address this aim, KCC considers that it might be useful to review the actions and outputs of the Weald Forest Ridge project.</p> <p>The text contains an aim to require a basic non-invasive archaeological survey for woodlands affected by development. KCC is not fully supportive of this aim in its current format, as some development within woodlands may impact on important heritage assets. In these circumstances, a non-invasive survey might be inadequate mitigation and field assessment may be required. It might be better to phrase this aim as:</p> <p>“Require a desk-based assessment for all development within woodlands supported, where appropriate, by field assessment.”</p> <p>The text also contains an aim to include mapped historic environment data in licence agreements. KCC requests further clarity on this aim. As this aim will have consequences for HERs, including resource requirements, KCC requests that this be discussed at an early stage.</p> <p>Whilst the two actions suggested in “Example Actions for Others” are desirable, but it is not clear who would carry out the surveys mentioned. KCC would be happy to support woodland surveys with such data as the HER holds, provided that suitable methods can be developed for retuning enhanced data to the HER. Where the survey is carried out by commercial operators; however, there would need to be a charge levied for the data as with other commercial requestors.</p> | Noted. W 3 amended.   |
| Woodland | Wealden District Council | Objective W3 Aim/Action 2 (page 37) - There is no requirement in national planning policy for developments to undertake a non-invasive archaeological survey, basic or otherwise, for woodlands affected by development. Therefore, it is unreasonable to expect this to be required of developments.   | CROW Act 2000, Section 84. confirms the powers of a local authorities to take ‘ <i>all such action as appears to them expedient</i> ’ to conserve and enhance the natural beauty of an AONB. However, these are an indicator of intent and recognise resourcing constraints |
| Woodland | Woodland Trust           | <p>. Objective W4: Would like to see additional indicators of success such as ‘increase in woodland management, timber conversion and craft skills’, ‘increase in use of coppice product’ etc.</p> <p>Objective W4. Comment from Woodland Trust site manager: “One of the key issues is a lack of skilled forestry workers and very poor training apparent in new entries to the profession – this should probably be in that top list of 5 priorities. Its pie in the sky to talk about regenerating a timber industry locally if we don’t start with the basics – people who can actually cut down trees safely and efficiently and drive the machinery to get that timber out of the wood. At present local colleges are not producing students with the right basic qualifications or experience. This underpins all woodland management in the AONB.”</p>  | Proposed new IoS welcomed but no cost-effective mechanism to deliver these. Forest skills training added to W4. Critical issues of affordable housing and workspace for rural workes covered by LBE chapter   |
| Woodland | Individual comment       | Rather than advise to “avoid planting” in historic woodland – seek to ensure consultation with Woodland Trust or Environment Agency as to appropriate planting.   | W2 amended  |
| Woodland | Wealden District Council | Objective W4 Aim/Action 1 (page 38) – Whilst Council tenders can list as a quality criterion a requirement for suppliers to make all necessary efforts to access local goods & services, Councils’ Procurement Policies do not allow Council officers to restrict the supplier market they engage with.   | CROW Act 2000, Section 84. confirms the powers of a local authorities to take ‘ <i>all such action as appears to them expedient</i> ’ to conserve and enhance the natural beauty of an AONB. However, these are an indicator of intent and recognise resourcing constraints |
| Woodland | Individual comment       | You identify squirrels as an issue but no objective to combat the problem. I have witnessed the devastation they can do to established trees.They are a more significant problem than deer and on the increase around Ashdown Forest.   | Action added to W 4   |
| Woodland | Mid Sussex DC            | Page 37 (Woodland)– The requirement to carry out a basic non-invasive archaeological survey for woodland, fields or field boundaries affected by development.   | Noted   |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic     | Organisation or person  | Detailed comments  | AONB Responses  |
|-----------|-------------------------|--|---|
| Woodlands | Natural England         | Although the High Weald is a heavily wooded landscape the woodlands themselves are vulnerable to fragmentation, mismanagement, mammal damage and disease. All of these threats have been clearly identified within the 'top five issues' and Natural England support the High Weald AONB in addressing these. Recognising the importance of species associated with coppicing, including fritillaries, we suggest the following edit to the second bullet point from the 'top five issues' to:<br>- <b>Changing management, particularly the cessation of traditional coppicing effecting groundflora and species associated with coppicing such as fritillaries.</b>  | Issue amended   |
| Woodlands | CLA                     | We refer to the objectives W1, page 36, and would strongly suggest that rather than fencing ancient woodlands to keep livestock out, it would be more appropriate that livestock units are set at appropriate rates rather than removal of stock, as grazed woodland pasture is a valuable ecological habitat.<br><br>In addition, there is no mention of wildlife management – actively controlling deer and grey squirrel number through culling, to minimise damage to the woodland flora is vitally important to ensure the longevity of a healthy woodland.   | Extensive re-wilding programmes such as those practiced by Knepp may be an exception but currently significant and widespread damage to ancient woodland soils and ground flora is occurring as a result of livestock trampling. Deer and grey squirrel control added to W4 |
| Woodlands | CLA                     | CLA support the planting of trees for natural flood management and would want to see this added as an objective with the action to support and encourage landowners and farmers in doing so on their land  | Wet woodland added to W1 with focus on avoidance of harm to open habitats and preference for natural regeneration   |
| Woodlands | Ashford Borough Council | Given the late colonisation of the High Weald, the AONB in Ashford Borough retains a notably higher proportion of Ancient Woodland. Ashford's Planning Policy highlights Ancient Woodland as a particularly important rural feature (Tenterden and Rural Sites DPD Policy TRS18; Local Plan to 2030 Policy ENV5), thus supporting the Management Plan's objectives W1 and W2. The issue of rural fly tipping is particularly pernicious since such activity since it compromises the ecological value and landscape beauty of our rural areas, and particularly on our characteristic routeways. ABC works closely with Kent County Council, Trading Standards, the Environment Agency and Kent Police, ensuring a number of high-profile prosecutions for this offence. | Noted   |
| Woodlands | Individual comment      | W1/2/3/4: I absolutely support all these   | Support welcomed  |
| Woodlands | CPRE - Tunbridge Wells  | W2 Plant new native woodland, or allow woodland to expand naturally, in development schemes, especially where this will provide a buffer to ancient woodland.  | natural regeneration added to W1  |
| Woodlands | Individual comment      | I am pleased that the authors recognise the value and importance of the woodlands on the High Weald and the importance of conserving this feature for posterity  | Support welcomed  |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic         | Organisation or person   | Detailed comments   | AONB Responses  |
|---------------|--------------------------|---|---|
| Field & Heath | Wealden District Council | Objective FH1 Aim/Action 1 (page 41) – The Council would question the need for it to identify existing agricultural infrastructure, food processing and local farmers markets but would in general support these. Objective FH1 Aim/Action 2 (page 41) – Whilst the Council would seek to support local food growers, this cannot be done via Councils’ procurement policies.   | i) Delete 'identify' ii) Support for appropriate agricultural infrastructure and local food growers is critical to AONB conservation and was specifically noted as a foundation of the 1949 NP&C Act.   |
| Field & Heath | Sussex Wildlife Trust    | It is important to the Sussex Wildlife Trust that any agricultural production within the High Weald is as ecologically sensitive as possible. Whilst we acknowledge that objective FH1 caveats the agriculturally productive use of fields as part of 'sustainable land management', it is not made explicitly clear what this means. <b>We encourage the use of the Glossary to explain what the High Weald advisory committee considers to be sustainable land management especially in terms of wildlife-friendly farming. The importance of farming that conserves biodiversity is also missing from the aims for this objective. We recommend that an aim is included such as: 'Support farming practices that conserve and enhance biodiversity, contributing to the natural capital of the High Weald'.</b> We would also support aims that encourage public bodies to support public money for public benefit based schemes such as payment for ecosystem services. | A definition of 'sustainable land management' will be included in the glossary  |
| Field & Heath | Wealden District Council | Objective FH2 Aim/Action 2 (page 42) – Outside of allocated sites where hedges, field patterns and other boundary features have been identified for protection, creation and/or enhancement, the Council cannot require development masterplans to do the same.   | CROW Act 2000, Section 84. confirms the powers of a local authorities to take 'all such action as appears to them expedient' to conserve and enhance the natural beauty of an AONB  |
| Field & Heath | Wealden District Council | Objective FH3 Aim/Action 3 (page 43) – There is no requirement in national planning policy to identify, designate and appropriately manage species rich grassland road verges and it is unreasonable to require this undertaking of local authorities.  | CROW Act 2000, Section 84. confirms the powers of a local authorities to take 'all such action as appears to them expedient' to conserve and enhance the natural beauty of an AONB  |
| Field & Heath | Wealden District Council | Objective FH3 Aim/Action 6 – 8 (page 43) – There is no requirement in national planning policy to develop a species rich grassland inventory and it is unreasonable to require this undertaking of local authorities. This may occur through the production of a green infrastructure strategy, along with the identification of opportunities to restore and enhance degraded species rich grasslands, but this will be a matter for the Council to consider in its own right.   | CROW Act 2000, Section 84. confirms the powers of a local authorities to take 'all such action as appears to them expedient' to conserve and enhance the natural beauty of an AONB  |
| Field & Heath | Wealden District Council | Objective FH3 Aim/Action 12 (page 43) – It is not the responsibility of the Council to steer agri-environment schemes in the form of preparing landscape management design guides.  | CROW Act 2000, Section 84. confirms the powers of a local authorities to take 'all such action as appears to them expedient' to conserve and enhance the natural beauty of an AONB  |
| Field & Heath | Sussex Wildlife Trust    | The Sussex Wildlife Trust strongly supports the inclusion of objective FH3, however we feel that the indicators of success should encourage a net gain rather than just no net loss in lowland meadow. The amount of stored or newly created species-rich grassland, along with other priority habitats should be included as an indicator. We do strongly support the aims and actions for this objective.   | FH3 Add a second indicator - Increase in area and connectivity of species-rich grassland  |
| Field & Heath | Natural England          | Objective FH3: Objective FH3 refers to enhancing the ecological function of both field and heath, however the current indicator of success will only show if species rich grasslands have been lost. In order for the indicators of success to show if Objective FH3 has been achieved then they must cover the creation and enhancement of species rich grasslands, semi-improved grasslands and heathland. In addition, with respect to the complex mosaic of habitats described in Objective FH3, an indicator of success could observe increased connectivity across the High Weald.<br>Ponds within the High Weald are part of the complex mosaic of High Weald habitats, as discussed in Objective FH3. Natural England would welcome specific aims and actions which relate to pond restoration across the High Weald to benefit wildlife.   | i) FH3 Add a second indicator - Increase in area and connectivity of species-rich grassland ii) amend G1 to include water courses and water bodies  |
| Field & Heath | Wealden District Council | Objective FH4 Aim/Action 1 (page 44) - There is no requirement in national planning policy for developments to undertake a non-invasive archaeological survey, basic or otherwise, for any development affecting field or field boundaries. Therefore, it is unreasonable to expect this to be required of developments. In general comment, clarity over which public body/bodies are responsible for the Aims and Actions would be beneficial.  | i) CROW Act 2000, Section 84. confirms the powers of a local authorities to take 'all such action as appears to them expedient' to conserve and enhance the natural beauty of an AONB ii) the Aims and Actions are intended to provide an indication, but not an exhaustive list, of measures that would meet Management Plan objectives. |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic         | Organisation or person          | Detailed comments   | AONB Responses   |
|---------------|---------------------------------|---|--|
| Field & Heath | Natural England                 | Top five issues: The third of the 'top five issues' states that there has been a reduction in agri-environment funding. The change of scheme from Environmental Stewardship to Countryside Stewardship has resulted in some options having increased payments and others having decreased payments. As there has been no overall reduction in agri-environment agreement funding this statement can be adapted to reflect changes in option payment rates.  | Add ... for some operations  |
| Field & Heath | Natural England                 | Key characteristics: Whilst Ashdown Forest supports woodlark, woodlark is not one of the birds for which the SPA is classified. As such, Ashdown Forest is not deemed to support internationally important populations of woodlark, however it would form an important part of the bird populations protected by the SSSI designation   | Delete woodlark  |
| Field & Heath | Natural England                 | Facts and Figures: The bullet point: "Nearly 50% of AONB supported by government-funded schemes to encourage environmentally sensitive land management" uses data from 2013. Natural England advise that these figures be updated. Information on how to access Natural England's data can be found here: <a href="https://www.gov.uk/guidance/how-to-access-natural-englands-maps-and-data">https://www.gov.uk/guidance/how-to-access-natural-englands-maps-and-data</a> .   | tba  |
| Field & Heath | Individual comment              | Objectives FH1/3: This is a very simple one. Without the publishing of a code of best practice for land within an AONB, the AONB will (and is) become that in name alone. A widely publicised and enforced code for woodland, water systems, fields and the miniscule amount of the once widespread heathland which remains, would educate those who require it, change the fortunes of the AONB, meet the organisation's aims, and safeguard the little that is left.  | Add code to actions  |
| Field & Heath | Individual comment              | Objective FH1: At a national level, it would be good to encourage more people into farming. Brexit and our liberation from the EU's appalling CAP gives us a chance to reinvigorate our agricultural sector. Farmers need to be encouraged to produce food, not sell land for development   | Agree. FH1 supports productive use of land.  |
| Field & Heath | Horsham District Council        | Page 41 Objective FH1<br>"To secure agriculturally productive use for the fields of the High Weald, especially for local markets, as part of sustainable land management. Identify and support existing agricultural infrastructure, food processing facilities and local farmers' markets."  |  |
| Field & Heath | Tunbridge Wells Borough Council | FH1 Again not sure where horticulture comes from and without some definition this could be construed to be supportive of some potentially harmful developments. We have an application at present where a landowner wants to grow some vegetables in an isolated location on a very small plot in woodlands which requires raised beds, an access track, parking and a store, welfare facilities and fencing for something akin to large allotment plot – this could be considered small scale horticulture.  | W1 & 2 rejects any change, such as horticulture, which damages woodland extent or ecological function. Support for small-scale horticulture was identified as a key action by University of Reading in their report on food supply in the High Weald |
| Field & Heath | CLA                             | The CLA would promote the works done by farmers and land managers which have directly led to the character currently trying to be preserved.  | Support  |
| Field & Heath | CLA                             | CLA completely agrees with objective FH1 which seeks to secure agricultural productivity within the High Weald AONB. This should incorporate all farming and land use activities and should not be limited to small scale traditional practices but instead cover all agricultural and rural practices as it is essential that businesses are productive and profitable.  | The Plan supports productive agriculture which delivers sustainable land management  |
| Field & Heath | Horsham District Council        | Page 42 Objective FH2.<br>"Require development masterplans to protect and enhance existing field patterns including hedges, ditches or other boundary features, and where possible to restore them when lost."<br>It is suggested that the aim and actions should be widened to include the provision of these landscape features referred to above (hedges and trees, etc) to be retained within public open spaces. This is because when these end up in private gardens/ownership, there is very little scope to guarantee their maintenance, management and ultimately long term retention. | Add '... particularly within retained public open spaces'  |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic         | Organisation or person          | Detailed comments   | AONB Responses   |
|---------------|---------------------------------|---|--|
| Field & Heath | Tunbridge Wells Borough Council | <b>FH2 i) should this also include shaws?</b> If so can be added to actions.<br>ii) “no loss of medieval field systems” it is not clear what this means. Most surviving medieval field systems consist primarily of the boundary features and “systems” may be some features, collection of features or a wider landscapes. It is pointless to require preservation of something that is not defined a sit then cannot be used. A different approach that is more workable to ensure that such things are recognised and given full weight in any decision making process as you have done in the action. Perhaps “ <b>Recognition and conservation of medieval field systems and their constituent features as part of land management, land use changes and development decisions</b> ”   | Add definition of field systems from Historic England joint project 'Field Systems in the High Weald'  |
| Field & Heath | CPRE - Tunbridge Wells          | FH2 Strongly agree  | Support welcomed   |
| Field & Heath | Kent County Council             | Objective FH2: To maintain the pattern of small irregularly shaped fields bounded by hedgerows and woodlands. KCC supports all the actions identified.<br>One of the aims under this objective seeks to promote an inventory of Weald hedges and for this, it is suggested that the relevant HERs will need to be involved in such a project so that the information can be supplied to landowners and contractors. There will therefore need to be an appropriate method for transferring the information to HERs. KCC officers would be happy to discuss this further.  | Agree  |
| Field & Heath | Mid Sussex DC                   | Paragraph 115 of the NPPF requires that 'great weight' is given to conserving the landscape and scenic beauty in Areas of Outstanding Natural Beauty. However, Page 42 of the Plan requires that great weight is given to mediaeval field systems in planning decisions especially where there is a high degree of intactness and strong presence or relationship with other notable landscape and heritage features. This is clearly a more stringent and specific aim of the Plan, which is not supported by national planning guidance. While we acknowledge the importance of the medieval field systems, this Council believes it would be difficult to support giving great weight to them as set out in the Plan.<br>The above comments are provided in the spirit of constructive advice; we look forward to continuing to be a part of the High Weald AONB Partnership and working with you to progress the High Weald AONB Management Plan 2019-2024. | i) Support welcomed. ii) CROW Act 2000, Section 84. confirms the powers of a local authorities to take ' <i>all such action as appears to them expedient</i> ' to conserve and enhance the natural beauty of an AONB |
| Field & Heath | C.Brooks                        | FH2 & 3 – protection of hedgerows, an important contribution to the character of the High Weald landscape, repair re-plantign of derelict hedgerows to be encouraged.   | Agree, action included in FH2  |
| Field & Heath | Tunbridge Wells Borough Council | FH 3 i) This is very narrow and again is not easy to determine. Species richness can be depressed by current management practice and will often return with improved management on semi-improved neutral and acid grasslands. Suggest that yu seek further advice og grassland habitats in the High Weald from KWT and get a slightly wider defeinition. Perhaps no loss of wetland meadows and acid grassland but also an increase of neutral grassland classified as species rich and conserved through agri environment schemes and developments.  | Term approved by Weald Meadows Group. IoS i) identifies BRCs and HWJAC as leads to define and measure success  |
| Field & Heath | CPRE - Tunbridge Wells          | FH3 the indicators of success could include no loss of semi-improved grassland and no loss of lowland heathland FH3 Require boundary planting in new developments to be of native species and new verges outside Conservation Areas to be sown with a wildflower mix appropriate to the soil.   | i) Add IoS ii) No loss of lowland heath ii) Verge enhancement covered in Routeways R2  |
| Field & Heath | Kent County Council             | Objective FH3: To enhance the ecological function of field and heath as part of the complex mosaic of High Weald habitats. KCC is concerned with the indicator of success which seeks no loss of species in rich grassland and specifically how this will be measured, which will only be demonstratable if there are full details of existing grasslands.  | IoS i) identifies BRCs and HWJAC as leads to define and measure success  |
| Field & Heath | CPRE - Tunbridge Wells          | FH4 strongly agree  | Support welcomed   |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic         | Organisation or person | Detailed comments   | AONB Responses   |
|---------------|------------------------|---|--|
| Field & Heath | Kent County Council    | <p>Objective FH4: To protect the archaeology and historic assets of field and heath.</p> <p>The text contains an aim to require a basic, non-invasive archaeology assessment for any development affecting fields or field boundaries. KCC does not support this as currently stated, as some development affecting boundaries might impact on important heritage assets and the text may be read by applicants to imply that a basic survey is all that is required. In these circumstances, a non-invasive survey might be inadequate mitigation and field assessment may be required. It might be better to phrase this aim as follows:</p> <p>“Require a desk-based assessment for all development affecting fields or field boundaries supported, where appropriate, by field assessment.”</p> <p>The text contains the aim to promote field archaeology awareness and recognise the importance of historic small quarries, pits and ponds. KCC is supportive of this aim.</p> <p>The document also contains an aim to improve HERs for fields. It is not clear what this aim is intending to achieve and KCC would welcome further discussion on this matter.</p>   | Amend Action as suggested  |
| Field & Heath | Mid Sussex DC          | and Page 44 (Field and Heath) – The requirement to carry out a basic non-invasive archaeological survey for woodland, fields or field boundaries affected by development.   |  |
| Field & Heath | Individual comment     | <p>Whilst by no means the sole cause of the decline in biodiversity, much land that was once pasture or meadow has now ceased to be due to changes in management practice and evolving economic pressure. What had not been lost to plow or concrete mixer is in a laughable state. Livestock densities are far too high on some farms I shall not name, usually the same farms which have sought to ‘improve’ their fields as far as is possible for the growth of coarse grasses, in the process rendering them ‘green deserts’. But worse, the spread of equestrian facilities is doing at least as much damage to Wealden as the intensification of agriculture. Almost every week the Planning List released by WDC contains multiple applications for the erection of stables. Often run by those who evidently know nothing whatsoever of stock densities or sensible grazing regimes and apparently enjoy ‘playing country’ rather than employ their time usefully, I have all-too-often passed fields grazed almost to bare earth, full of miserable horses kept in tiny enclosures. Farming is, has always been, and shall always be part of the Wealden landscape and rightly so, but to see the countryside dying at the hand of those pursuing a mere leisure activity is heart-breaking. Finally, many fields local to me are not grazed at all and, instead of being used to make hay as was done until recent years, are now subject to indiscriminate mowing and topping by those with more obsessed with vintage tractors than possessed of common sense. Ostensibly performed in order to ‘keep dock and thistle down’, cuttings (and therefore nutrients) are never removed the problem and thus the perceived problem only ever gets worse! These fields are not gardens: rather they are (or should be) meadows and therefore subject to management regimes in line with historical precedent. <b>The simple act of leaving fields uncut and ungrazed between March and July/August, then cutting during fine weather, allowing those cutting to dry out and drop seed before their bailing and removal for hay, and then providing light grazing at low stock densities thereafter is what was done in Wealden for centuries, would provide income from hay sold to equestrians etc., and would, in one step, do more for biodiversity than any other single action.</b></p> | Action added to FH1 - 'Jointly prepare a best practice code for sustainable land management which reflects the particular character of the High Weald' |
| Field & Heath | Individual comment     | The decline in sheep and cattle farming is a concern  | Additional action added to FH1 to support pasture-fed livestock farming  |
| Field & Heath | Individual comment     | Encourage complementary landscape treatment in any new development.   | Action added to S3 'Reflect local landscape character and use local provenance species in new landscaping schemes'                                     |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic              | Organisation or person   | Detailed comments  | AONB Responses  |
|--------------------|--------------------------|--|---|
| Land Based Economy | Sussex Wildlife Trust    | The Sussex Wildlife Trust supports the vision within this section of the plan and are again pleased to see recognition of managing land for public benefit. We also strongly support the objectives within this section being framed by the need for all activities to conserve and enhance natural beauty along with enhancing the land-based economy and community life.   | Support welcomed  |
| Land Based Economy | Wealden District Council | Objective LBE1 Aim/Action 1 (page 47) – It is not within the Councils remit to invest in improving working conditions for land based businesses although such improvements would be supported if proposed.   | CROW Act 2000, Section 84. confirms the powers of a local authorities to take <i>'all such action as appears to them expedient'</i> to conserve and enhance the natural beauty of an AONB |
| Land Based Economy | Wealden District Council | Objective LBE1 Aim/Action 6 (page 47) – Councils are under a requirement from the Public Services (Social Value) Act to include, where possible, the provision of Social Value from a Contractor as part of the procurement tender. This can extend to asking suppliers to buy-local where possible (as private sector procurement is not regulated) as their Social Value contribution, but overall Council Procurement Policies are limited to how far we can enforce a buy-local policy due to heavy national/EU regulation of public sector procurement. | CROW Act 2000, Section 84. confirms the powers of a local authorities to take <i>'all such action as appears to them expedient'</i> to conserve and enhance the natural beauty of an AONB |
| Land Based Economy | Wealden District Council | Objective LBE1 Aim/Action 6 (page 47) – Councils are under a requirement from the Public Services (Social Value) Act to include, where possible, the provision of Social Value from a Contractor as part of the procurement tender. This can extend to asking suppliers to buy-local where possible (as private sector procurement is not regulated) as their Social Value contribution, but overall Council Procurement Policies are limited to how far we can enforce a buy-local policy due to heavy national/EU regulation of public sector procurement. | CROW Act 2000, Section 84. confirms the powers of a local authorities to take <i>'all such action as appears to them expedient'</i> to conserve and enhance the natural beauty of an AONB |
| Land Based Economy | CLA                      | The CLA strongly supports objectives LBE1 and LBE2 but would suggest that digital connectivity should also be mentioned in conjunction with infrastructure   | Support welcomed. Digital connectivity added to Aims and Actions  |
| Land Based Economy | Individual comment       | Objective LBE2: I do appreciate the relative tranquillity of the High Weald. Sustainable tourism yes, but we don't want hordes of people. Also, on a different note, affordable housing must be built on a modest scale and in a way that does not detrimentally affect the landscape. It's a difficult situation:- the house price/wage ratio is very high because people with money are prepared to pay more because this is such a lovely area in which to live, but this does pose a problem for people who work in the area but on low-wage jobs.       | Noted. OQ3 amended.   |
| Land Based Economy | Sussex Wildlife Trust    | We would like to see the same framing as is used for the land-based economy objectives for objective OQ3 as follows:<br>'To develop and manage access to maximise opportunities for everyone to enjoy, appreciate and understand the character of the AONB whilst conserving and enhancing natural beauty'.  | OQ3 amended.  |
| Land Based Economy | Sussex Wildlife Trust    | We strongly support the recognition that other qualities such as the dark night sky and tranquillity contribute significantly to the High Weald's natural beauty and are particularly encourage by the inclusion of objective OQ4.   | Support welcomed.   |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic              | Organisation or person  | Detailed comments   | AONB Responses                                       |
|--------------------|-------------------------|---|--|
| Land Based Economy | Ashford Borough Council | ABC is supportive of initiatives that will enable the effective ecological enhancement of the High Weald alongside the continued prosperity of land-based activity. We recognise that the High Weald landscape we experience today is also the product of human activity and that a number of rural trades are dependent on this area. ABC is demonstrably supportive of the sustainable development of its rural communities and regarding its high quality ecologically rich landscape character areas.<br>ABC is supportive of the range and details of other natural features worthy of note and relating to the High Weald AONB in this management plan. We are clear that the special qualities of this place are not limited to their landscape value, but extend to how they are used and their cultural associations | Support welcomed                                     |
| Land Based Economy | Individual comment      | Fully supportive especially to encourage more employment in land-related sector   | Support welcomed                                     |
| Land Based Economy | Individual comment      | We don't want the AONB to become a predominantly commuter area. Working from home should be more encouraged by the tax system. (I am a home-worker) It does make you feel more connected with the local community.  | Support for home-working added to LBE2               |
| Land Based Economy | Individual comment      | I'd love to see more village shops – including the reopening of shops in villages which don't have one  | Noted and included in LBE2                           |
| Land Based Economy | Natural England         | Land-based Economy and Related Community Life: enabling a sustainable economy and a profitable land-based business sector within the AONB is key to its future. Natural England therefore supports the inclusion of this chapter within the Plan. The chapter could make the connection to improving the understanding of the total, whole-life value of the natural assets of the AONB and their services as a separate objective. This would support the reference to building innovation in the chapter's vision and provide opportunity to develop new avenues for businesses to make sustainable use of the AONB's natural resources that strengthens the local economy.   | Support welcomed. Land based economy vision amended. |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic           | Organisation or person   | Detailed comments   | AONB Responses  |
|-----------------|--------------------------|---|---|
| Other Qualities | Individual comment       | Greater knowledge and awareness will assist compliance.   | Noted.  |
| Other Qualities | CPRE - Tunbridge Wells   | Walkers are well served with public footpaths but off-road riding and cycling routes are very limited, and are becoming inaccessible because of the volume of motor traffic on the roads which connect them   | Added to OQ3  |
| Other Qualities | Wealden District Council | Objective OQ1 Aim/Action 2 (page 50) – The Council would support AONB Welcome Packs if created and distributed by the High Weald AONB Unit.   | Support welcomed  |
| Other Qualities | Individual comment       | OQ1 and OQ2 - the need for greater promotion and education as to the existence, purpose and objectives of the AONB Management Plan  | Added to OQ1  |
| Other Qualities | CPRE - Tunbridge Wells   | Litter and flytipping detracts from the AONB landscape  | OQ1 amended   |
| Other Qualities | Wealden District Council | Objective OQ2 Aim/Action 3 (page 50) – It is considered that this should be an action for the High Weald OSG and JAC and not for individual authorities.  | Agreed - actions are for relevant public bodies                                 |
| Other Qualities | CPRE - Tunbridge Wells   | OQ2 Individuals and organisations to collect litter whenever it arises  | Noted   |
| Other Qualities | Individual comment       | OQ3: This reference to the large number of people living just outside the boundary of the AONB does give the impression that we're under siege! I'd hate to see too much tourism, especially if it means loads more cars on the road. I am pleased that stations on the Oxted-Uckfield railway line offer you an excellent leaflet informing you of interesting places within easy access of the different stations. Perhaps something similar should be produced for the Tonbridge-Hastings and Ashford-Hastings lines                       | Noted   |
| Other Qualities | Horsham District Council | Page 51 Objective OQ3<br>"To develop and manage access to maximise opportunities for everyone to enjoy, appreciate and understand the character of the AONB."<br>"Promote local distinctiveness in the visitor 'offer'."<br>"Support infrastructure and services including new off road cycling routes that improve access to visitor attractions from surrounding urban areas."  | Noted   |
| Other Qualities | CPRE - Tunbridge Wells   | OQ3 public bodies to encourage the provision of more bridleways, which allow access for horse riders and cyclists as well as walkers  | Riding added to OQ3   |
| Other Qualities | Wealden District Council | Objective OQ3 Aim/Action 3 (page 51) - It is considered that this should be an action for the High Weald OSG and JAC and not for individual authority   | Agreed - actions are for relevant public bodies                                 |
| Other Qualities | Natural England          | Other Qualities: Connecting health and the environment is a key priority for Defra, as detailed in their 25 Year Plan, and Natural England, as detailed in their Conservation 21 Strategy. The inclusion of reference to health and well-being within the vision is an important addition to the revised Management Plan. Natural England supports the aim and action under Objective OQ3 to "support landscape-inspired health and wellbeing initiatives" and suggest the inclusion of indicators of success which directly target this aim. | Support welcomed. No clear cost-effective and repeatable method to measure this |
| Other Qualities | CPRE - Tunbridge Wells   | OQ3 Landowners and developers to consider providing new bridleways  | Activity added to OQ3   |
| Other Qualities | Individual comment       | OQ4: can we help educate younger people about the value of dark skies, the views, the landscape, etc? I fear that the qualities which I and many others appreciate may not be recognised by some younger people   | Activity added to OQ1   |
| Other Qualities | Individual comment       | Objective OQ4 – as per comments. Actions would be:<br>To promote and support any Action groups; to pressure Dept of transport and other government bodies; to bring the aircraft noise/ air pollution issue to attention of all AONB councils etc and residents before it is too late; to Collect and communicate evidence that demonstrates the detrimental effect current aircraft routing and noise is having on the AONB; to Not Ignore it as it is only going to get worse.  | Noted. Add need to undertake further investigations to OQ4                      |
| Other Qualities | CPRE - Tunbridge Wells   | OQ4 public bodies to provide easily accessible information and guidance for residents on the value of dark skies and how to ensure that any necessary lighting is dark-sky friendly   | Noted, Action OQ4 amended.  |
| Other Qualities | Individual comment       | Supportive of the "top 5 issues" and the need to manage the protection, in light of increasing external pressures.  | Support welcomed  |

High Weald Management Plan 2019 - Public consultation statements and responses

| Topic           | Organisation or person | Detailed comments   | AONB Responses             |
|-----------------|------------------------|---|----------------------------|
| Other Qualities | Individual comment     | <p>Terms such as tranquillity, connection to the landscape, dark skies, promoting health and well being. These are all very important ambitions that are on the verge of extinction due mainly to Aircraft noise. A huge increase in the number and concentration of aircraft in the South East in recent years and the expansion of Heathrow and Gatwick is a huge, ever expanding threat to the AONB. It requires greater recognition in your objectives and some determined Actions. Over flying the relatively unpopulated High Weald at relatively low altitudes is a soft option for Gatwick as there are fewer complaints about noise. There is no consideration for the millions of people who come to visit and wish to enjoy the area. It needs bodies such as the AONB to stand up for the area and take action to mitigate this current, growing, blight to the quality of all aspects of the High Weald.</p> | Noted. OQ4 action amended. |