

High Weald AONB Joint Advisory Committee



Agenda

Wednesday 25 November 2020, 10.30am, by virtual meeting

1. Nature, health, and well being
A presentation by Marian Ashdown, Natural England
2. High Weald Walking Festival 2020
A presentation by Emma White, High Weald Communications Officer
3. Forestry Commission national strategy and the England Tree Strategy
A presentation by Craig Harrison, Forestry Commission
4. Healthy soil and Barn Owl Nest Box Project
A presentation by Ross Wingfield, High Weald Land Management Advisor
5. Apologies
6. Members' interests
Members and officers are invited to make any declarations of any interest that they may have in relation to items on the agenda and are reminded to make any declaration at any stage during the meeting if it then becomes apparent that this may be required when a particular item or issue is considered.
7. Urgent matters
Members are asked to raise any urgent matters at this stage and not at the end of the meeting. The Chairman will decide whether the JAC should discuss any items so raised but asks members to give her prior notification of such matters unless urgency prevents it.
8. Minutes of the Management Board Meeting
To note the matters arising from the Management Board meeting held on 14 October 2020 (page 3)
9. Minutes of the Officer Steering Group
To note the minutes of the last meeting of the OSG held on 30 September 2020 (page 8)
10. Draft revenue budget for 2021/22
To consider the draft revenue budget 2021/22 by the Treasurer, and agree it as a basis for consultation with contributing bodies (page 14); Appendix B: Core Budget Monitoring 2020/2021; Appendix C: Project Budget Monitoring 2020/2021
11. Planning Update
To note the appended work programme and responses to Government consultations on reforms to the planning system (page 20)
12. Risk management
To consider a report on the key risks (page 55); Appendix 1: High Weald JAC - Key Risks
13. Update on the work of the National Association for AONBs (NAAONB)
To consider a report on the work of the NAAONB (page 58)

14. A.O.B

To: ALL MEMBERS OF THE HIGH WEALD AONB JOINT ADVISORY
COMMITTEE

Samantha Nicholas
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Agenda item: 8

**HIGH WEALD JOINT ADVISORY COMMITTEE – Management Board
Minutes – 14 October 2020 at 10.30 am, Microsoft Teams Meeting**



Samantha Nicholas
Clerk to the High Weald AONB
Joint Advisory Committee

Present: **Members:**

Cllr Mrs Sylvia Tidy	East Sussex County Council (Madam Chairman)
Cllr Peter Bradbury	West Sussex County Council/Mid Sussex District Council
Mrs J Davison	Community Co-optee
Cllr J Vine-Hall	Rother District Council
Cllr P Dixon	Wealden District Council
Cllr M Balfour	Kent County Council

Also Present:

Sally Marsh	AONB Director (job share)
Jason Lavender	AONB Director (job share)
Claire Tester	AONB Planning Advisor
Gerry Sherwin	AONB Business Manager
Jennifer Hollingum	Mid Sussex District Council

Apologies

1. No apologies were received.

Members' Interests

1. There were no declarations of interest from the Members of the Management Board.

Minutes of the Management Board meeting held on 1 July 2020

2. The minutes of the last meeting, held on 1 July 2020, were agreed as a correct record.

Matters arising from the minutes

3. Referring to paragraph 34, Cllr Vine-Hall confirmed he had taken part in two meetings and he thanked Claire Tester for her contribution and for her advice on various consultations, which was instrumental in the final response.

Officer Steering Group update

4. Jennifer Hollingum reported that the recent Officer Steering Group (OSG) had been well attended by local authority officers from across the AONB, which was partly owing to the 'virtual' nature of the meeting. The officers have also met recently to discuss specific

issues such as the Biodiversity Net Gain requirements proposed in the government's Environment Bill.

5. The Design Guide is being used by some of local authorities. Rother District Council has recently adopted the guide as material consideration and Mid Sussex District Council are also looking to do so. There were several suggestions on how to promote the Design Guide to a wider audience including putting case studies on to the AONB Partnership's website and an awards programme recognizing good design.
6. A new sub-group of the OSG has been set up to consider major development proposals affecting the AONB. The implications of the government's Planning for the Future White Paper has also been discussed by the OSG.
7. Sally Marsh said the original principle behind biodiversity net gain was to provide biodiversity improvements elsewhere that could not be achieved on the development site itself. However, there are issues associated with biodiversity net gain such as the lack of baseline biodiversity data against which to measure success and the ease that the metric can be 'gamed' i.e. the procedure can be used to manipulate the system for a desired outcome. Sally Marsh asked the Members to ensure that local authorities have the resources to scrutinise the metric thoroughly but suggested as an alternative the AONB Unit may be well placed to support this and to coordinate this expertise.
8. The Members were pleased to hear that the Design Guide is being used. Cllr Tidy thanked the OSG for all the work they have undertaken this year.

Update on the community and landscape programmes

9. Gerry Sherwin provided an update on the AONB Unit's community and land management projects, which are summarised as follows:
 - This year Sussex Lund supported 70 landscape and conservation projects by providing £210,000 of funding to a range of individuals and groups across the AONB. Both AONB Land Management project officers have already begun site visits with prospective applicants to next year's Sussex Lund fund and the AONB Unit will continue to promote Sussex Lund 2021 throughout the autumn and the winter.
 - Farm and woodland site advice visits continued throughout the summer despite Covid 19 and more landowners and farmers continue to request advice and support. In response to Covid-19, the AONB Unit set up a WhatsApp group for the members of the Upper Rother and Dudwell farm cluster and this is proving very popular and helps to keep the members in touch with one another allowing them to work together and with the AONB Unit on collaborative projects.
 - Given Covid-19 the AONB Unit decided to run a series of online events, which have been well attended throughout the year. Early November will see the conclusion of a High Weald family farm succession planning event, which the AONB Unit has run in conjunction with the Prince's Trust.

- The AONB Unit has been approached by DEFRA to set up a 'Test & Trial' as a way of assessing the pilot elements of the government's intended new Environmental Land Management System (ELMS). The AONB Unit are looking at how to develop a landscape scale project in conjunction with the Upper Rother and Dudwell farm cluster and how it can be supported by ELMS.
 - The government very recently announced the launch the emergency fund 'Green Recovery Challenge Fund' in response to Covid-19 and to support parts of the environmental sector. Despite the extremely tight deadline, the AONB Unit is working with Plantlife to submit an application to this fund by the end of October.
 - Gerry Sherwin reminded Members that all the AONB partnerships put together and signed the 'Colchester Declaration' in 2019, which commits each AONB partnership to write and implement a Nature Recovery Plan for their area. Gerry has been supporting the National Association for AONBs (NAAONB) throughout the summer on several training/advice online seminars for AONB partnership staff. For the High Weald, the existing AONB Management Plan is already a nature recovery plan and the AONB Unit will be using and adding to this where necessary and to fill gaps and address any omissions.
 - Gerry informed the Members that a range of funding opportunities are being promoted at the moment with an emphasis on so-called 'shovel ready' projects. Unfortunately, many of these new grant programmes have short submission deadlines, which seriously compromises the AONB Unit's ability to submit effective projects that will achieve a lasting effect on the ground. To counter this, the AONB Unit is putting together a list of projects that may be able to take advantage of this type of funding at short notice.
 - The AONB Unit is currently writing guidance on responsible tree planting and new woodland creation and the siting of eco-campsites. With the closure of all schools, the High Weald Heroes primary school education project was put on hold during the spring and summer but with the return of children to school last month Rachel Bennington, the AONB Education Officer, has resumed both classroom and outdoor sessions with the children.
 - The AONB Unit decided not to cancel the successful High Weald Walking Festival by adapting it to a self-guided Festival to run throughout September. The AONB Unit and The Ramblers worked together to select 50 walks and make them available on the High Weald website and in an app format. The Walking Festival was very popular - there were 20,000 downloads for the walking routes and many positive comments via social media.
10. Gerry Sherwin outlined some of the projects planned for the next few months. The AONB Unit will build on its Dark Skies work with residents, Parish Councils and community groups to increase the understanding of and appreciation for the dark skies of the High Weald. The AONB Unit is also developing additional lighting guidance based on the South Downs National Park Authority's current policy document.

11. Cllr Vine-Hall informed the Members that Rother District Council has a strong dark skies policy for their Local Plan and that additional development in rural areas does have an increased adverse impact on dark skies Cllr Vine-Hall also commented on the excellent visit he had from Ross Wingfield to discuss potential land management and conservation projects for his land.
12. Cllr Tidy asked whether this is a good time to rejuvenate the Friends of High Weald. Gerry thought this would be a positive way to encourage a crowd funding source for those potential projects that benefit the public
13. Cllr Tidy asked how we ensure that local authorities are not planting trees inappropriately on species rich grassland and was referred to the AONB Unit's draft guidance on responsible tree planting and new woodland creation. It is hoped that local authority officers and others will be encouraged to follow this guidance in the High Weald
14. Cllr Bradbury was pleased to hear of the success of the Walking Festival which has raised spirits and he requested a copy of a media release to circulate among his contacts

.Update on recruitment and staff

15. Jason Lavender informed the Members that the AONB Unit has secured funding from the Environment Agency to appoint a Land Management Project Officer for three years to focus on natural flood management within the Low and High Weald part of the Cuckmere valley and this post will start in January
16. The AONB Unit has also recently recruited a new Landscape Research Officer, Sarah Brotherton, who will be joining the Unit at the beginning of November. This is a part-time position

White Paper – planning for the future

17. .Claire Tester outlined the key elements of the Planning White Paper:
 - A new simplified local planning system with a shortened timescale of 30 months;
 - The introduction of three zones - growth, renewal, and protected. It is not clear what development will be allowed in the protected zone;
 - Binding housing requirements based on the new calculation method but adjusted by constraints such as AONB;
 - A new standard method for calculating housing need: using this new method, the four local authorities Tunbridge Wells BC, Rother DC, Wealden DC and Mid Sussex DC which cover 75% of the AONB showed an 200% increase in housing numbers, over 2000 additional units compared to current Local Plans.
18. Cllr Bradbury supported the recommendations in the Glover Review that AONB partnerships should be given statutory consultee status. He informed the management Board that Huw Merriman, MP for Bexhill and Battle has written to the

Secretary of State asking to meet with various groups and representatives which will include the High Weald Partnership.

19. Cllr Dixon commented that the government's reform of planning is a top down approach and that it will prevent much community engagement and that the proposed timescales are too short to produce a local plan with proper consultation
20. Sally Marsh added that the intention to move over to machine-readable planning applications underpins the government's current thinking. It would mean the planning process will become a 'tick box' process based on the minimum amount of information and outsourced to a separate organisation and running the risk of far less scrutiny of development proposals.
21. Cllr Vine-Hall shared his concern that the government has based its housing numbers calculation on no real evidence and that the current housing numbers are no longer required.
22. Cllr Tidy commented that the numbers calculated are no longer required and there seems to be an undue concentration in the south east rather than in the Midlands and the north of England.
23. **Action: The AONB Unit will complete the final response to the consultation on the Planning for the Future White Paper by the 16th October and circulate this to the High Weald OSG should they wish to use it as part of their own individual consultation responses.**

JAC in November 2020

24. The next date for the JAC is on 25 November 2020. It was agreed to hold a virtual meeting

A.O.B

25. The CPRE Awards event is taking place online on the 14 October. The High Weald partnership's Design Guide and its High Weald Heroes school project are finalists
26. A paper copy of the Annual Review 2019/20 will be sent to all JAC Members

Agenda item: 9

High Weald Officer Steering Group

Notes of a meeting of the High Weald Officer Steering Group held on Wednesday 30 September 2020, at 10.00 am on Microsoft Teams



Samantha Nicholas
Clerk to the High Weald AONB
Joint Advisory Committee

PRESENT:

Jennifer Hollingum,	Mid Sussex DC (Chairman)
Diane Russell,	Rother DC (Vice-Chairman)
Virginia Pullan,	East Sussex CC
David Scully,	Tunbridge Wells BC
Helen French,	Sevenoaks DC
Natalie Bumpus,	Wealden DC
Kelly Sharp,	Wealden DC
David Greenwood,	Surrey CC
Bethan Hall,	Ashford BC
Richard Mosinghi,	Crawley BC
Vivienne Riddle,	Tandridge DC

High Weald Unit	
Claire Tester,	Planning Advisor
Sally Marsh,	Co-Director (Job Share)
Jason Lavender,	Co-Director (Job Share)
Gerry Sherwin,	AONB Business Manager

1. Apologies

1.1. Mark Daly, Kerry Culbert, Murray Davidson and Jenny Knowles

2. Minutes of the meeting of 5 February 2020

2.1. The Minutes of 5 February 2020 were agreed to be an accurate account of the meeting. The following actions were reviewed:

2.2. Paragraph 3.7, a Biodiversity Net Gain sub-group of the OSG has been formed and chaired by David Scully. Two meetings have been held, in May and September;

2.3. Paragraph 7.4, the additional meeting of the Design Guide sub-group was postponed owing to Covid 19.

3. AONB Unit work programme - land management and community outreach programmes and the High Weald Nature Recovery Plan

3.1. Gerry Sherwin provided a detailed update on some of the AONB Unit's work, which is summarised as follows:

- In response to the current Covid-19 situation the AONB Land Management Project Officers have moved the events and training programme online and set up a WhatsApp group for the Upper Rother and Dudwell farm cluster. Site visits have been resumed in line with the current guidelines to provide advice and guidance on regenerative agriculture, landscape and nature conservation, and potential applications to Sussex Lund and the Beautiful Boundaries (National Grid) grants;
- A range of new funding opportunities from a variety of sources are available for so-called 'shovel ready' projects. The AONB Unit is putting together a list of projects to help farmers and landowners develop a portfolio of projects that may be eligible for this type of funding;
- The AONB Unit has been approached by DEFRA to set up a 'Test and Trial' project to assess the pilot elements of the government's intended new Environmental Land Management System (ELMS);
- The AONB Unit decided not to cancel this year's High Weald Walking Festival because of Covid-19 but adapted it to a self-guided walking festival, which ran throughout September. Working with The Ramblers fifty walks were selected and made available on the High Weald website and in an app format. The festival was popular and there were 20,000 views of the walking routes;
- Work on Dark Skies with residents, parish councils, and community groups has continued and the AONB Unit is also developing additional lighting guidance based on the South Downs National Park Authority's current dark skies policy document;
- The AONB Unit is currently completing guidance on responsible planting, tree establishment and eco-campsites;
- This year Sussex Lund supported seventy landscape and conservation projects by providing £210,000 of funding to a range of individuals and groups across the AONB;
- The AONB Unit has secured funding from the Environment Agency to appoint a Land Management Project Officer for three years to focus on natural flood management within the Low and High Weald part of the Cuckmere valley and this post will start in January.

- David Greenwood informed the OSG that Surrey County Council has set up a land management framework and would welcome some input from the AONB Unit. The South Downs National Park Authority now has an ‘augmented reality’ Dark Skies Ranger. Bethan Hall reminded the OSG of Ashford Borough Council’s Dark Skies Policy and that it forms an important component of their policy portfolio.
- David Scully asked whether the tree planting guides will it be circulated for wider consultation. It has been drawn up in consultation with the Woodland Trust and will be made available to the OSG for their use.

4. Update on Biodiversity Net Gain

- 4.1. David Scully brought the OSG up to date with the recent developments of the Biodiversity Net Gain requirements proposed in the government’s Environment Bill. It’s expected the revised metric calculator will be published in December and the legislation is due next Spring and will be followed by a two-year implementation phase.
- 4.2. There followed a discussion on the issues associated with Biodiversity Net Gain and the particular problems of Metric 2.0 and some officers expressed a concern about the lack of baseline biodiversity data to measure success and the ease at which the metric can be ‘gamed’ i.e. using the procedures to manipulate the system for a desired outcome. Sally Marsh informed the OSG that the University of Kent presented their initial findings to the OSG working group on the aspirations Biodiversity Net Gain versus the reality on the ground.

5. Update on Design Guide adoption

- 5.1. The Chair asked the OSG which local authorities have adopted the Design Guide as a Supplementary Planning Document or as a material consideration.
 - Mid Sussex District Council is intending to adopt it as a material consideration and it is expected a report will be taken to its Cabinet soon;
 - Tunbridge Wells Borough Council is promoting it to property developers and hope to adopt it as material consideration. However, the Local Plan is the priority;
 - Wealden District Council development control officers are using the Design Guide at the reserved matters and design stages and they say it has been well received by property developers;
 - Rother District Council has adopted the Design Guide as a material consideration. Diane Russell was pleased to hear that the Guide is valued and being used by

some local authorities and she offered to circulate the report that went to the Cabinet recommending the adoption of the Design Guide.

- David Greenwood informed the Group that Surrey County Council's current Interreg Europe project was interested in the High Weald Design Guide. An online event will be held on 10th November and OSG members are welcome to attend.
- A discussion followed on how best to raise the Design Guide's profile in the future. Ideas included setting up a Design Guide annual award and publicising case studies.

5.2. Action: to consider whether there are any appropriate case studies and collate a list for future consideration by the OSG.

To be actioned by: officers and Unit

6. Major developments affecting the High Weald AONB

- 6.1. The Chair asked each of the officers present whether any major developments were being proposed in the AONB.
- 6.2. Rother district: a substantial development at Wakehams Farm at Fairlight but not considered by the district council to be major development;
- 6.3. Tunbridge Wells borough; major development at Turnden, which Natural England has asked the Secretary of State to call in. There are more potential major developments at Kingstanding Way, in the Pembury area, and an outstanding application at Hawkhurst for a golf course.
- 6.4. The Chair asked how different local authorities assess major development in the Local Plan and planning application process and whether there is an appropriate approach to inform these judgements. Claire Tester felt that a consistent approach to any methodology would be useful and suggested the OSG form a working group to consider this more closely.
- 6.5. Kelly Sharp explained that Wealden District Council is in the early stages of the new local plan and they would welcome further discussion with the AONB partnership on major development. The council is also moving towards 'sensitivity testing' and is developing an evidence base on significant harm to ensure a consistent approach.
- 6.6. Sally Marsh pointed out that although it is for the local authority to decide whether a development proposal is major or not, Footnote 55 of the NPPF requires the local authority to evaluate whether the development would have a

significant adverse impact on the purposes for which the area has been designated.

- 6.7. Action: To set up a sub-group with the local authorities most at risk from major housing pressure (Wealden, Tunbridge Wells, Mid Sussex, and Rother) and Natural England to discuss the appropriate methodologies for assessing whether a development is major and whether it meets the tests set out in NPPF paragraph 172 –
To be actioned by:CT**

7. General discussion on the proposals for the future of the planning system

7.1. Claire Tester outlined the AONB Unit's draft response to the consultation on the 'White Paper – planning for the future' and asked for any comments the OSG might have to be sent to her in enough time to meet the consultation deadline on 1st October.

7.2. Jennifer Hollingum asked whether the Glover Review recommendations might have a bearing on this White Paper. Sally Marsh has discussed this with the National Association for AONBs but there seems to be very little joint effort between the government departments on this. It is important to note the protected area status proposed in the White Paper does not improve the current situation and the zoning approach it proposes is crude and far too simplistic.

- 7.3. Action: Wealden District Council to circulate their response to the consultation on the White Paper – planning for the future to the members of the OSG
To be actioned by KS**

- 7.4. Action: Where appropriate OSG members to send Claire Tester an alternative contact for the AONB response to the White Paper –
To be actioned by officers**

- 7.5. Action: The draft AONB response to the consultation on the White Paper to be sent to the members of the OSG
To be actioned by CT**

8. Update on local authority training

8.1. Claire Tester and Sally Marsh ran a series of AONB training events for local authority Members and officers throughout the year until last March and visited many local authority offices to promote and raise awareness of the AONB Management Plan and the Design Guide. Although Covid-19 has meant the suspension of this work, the AONB Unit has developed an online presentation for

local authorities and this can be used as part of an induction for new officers and Members.

**8.2. Action: The link to the webinar will be circulated to the officers as it is placed on the AONB private Youtube channel
To be actioned by CT**

9. Items for Management Board (14 October 2020)

9.1. Response to the White Paper Consultation – Planning for the Future. -

10. AOB

10.1. Claire Tester let the OSG know that the communication with local authority case officers has significantly increased recently and this is welcome, and she asked the OSG to encourage their teams and colleagues to contact her for guidance on AONB matters.

11. Date for next Meeting

11.1. February 2021, precise date to be confirmed.

Agenda Item: 10

Committee:	High Weald AONB Joint Advisory Committee
Date:	25 November 2020
Title of Report:	Draft Revenue Budget 2021/22
By:	Treasurer to the Joint Advisory Committee
Purpose:	To consider the draft Revenue Budget 2021/22 and agree it as a basis for consultation with contributing bodies

RECOMMENDATIONS

The Joint Advisory Committee is recommended to approve:

1. the draft budget for 2021/22; and
 2. the commencement of budget consultation with the local authorities and Defra.
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FINANCIAL APPRAISAL

- 1.1. A draft budget for 2021/22 is attached in Appendix B. It is recommended that the draft budget be approved as a basis for consultation with contributing bodies/authorities.
- 1.2. A balanced core budget has been drafted for 2021/22. This has been achieved through a planned drawdown of £6,700 from the JAC reserves.
- 1.3. There are a number of key financial issues and risks which are detailed in this report.
- 1.4. Following consultation with contributing bodies/authorities, a final budget for 2021/22 will be presented to the Joint Advisory Committee (JAC) for approval at its March 2020 meeting.

2. CONTEXT

- 2.1. The draft budget should be considered within the following context:

Countryside and Rights of Way Act 2000

- 2.2. The JAC carries out statutory duties on behalf of local authorities under the Countryside and Rights of Way Act 2000. These statutory duties are set out in Appendix A of the report. Despite reductions in public spending, and the subsequent savings that have to be made, it is important that the core funding of the JAC

remains sufficient to deliver statutory duties in a co-ordinated way that offers excellent value and maximises opportunities for efficiency.

- 2.3. It should be noted that local authority contributions in the region of £116,500 in 2021/22 are likely to generate additional funds for core activities and projects of at least £639,500.

Defra Core Funding	£232,500
Other Core Income	£ 9,800
Defra Projects Funding	£ 45,000
Non-Defra Projects Funding	<u>£352,200</u>
Total External Funding	£639,500

Local Authority Funding	£ 83,700
Local Authority Projects	<u>£ 32,800</u>
Total Local Authorities	£116,500

Total contributions **£756,000**

The High Weald Unit's Work Plan 2021/22

- 2.4. The budget has been developed to support the implementation of the Unit's rolling work plan.

High Weald JAC Memorandum of Agreement (MoA)

- 2.5. The budget has been developed within the context of the Service Level Agreement 2019-2020 which has been signed by each local authority and High Weald JAC's host authority, East Sussex County Council.

Defra Contribution

- 2.6. The budget has been developed within the context of the 25-Year Environment Plan and the Glover Review recommendations. Defra's contribution to AONB Partnerships for 2021/22 has yet to be advised but the interim advice is that Defra's contribution to the High Weald AONB JAC's budget in 2021/22 will be maintained at 2020/21 levels. It has been assumed that the Defra contribution will be the same as 2020/21 at £277,500.

High Weald JAC Budget 2020/21

- 2.7. The forecast outturn for 2020/21 is a surplus of £4,200 arising from increased income from hosting and managing partnership projects. The forecast reserve at 31st March 2021 is £185,700.

3. FINANCIAL ISSUES

- 3.1. The draft budget is presented to the JAC for consideration. Appendix B shows the Core Budget and Appendix C shows an indicative Project Budget. A break-even budget for 2021/22 is presented.
- 3.2. The draft budget assumes an allocation of the Defra contribution between core and projects of 83.78% to core and 16.22% to projects. The draft budget assumes that local authorities commit to maintain their contributions at the 2020/21 level.
- 3.3. If the Defra grant is at a different level to the assumed figure, or the partner authorities contributions are not sustained at the level then the draw on reserves will need to be adjusted accordingly in order to maintain a balanced position.
- 3.4. Whilst the use of reserves is a legitimate financial decision, this will only be sustainable for a limited period without further remedial action being required. This may include a review of the expenditure budgets to look for savings and efficiencies, or a review of the income required from partners to continue supporting the operation at the desired level.

Core Budget – Expenditure

Summary

- 3.5. Inflation has been applied at rate of 2% for staff and 0% for all other costs.
- 3.6. The budget is a standstill budget.

Staff Costs

- 3.7. The draft budget allows for a small core team of 5.1 FTE: Director (1.1FTE); Business Manager (0.8FTE); Strategic Planner (0.8FTE); Landscape Advisor (1FTE); Communications Officer (0.6FTE), Team Support Officer (0.8FTE); and an allowance for finance support.
- 3.8. The budget increase reflects the higher grading of the vacant post) following job evaluation, an increase of £2,500.
- 3.9. Staff costs are also subject to inflation of 2%, amounting to a £4,200 increase.
- 3.10. The budget assumes contributions to the East Sussex Pension Fund of 17.60% in 2021/22.

Accommodation/Office Equipment

- 3.11. The budget covers the cost of office rent and maintenance, office running costs, office supplies and software licences.

3.12. The budget increase reflects the rising costs of most goods and services, in particular software licences.

Partnership running costs and support services

3.13. Partnership running costs includes the NAAONB membership fee and the costs associated with JAC meetings, representing the partnership at regional and national forums, producing the annual review and PR costs.

3.14. The reduced budget assumes virtual events will continue into 2021/22 and there will be savings on meeting venues and refreshments.

3.15. Support service costs is a standstill budget that includes ESCC IT, personnel and financial support and the annual lump sum contribution of £4,400 into the ESCC pension scheme. Costs assume the JAC's clerk service will continue to be provided by the High Weald JAC's Team Support Officer.

Core Budget – Income

Summary

3.16. The draft budget shows contributions from local authorities at the same level as 2020/21. The proportion of the Defra contribution allocated to the core budget has been maintained to balance the core budget.

Defra

3.17. The 2021/22 core contribution is assumed in this report to be £232,500 which is the same as it was for 2020/21.

Local Authority Contributions

3.18. The draft budget assumes no inflationary increase to the core contributions of local authorities and assumes that they will commit to maintain contributions at the 2020/21 level.

Other Contributions

3.19. The draft budget assumes other contributions to the core budget of £9,800 from charges to projects for management, administration and office costs.

Core Budget - Reserves

3.20. The JAC reserves at 31st March 2022 are estimated to be £179,000, a reduction of £6,700 from 31 March 2021. The JAC continues to consider ways of reducing costs or increasing income. Office relocation, reduced working hours and redundancies remain options for reducing costs. Allocating a greater % of the Defra contribution

towards core services and focusing on contracts/projects that contribute towards management and administration costs remain options for increasing income.

Self-Funding Projects

- 3.21. The indicative Self-funding projects budget is attached at Appendix C. The Partnership's project budget is presented as 4 programmes; Community Engagement (including High Weald Heroes); Management Plan Research and Evidence; Landscape Enhancement; and Project Development.
- 3.22. The project budget allows for 3.2FTE project officers: Land Management Project Officers (2.6FTE) and an Education Officer (0.6FTE).
- 3.23. Local authority contributions are primarily those made in prior years through the Project Enabling Fund or to specific projects, for example High Weald Heroes.
- 3.24. The indicative budget reflects the Committee's role in managing non-government grants landscape enhancements on behalf of Sussex Lund and National Grid. In July 2020 Management Board members approved new grant awards of £226,395. The budget also includes the new, Environment Agency funded, Cuckmere and Coombe Natural Solutions Project.
- 3.25. National Grid, Sussex Lund and the Environment Agency will make annual contributions towards running the Schemes (approximately £7,000, £25,000 and £34,000 per annum respectively). A proportion of these contributions will cover the costs of core staff time managing and administering the Schemes, indicated in 'other income' in Appendix B. The balance is used to fund the Partnership's land management project officers to support potential and successful applicants, enabling project success.
- 3.26. The majority of grant awards are paid retrospectively on project completion. The self-funding projects budget and outturn is therefore indicative as some external partner's project completion dates are unpredictable.
- 3.27. The Defra grant contribution allocated to Partnership Projects is £45,000.

4. FINANCIAL ISSUES 2021/22 AND BEYOND

- 4.1. Between 2011 and 2015 the annual Defra contribution reduced by £71,020. Between 2016 and 2019 the contribution increased by £13,647. The contribution in 2020/21 was increased by £3,830 but with a requirement that £17,500 be spent on biodiversity action. As yet there is no formal advice on likely contributions beyond April 2021.
- 4.2. A balanced position has been achieved for 2021/22 by drawing down £6,700 from reserves, assuming local authorities maintain their core contribution at the 2020/21

level. This figure will be adjusted accordingly when there is more certainty around the income assumptions outlined in this report.

- 4.3. The Defra contribution is conditional on match funding equivalent to 25% of the core funding in cash terms being secured from local authorities, such that Defra funding does not exceed 75% of the total Defra and local authority contribution. Maintaining match funding levels is therefore essential.
- 4.4. The JAC continues to consider ways of reducing costs or further increasing other income. Allocating a greater % of the Defra contribution to core costs and office relocation remain options for balancing the budget.
- 4.5. The JAC needs to retain a minimum reserve of £95,000 to meet redundancy costs.

5. RISKS

- 5.1. The risks and financial implication that the JAC will wish to note are that the core budget for 2022/22 assumes that:
 - Defra continues to protect National Park and AONB funding, and maintains its contributions to the High Weald JAC at at least 2020/21 levels.
 - Local authorities maintain their core contributions at the same level as 2020/21 to provide the cash match required to meet Defra requirements.
 - Employer's pension costs for 2021/22 will be 17.60%.
 - Salary inflation for 2021/22 is estimated at 2%.
 - Woodland Enterprises Ltd do not require the High Weald JAC to contribute to any additional one-off building maintenance costs.
 - That business rates will not be reintroduced.

6. CONCLUSIONS AND REASONS FOR RECOMMENDATIONS

- 6.1. The JAC should note that the draft budget contains a number of budget assumptions which may be affected by the financial environment created by Brexit and Covid-19.
- 6.2. The Management Board continues to consider savings options, and alternative contribution sources, so that a balanced budget can continue to be achieved.
- 6.3. The draft budget for self-financing projects assumes operation of four programmes in 2021/22.
- 6.4. Support for the draft budget will provide the JAC with the capacity to deliver most of its core functions in 2021/22.



Jill Fisher -Treasurer to the High Weald AONB Joint Advisory Committee

Appendix A

Statutory purpose of the High Weald AONB

The designation of the High Weald as an Area of Outstanding Natural Beauty (AONB) places several statutory duties on local authorities under the Countryside and Rights of Way Act 2000:

- **Section 82** affirms the primary purpose of AONBs to conserve and enhance natural beauty
- **Section 84** confirms the powers of local authorities to take all such action expedient to achieve the conservation and enhancement of natural beauty
- **Section 85** places a duty on all public bodies and statutory undertakers to *have regard* to the purpose of conserving and enhancing natural beauty. This duty is in addition to the power under section 84 (above)
- **Section 89** creates a statutory responsibility for local authorities to produce and review AONB management plans, where appropriate acting jointly. Management Plans formulate the local authorities policy for the management of the AONB and for the carrying out of their functions in relation to it.

These duties are principally discharged through the High Weald AONB JAC, acting jointly on behalf of the local authorities, although they apply to all council functions and activities where they affect the use of land, in the AONB.

Actual FORECAST OUTTURN 2019/2020, BUDGET 2020/21 AND INDICATIVE BUDGET 2021/22

£'000	<u>2020/21</u>		<u>2021/22</u>				<u>2022/23</u>		
	<u>Budget</u>	<u>Forecast</u>	<u>Original</u>	<u>Budget</u>			<u>Indicative</u>		
			<u>Budget</u>	<u>Inflation</u>	<u>Pressures</u>	<u>Other</u>	<u>Budget</u>	<u>Budget</u>	
Actual <u>Core Budget</u>	£'000	£'000	£'000	£'000	£'000	£'000	£'000		
Expenditure									
237.9	Staff costs	251.3	251.3	251.3	4.2	0.0	2.5	258.0	266.8
31.8	Accommodation/office equipment	31.5	31.5	31.5	0.0	0.0	2.8	34.3	35.0
8.8	Partnership running costs	11.5	11.5	11.5	0.0	0.0	(2.8)	8.7	8.9
31.7	Support services	31.7	31.7	31.7	0.0	0.0	0.0	31.7	32.3
310.2	Total Core Expenditure	326.0	326.0	326.0	4.2	0.0	2.5	332.7	343.0
Income									
232.5	Defra	(232.5)	(232.5)	(232.5)	0.0	0.0	0.0	(232.5)	(232.5)
22.4	East Sussex County Council	(22.4)	(22.4)	(22.4)	0.0	0.0	0.0	(22.4)	(22.4)
9.0	Kent County Council	(9.0)	(9.0)	(9.0)	0.0	0.0	0.0	(9.0)	(9.0)
9.3	West Sussex County Council	(9.3)	(9.3)	(9.3)	0.0	0.0	0.0	(9.3)	(9.3)
2.9	Surrey County Council	(2.9)	(2.9)	(2.9)	0.0	0.0	0.0	(2.9)	(2.9)
7.2	Wealden District	(7.2)	(7.2)	(7.2)	0.0	0.0	0.0	(7.2)	(7.2)
7.2	Rother District Council	(7.2)	(7.2)	(7.2)	0.0	0.0	0.0	(7.2)	(7.2)
5.6	Mid Sussex District Council	(5.6)	(5.6)	(5.6)	0.0	0.0	0.0	(5.6)	(5.6)
6.7	Tunbridge Wells Borough Council	(6.7)	(6.7)	(6.7)	0.0	0.0	0.0	(6.7)	(6.7)
4.7	Horsham District Council	(4.7)	(4.7)	(4.7)	0.0	0.0	0.0	(4.7)	(4.7)
3.6	Sevenoaks District Council	(3.6)	(3.6)	(3.6)	0.0	0.0	0.0	(3.6)	(3.6)
0.8	Ashford Borough Council	(0.8)	(0.8)	(0.8)	0.0	0.0	0.0	(0.8)	(0.8)
1.5	Hastings Borough Council	(1.5)	(1.5)	(1.5)	0.0	0.0	0.0	(1.5)	(1.5)
2.2	Tandridge District Council	(2.2)	(2.2)	(2.2)	0.0	0.0	0.0	(2.2)	(2.2)
0.3	Crawley Borough Council	(0.3)	(0.3)	(0.3)	0.0	0.0	0.0	(0.3)	(0.3)
0.3	Tonbridge and Malling Borough Council	(0.3)	(0.3)	(0.3)	0.0	0.0	0.0	(0.3)	(0.3)
16.3	Other income	(9.8)	(14.0)	(9.8)	0.0	0.0	0.0	(9.8)	(9.8)
332.5	Total Core Income	(326.0)	(330.2)	(326.0)	0.0	0.0	0.0	(326.0)	(326.0)
22.3	Surplus/(deficit) transfer to/(from) reserve	0.0	4.2	0.0	(4.2)	0.0	(2.5)	(6.7)	(17.0)
0.0	Net Core Budget	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Self Funding Projects

See Appendix C for detail

338.7	JAC expenditure on self-funded projects	339.3	392.5	430.0			430.0	430.0
41.1	Defra contribution to self-funded projects	(45.4)	(50.0)	(45.0)			(45.0)	(45.0)
	Local authorities contributions	(35.4)	(14.2)	(32.8)			(32.8)	(32.8)
	Other contributions to self-funded projects	(258.5)	(328.3)	(352.2)			(352.2)	(352.2)
379.8	Net Self-Funded Project Budget	(0.0)	0.0	0.0			0.0	0.0

Total High Weald JAC

712.3	Total core and project expenditure	665.3	718.5	756.0	4.2	0.0	2.5	762.7	773.0
712.3	Total core and project income	(665.3)	(722.7)	(756.0)	0.0	0.0	0.0	(756.0)	(756.0)
0.0	Total High Weald JAC Budget	(0.0)	(4.2)	(0.0)	4.2	0.0	2.5	6.7	17.0

Defra Funding	2020/21	2021/22	2022/23	Reserves	£000
	£000	£000	£000		
Defra funding on core budget	(232.5)	(232.5)	(232.5)	Reserves at 1 April 2020	181.5
Defra funding on projects budget	(45.4)	(45.0)	(45.0)	Transfer to/(from) reserves 2020/21	4.2
Total Defra Funding	(277.9)	(277.5)	(277.5)	Transfer to/(from) reserves 2021/22	(6.7)
				Reserves at 31 March 2022	179.0

	Budget 2020/21			Forecast 2020/21			Indicative Budget 2021/22		
	Exp	Income	Net	Exp	Income	Net	Exp	Income	Net
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
1 Community Outreach									
JAC expenditure	9.7			2.4			9.7		
Defra		(8.6)			(2.4)			(8.6)	
Local authorities		(0.4)			0.0			(0.4)	
Other		(0.7)	0.0		0.0	0.0		(0.7)	0.0
High Weald Heroes									
JAC expenditure	25.6			25.8			26.6		
Defra		(12.8)			(12.9)			(13.3)	
Heritage Lottery Fund		0.0			0.0			0.0	
Local authorities		(12.8)			(12.9)			(13.3)	
Other		0.0	0.0		0.0	0.0		0.0	0.0
2 Management Plan Evidence and Guidance									
JAC expenditure	12.9			5.5			12.0		
Defra		(12.9)			(5.5)			(12.0)	
Other		0.0	0.0		0.0	0.0		0.0	0.0
3 Landscape Enhancement									
JAC expenditure	285.1			358.8			375.7		
Defra		(11.1)			(24.2)			(11.1)	
Defra (ELMS advocacy)		0.0			(5.0)			0.0	
Environment Agency		(4.5)			(21.2)			(34.0)	
Water Catchment Partnership (KWT)		(3.8)			(4.0)			(4.0)	
Local authorities		(16.2)			(1.3)			(13.1)	
Other		0.0			(6.0)			(34.0)	
Countryside Stewardship Facilitation Fund		(30.8)			(25.1)			(30.8)	
National Grid		(93.7)			(123.8)			(93.7)	
Sussex Lund (Charities Aid Foundation)		(125.0)	0.0		(148.4)	0.0		(155.0)	0.0
4 Project Development									
JAC expenditure	6.0			0.0			6.0		
Defra		0.0			0.0			0.0	
Natural England		0.0			0.0			0.0	
Local authorities		(6.0)	0.0		0.0	0.0		(6.0)	0.0
JAC expenditure (to Appendix A)	339.3			392.5			430.0		
Expenditure funded by Defra (to Appendix A)		(45.4)			(50.0)			(45.0)	
Expenditure funded by LAs (to Appendix A)		(35.4)			(14.2)			(32.8)	
Expenditure funded by Other (to Appendix A)		(258.5)			(328.3)			(352.2)	
TOTAL JAC expenditure/income	339.3	(339.3)	0.0	392.5	(392.5)	(0.0)	430.0	(430.0)	0.0

High Weald Joint Advisory Committee

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Working together to care for one of England's finest landscapes

Agenda item: 11

1st October 2020

Ministry of Housing, Communities and Local Government
Emailed to TechnicalPlanningConsultation@communities.gov.uk

Changes to the Current Planning System Consultation

Standard method for assessing local housing need – Questions 1-5

The document proposes a revised standard method for calculating local housing need which will be used as the basis for plans created prior to any changes outlined in Planning for the Future being introduced. Will also be part of the process for setting any binding housing requirement. However, this consultation does not set out how this binding requirement would be calculated. Main reason for revision is to meet the Government's target of 300,000 new homes per annum. Achieved by adding into the formula the existing stock (assuming an increase of minimum of 0.5%) and removing the previous cap. Impacts on High Weald LPAs below:

Local Authority (% in AONB)	Adopted Local Plan dpa	Current Method	Proposed Method
Ashford (14%)	1,093	970	1,211
Crawley (1%)	340	476	598
Hastings (18%)	215	451	453
Horsham (7%)	800	920	1,715
Mid Sussex (49%)	964	1,114	1,305
Rother (83%)	335	736	1,173
Sevenoaks (16%)	165	711	820
Tandridge (4%)	125	646	533
Tonbridge & Malling (0.4%)	425	843	1,440
Tunbridge Wells (69%)	300	678	893
Wealden (53%)	450	1,225	1,199

The Litchfields map below illustrates the impact of the proposed new standard method of calculating housing need on England and its disproportionate impact on the South East, including the High Weald. The Atlas of Rural Settlement map shows the correlation of areas affected by high increases in housing numbers with dispersed settlement areas whose rural architectural character is dominated by a

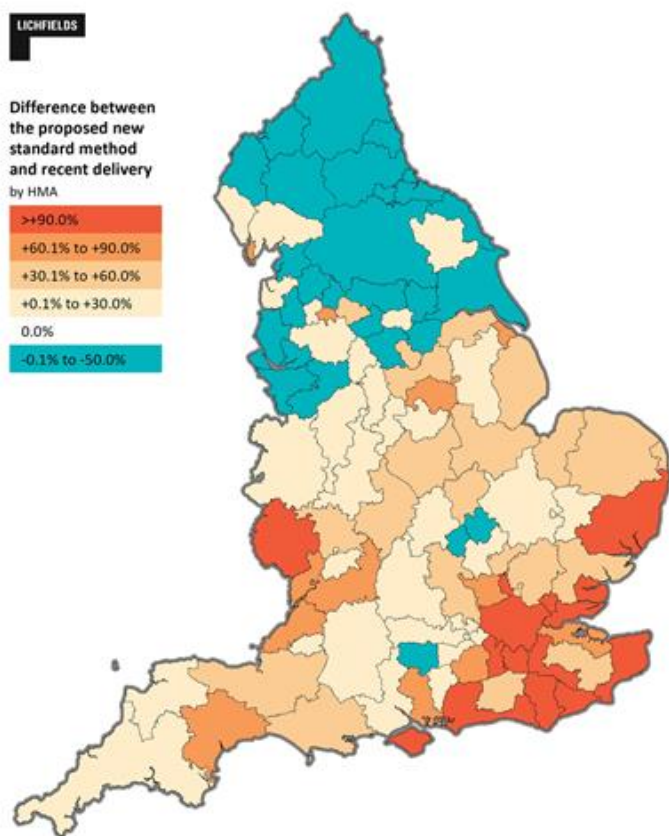
Anglesey
Arnside and Silverdale
Blackdown Hills
Cannock Chase
Chichester Harbour
Chilterns
Clwydian Range
Cornwall
Cotswolds
Gower
Cranbourne Chase and Dee Valley
West Wiltshire Downs
Dedham Vale
Dorset
East Devon
Forest of Bowland
Howardian Hills
High Weald
Isle of Wight
Isles of Scilly
Kent Downs
Lincolnshire Wolds
Llyn
Malvern Hills
Mendip Hills
Nidderdale
Norfolk Coast
North Devon
North Pennines
North Wessex Downs
Northumberland Coast
Quantock Hills
Shropshire Hills
Solway Coast
South Devon
Suffolk Coast and Heaths
Surrey Hills
Tamar Valley
Wye Valley



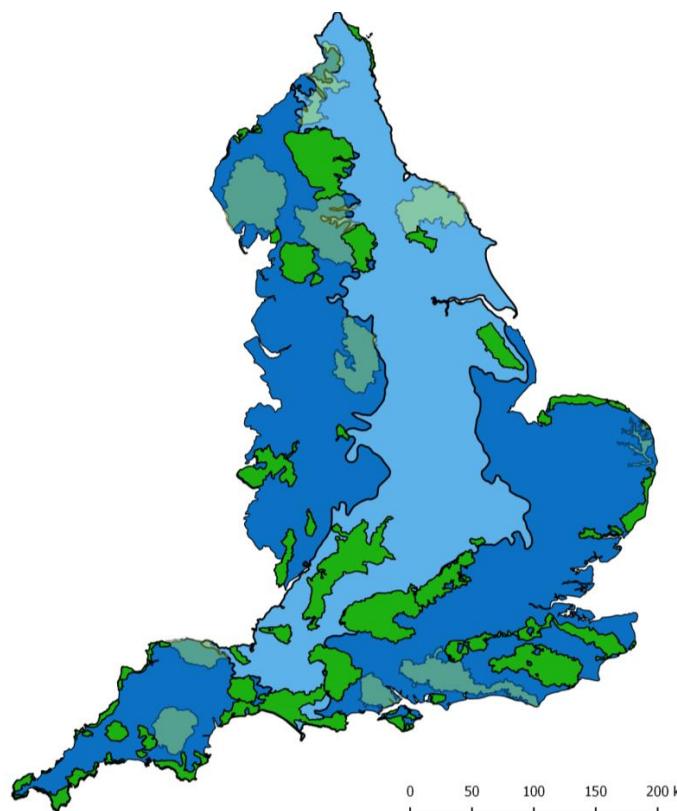
high density of dispersed historic farmsteads and smaller villages. The distinctive character of these places is likely to be harmed by large-scale generic housing development.

A high proportion of the countryside in these areas may be more anciently enclosed with smaller fields, abundant hedgerows and a greater proportion of semi-natural ancient woodland. The structural diversity and intimate mix of habitats, coupled with a high proportion of small-scale farming, represent a socio-ecological system which has the potential to produce food in a more climate resilient way and support high levels of biodiversity. Both capacities are vulnerable to large-scale housing development.

Areas identified for increases in housing numbers of above 30% include large areas of AONBs and National Parks – England’s finest landscapes. In the South East, where the proposed changes increase housing numbers in general by over 90% compared with current delivery, our finest national landscapes cover over one-third of the land area. The formula’s approach of perpetuating past trends that focus growth in London and the South East puts inordinate pressure on some of England’s finest landscapes, threatening the natural beauty and landscape character for which these areas were designated.



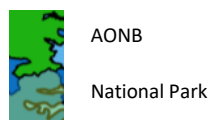
Litchfields <https://lichfields.uk/grow-renew-protect-planning-for-the-future/how-many-homes-the-new-standard-method/>



Roberts and Wrathmell: Atlas of Rural Settlement

Dispersed settlement landscapes to the east and west dominated by a high density of individual farms (darker blue) and the ‘central province’ dominated by village landscapes (lighter blue)

Fig.1 Comparison of proposed increases in housing numbers with rural settlement character and distribution of national landscapes



The proposed standard method for assessing local housing need over-simplifies a complex relationship between housing need, affordability and landscape capacity. The formula should be revisited. Landscape capacity – that is consideration of what is valued in a place and its sensitivity to change – should be applied to all landscapes; applied at a fine-grained scale and factored in at the start of the process for assessing housing numbers, rather than at the end as a mitigating factor.

From the publication date of the revised PPG, authorities which are already at the second stage of the strategic plan consultation process (Regulation 19) are given 6 months to submit their plan to the Planning Inspectorate for examination. Authorities close to publishing their second stage consultation (Regulation 19), should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan and a further 6 months to submit their plan to the Planning Inspectorate.

Recommendation to Government

The formula should be revisited to achieve the Government’s housebuilding aspirations in a way that is more evenly distributed across the country and supports the economic prosperity of northern towns and cities. Perpetuating past trends that focus growth in London and the South East puts inordinate pressure on protected landscapes which threaten their landscape character and the purposes for which they were designated.

First Homes and the Affordable Housing Threshold – Questions 11, 16 & 22

It is proposed to replace 25% of currently required affordable housing with ‘First Homes’. These are homes available to buy at a minimum of 30% discount from open market price. These would replace the highest value affordable homes required under existing Local Plan policies (such as shared-ownership or affordable rent). It is also proposed to replace the current NPPF policy for entry-level exception sites with First Homes exception sites and to remove the site size restriction in footnote 33.

It is also proposed to replace the current minimum threshold for affordable housing of 10 units with 40 or 50 units to support SME builders. This would be a temporary measure to support delivery during the downturn resulting from Covid-19.

These proposals are not currently intended to apply in AONBs. The exemptions in the current NPPF for ‘designated rural areas’ in relation to affordable housing thresholds and entry level exception sites are proposed to continue and the substitution of First Homes for intermediate affordable homes does not apply in these areas. ‘Designated rural areas’ are defined in the NPPF glossary as National Parks, Areas of Outstanding Natural Beauty and areas designated as ‘rural’ under Section 157 of the Housing Act 1985. The latter is a rather random selection of small settlements outside of protected

landscapes which are excluded from the 'right to buy', the nearest of which to the High Weald are in Chichester district.

However, Action with Communities in Rural England (ACRE) is campaigning to change these exemptions so they apply to all communities of 3,000 or less. This may mean that some larger villages/towns within the High Weald AONB do become subject to these changes such as Battle, Cranbrook, Hawkhurst, Wadhurst, Ticehurst, Rotherfield, Mayfield and Forest Row.

Community land trusts and social housing providers have demonstrated that affordable homes can be provided economically on smaller sites in rural areas. These provisions are particularly important for rural communities. Rural landscapes require land-based workers to manage them – to produce food and materials, enhance natural processes and ecosystem function, and manage public access to land for health and wellbeing. Many rural land-based jobs provide insufficient income to allow workers to live in the landscapes they manage. A pause on the provision of affordable housing on small sites, even temporarily, will adversely impact rural communities and in turn threaten land management and provision of nature-based recreation.

Recommendation to Government

In the event that the exemptions are broadened out to include all settlements of up to 3,000 population, the exemptions for England's finest landscapes (AONBs and National Parks) should remain so that the larger settlements in these areas continue to be exempt. Higher rents and house prices in these protected areas means that there is a significant need for accommodation for those who cannot afford open market rents or house prices. Some of these will be land-based sector workers who manage the landscapes and help to conserve and enhance their natural beauty.

Permission in Principle – Question 24

Local authorities currently have the power to grant Permission in Principle to suitable sites allocated on registers of brownfield land and minor development (i.e. small sites that support fewer than 10 dwellings).

The Permission in Principle consent route has two stages:

- the first stage ("Permission in Principle") establishes whether a site is suitable in-principle for development. Applicants only required to identify site and type of use with range of number of units. This grant of Permission in Principle is for five years and no planning conditions can be attached to it;
- the second ('technical details consent') stage is when the detailed development proposals are assessed, and conditions can be attached. S106 agreements and CIL also apply at this stage.

A grant of Permission in Principle plus a grant of technical details consent together equates to full planning permission. The first stage has a 5-week determination period and the 14-day period for consultation with the public and statutory consultees (advertised electronically). The second stage has 10 weeks for major development and 5 weeks for other forms of development (unless an

application is subject to an Environmental Impact Assessment in which case a 16 week limit applies). Consultation is only be with those who have requested it at stage 1.

It is proposed to remove the restriction in the current Permission in Principle regulations on major development. This will enable applications for Permission in Principle to be made for all scales of housing led development. In theory this does not apply to EIA or HRA developments, but in practice a blanket HRA can be applied to development and EIA either screened out or required at stage 2.

There is no exemption proposed to these changes within AONBs. In the absence of any supporting environmental information such as LVIAs and ecological reports - the only information provided being a line around a site and the number of units proposed - local authorities will not be able to carry out their legal duty to have regard to conserving and enhancing AONBs (Section 85 of the Countryside and Rights of Way Act 2000) which requires assessing impact on the protected landscape and the purposes for which it was designated.

The impact on vulnerable landscapes outside of designated areas may also be considerable. Information on the historic environment, landscape character, ecological value and local public perceptions is not necessarily available from existing sources and without access to commissioned studies, local authorities may not be in a position to make informed and evidenced decisions. The inevitable impact will be inadvertent damage to the landscape legacy of the past, and the landscape resilience of the future.

Recommendation to Government

It is considered that local authorities will not be able to carry out their legal duty to have regard to conserving and enhancing the AONB if the only information provided is a line around a site and the number of units proposed. In the absence of any supporting environmental information it will not be possible to properly assess the impact on a protected landscape or the purposes for which it was designated. It is therefore considered that any extension of permission in principle to major development should not apply in AONBs.

Yours sincerely,

Claire Tester MRTPI

Planning Advisor, High Weald AONB Unit

Advising on the management of a nationally important landscape, part of our Natural Health Service

Background Information about the High Weald AONB



The High Weald was designated in 1983 as an Area of Outstanding Natural Beauty. It is an exceptionally beautiful medieval landscape covering 564 square miles across the counties of East and West Sussex, Kent and Surrey.

The High Weald AONB Joint Advisory Committee is a partnership established in 1989 of 15 local authorities, Defra, Natural England and organisations representing farming, woodland, access and community interests. The JAC is responsible for publishing and monitoring the statutory AONB Management Plan. The JAC is supported by a small, dedicated staff team, the High Weald AONB Unit, which provides advice on how to conserve and enhance the AONB. The advice provided by the AONB Unit assists public bodies and statutory undertakers to meet their duty as set out in Section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of AONBs in making decisions that affect it.

Unlike National Park authorities, the High Weald AONB Unit is not a statutory body but an advisory one. It is not a local planning authority and the responsibility for determining planning applications remains with the 15 local authorities. The AONB Unit is not a statutory consultee on planning matters and it remains each local planning authority's decision whether or not they seek its advice on a particular planning application.

The scope of the advice in this letter is set by the statutory High Weald [AONB Management Plan](#), which has been adopted by all partner authorities, as 'their policy for the management of the area and for the carrying out of their functions in relation to it'.



Planning for the Future White Paper High Weald AONB Partnership Response

<https://www.gov.uk/government/consultations/planning-for-the-future>

Consultation by MHCLG, expiry 29th October 2020

Emailed to planningforthefuture@communities.gov.uk

The following response broadly follows the questions asked in the consultation but does not include questions that are not relevant to the Partnership's objectives of conserving and enhancing the AONB. In some cases the questions have been abridged to remove inaccurate or leading elements.

General comments

The three main messages are as follows:

1. The three zone system proposed is too simplistic. Protected areas like AONBs will need some small scale, organic growth to support their communities and Growth and Renewal areas will need some protected parts for nature recovery and green spaces for health and wellbeing. A more nuanced approach will be needed to achieve sustainable and healthy places.
2. The binding housing requirements for local planning authorities must be based on evidence of landscape character and capacity rather than the application of a formula, especially where they have a large proportion of AONB.
3. The planning reforms should incorporate the relevant parts of other Government workstreams such as the Glover Review recommendations on planning and the Environment Bill proposals for nature recovery and biodiversity net gain.

In September 2019 the Landscapes Review into National Parks and AONBs led by Julian Glover was published. A response to this review by Government is still awaited. Proposal 6 in the Review was:

"A strengthened place for national landscapes in the planning system with AONBs given statutory consultee status, encouragement to develop local plans and changes to the National Planning Policy Framework".

The High Weald AONB Partnership strongly supports these recommendations and would wish to see them incorporated in any planning reforms.

On Monday 28 September 2020 the Prime Minister announced that he intends to protect 30% of the UK's land for nature by 2030. The Government press release confirms that existing National Parks, Areas of Outstanding Natural Beauty and other protected areas already comprise approximately 26% of land in England, but an additional 4% – over 400,000 hectares – will be protected to support the recovery of nature. This commitment is very welcome but will be ineffective if the existing Areas of Outstanding Natural Beauty are

required to take the volume of new development indicated by the new standard method for calculating housing need. The proposals in the White Paper to adjust these figures to account for constraints such as AONB are welcomed, and the Partnership looks forward to future engagement on how these constraints will be applied. It recommends that there should be a robust, evidence-based approach which takes into account landscape character and capacity rather than the application of a formula.

Responses to Questions

Question 3 - How would you like to find out about plans and planning proposals in the future?

Digital means of publicising plans and planning proposals in the area should be used but not at the expense of paper methods. People should not be barred from engaging in the planning system just because they don't have digital capabilities. In a rural area such as the High Weald AONB many people do not have access to the internet or have very slow internet speeds which make uploading documents impractical. Others, especially older people, may not have the expertise or desire to engage digitally. In making the planning system more accessible to those who do have digital capabilities, it must not leave behind those who don't.

The proposals do not make it easier for local people to contribute their views. The stated ambition that more democracy will take place at the plan-making stage with a radically and profoundly re-invented engagement with local people can only be fulfilled if sufficient time, resources and expertise are made available to local authorities at this early stage. The proposals fail to ensure this.

We would like to be engaged, and we would like our local communities to be engaged, through participative engagement processes (as championed by the Building Better Building Beautiful Commission), which require trained facilitators able to reach all sectors of the community, and with time to explore evidence, seeks views and build consensus. Simply viewing an online plan is no substitute.

Question 5 - Do you agree that Local Plans should be simplified in line with our proposals?

No, the proposed zonal system is too simplistic. Planning is about more than housing and separation into only three zones does not reflect the complexity that is necessary to plan new or renewed places. It also does not reflect the fact that 'protected areas' like AONBs will need some development to support their communities and land management. Also, growth and renewal areas will need green infrastructure, open green spaces, nature recovery areas and some direction about the location of different types of development to ensure that needs are met and any development creates or enhances sustainable communities and quality of life. In reality these three zones will have to be broken down into many sub-areas to be useable as a land-use planning system which will reduce the simplicity proposed.

Question 6 - Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?

No because different areas will have different issues and priorities, and this reduces the opportunity for more innovative and locally specific policies such as policies on tranquillity, dark night skies and ecosystem services. Whilst a suite of national policies (worded as legally binding policies not woolly guidance as per the current NPPF) would be useful to avoid every plan having to include very similar policies, there should also be the ability for Local Plans and Neighbourhood Plans to have additional or varied policies where justified by local circumstances.

Question 7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?

We await further detail on the new consolidated sustainable development test. Although sustainable development is a much-used term, it is open to multiple interpretations. It is essential that the new system uses the internationally accepted Brundtland definition namely: ‘Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.’ It is also not clear how compliance would be evaluated if Sustainability Appraisals are to be abolished. Whilst not perfect these do at least provide a consistent methodology for assessing plans against the whole spectrum of sustainability impacts not just the narrow approach often used by planners of whether users of a development can access facilities without use of a private car.

Sustainable development is not about striking a balance between environmental, social and economic objectives, but about maximising positive outcomes across all three at the same time. To achieve this requires a fundamental re-think in the Government’s approach to plan making. The current proposals privilege housing development over other land uses. Plan-making should be integrated, holistic and positive, seeing the natural and built environment characteristics as integral to place making across all landscapes and valuing other land uses such as healthy food production and nature recovery equally alongside housing requirements. A sustainable development test should reflect consideration of all these aspects.

7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

The Duty to Cooperate has failed to deliver on cross boundary strategic issues. Bringing back a higher tier of plan making, or a strategic process, would make local plan preparation significantly quicker and more efficient. Indeed, the current planning system could be much improved by the introduction of such a change without the need to bring in a whole new planning system.

The most difficult cross-boundary issue for local authorities to solve has been the distribution of housing numbers. The White Paper proposes to remove this issue from local planning authorities and suggests that the requirement for each local planning authority will be set centrally, based on the new standard method of assessing housing need adjusted for constraints. No detail is provided as to how these numbers will be set, what methodology will be used or how anyone will be able to input to the decision.

A process should be put in place to establish the right numbers for each local planning authority which allows interested bodies and individuals to submit evidence and have it heard by an independent body such as the Planning Inspectorate. This process could also take into account other cross-boundary matters such as the need for strategic infrastructure and make binding requirements for inclusion in Local Plans. The two issues cannot be separated out because the provision of infrastructure may facilitate or be paid for by an increase in housing provision.

8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?

The standard method proposed in the accompanying paper ‘Changes to the Current Planning System’ disproportionately affects London and the South East whilst decreasing numbers in the north. Both the household projections and the affordability part of the formula just perpetuate the situation where most economic growth is focused in London and the South East. This is also an area where there is a high concentration of AONB, National Park and Greenbelt. The consequence of the numbers coming out of the standard method for this area puts huge pressure on these protected areas. The table below shows the consequences for the LPAs with land in the High Weald AONB.

Local Authority (% in AONB)	Adopted Local Plan dpa	Current Method	Proposed Method
Ashford (14%)	1,093	970	1,211
Crawley (1%)	340	476	598
Hastings (18%)	215	451	453
Horsham (7%)	800	920	1,715
Mid Sussex (49%)	964	1,114	1,305
Rother (83%)	335	736	1,173
Sevenoaks (16%)	165	711	820
Tandridge (4%)	125	646	533
Tonbridge & Malling (0.4%)	425	843	1,440
Tunbridge Wells (69%)	300	678	893
Wealden (53%)	450	1,225	1,199

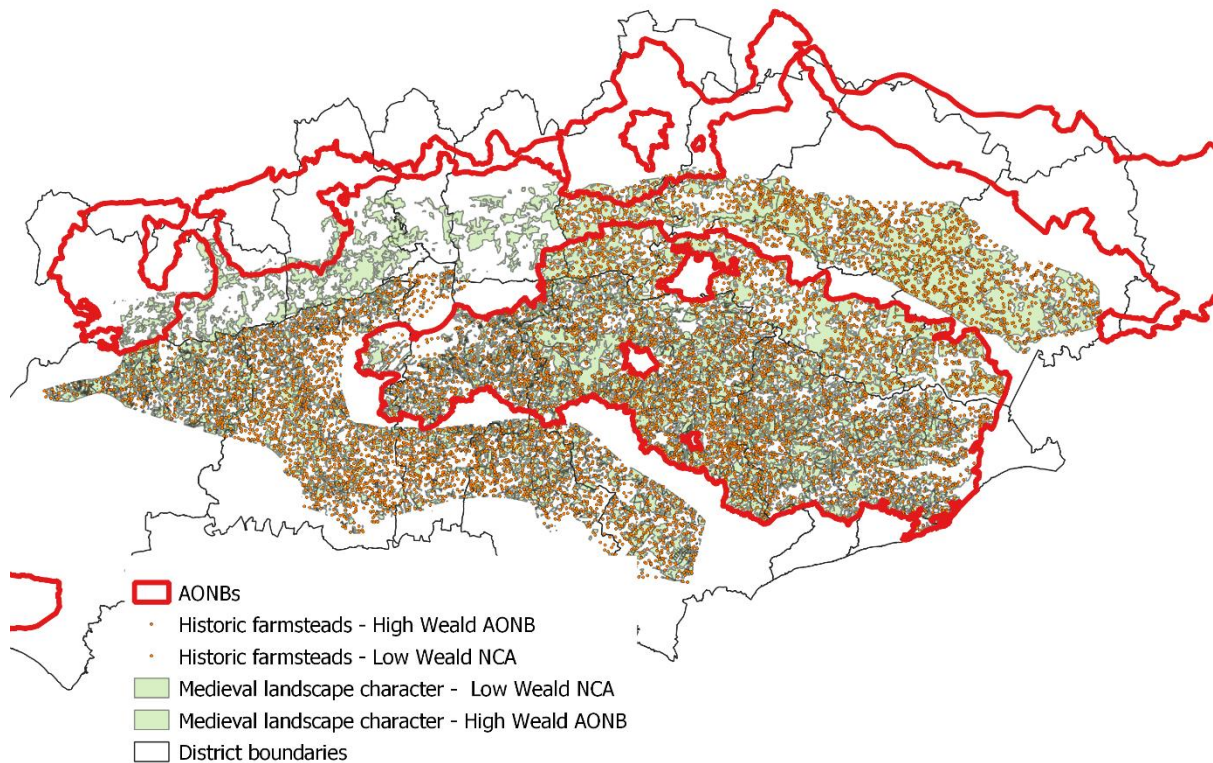
Instead of blindly applying a formula, the housing requirements for each LPA should be evidence based including assessments of landscape capacity – that is consideration of what is valued in a place and its sensitivity to change applied at a fine-grained scale – and scrutinised properly through a process such as that suggested in our answer to Question 7b.

8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?

No. The affordability issue in the South East is not due to restrictions in supply but because of its proximity to London and its higher paid jobs. The level of affordability should instead prompt an increase in the supply of affordable homes. In addition, the high housing numbers the formula produces for the South East are not sustainable or deliverable because this part of England is highly constrained by Green Belt, National Parks and AONB. Most urban areas are also constrained by tight administrative boundaries so are unable to expand within their own local planning authority area (see Brighton, Crawley and of course London).

Landscape capacity should be a key indicator of the quantity of development to be accommodated. The map below illustrates the density of historic landscape character – including surviving medieval field systems, ancient woodland and historic farmsteads - in the

High Weald AONB and adjacent Low Weald National Character Area. The High Weald AONB is protected for its nationally valued outstanding beauty but it is evident that surviving historic landscape features, which are associated with undisturbed soils and high biodiversity, are also present across the adjacent undesignated landscape of the Low Weald. These features are intimately connected both socially and ecologically across these adjoining landscapes and any robust method for calculating housing numbers should include landscape capacity and be sufficiently fine-grained to take account of these constraints.



9(a). Do you agree that there should be automatic permission for areas for substantial development (Growth areas) with faster routes for detailed consent?

No, because these faster methods will not be able to take proper account of all the relevant evidence. For instance, at Local Plan stage, it will only be possible to identify high level mapable constraints such as flood plains and land previously designated for its ecological value (SSSIs etc). It would not be feasible to carry out site by site ecological surveys of all potential growth areas given the tight timescale proposed for Local Plans. This means that much of the detailed information will not be available until the planning application stage. Some of this information may also change over time – a species poor field could have improved to species rich in the period between allocation as part of a growth area and detailed application. Any fast tracking of the application process would not be able to take account of such changes.

9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?

No the same points raised in response to question 9(a) are relevant to Renewal areas. Even if these are restricted to previously developed sites there will still be changes in needs and

constraints between Local Plan zoning and detailed application stage. The reduced opportunity for consultation and delegation to officers for these consents is also very concerning as most people will not know how proposals will affect them until the detailed stage.

For protected areas there is no clarity about what sort of development will be considered appropriate, and the assumption is that planning applications will have to be submitted as at present. Under the current system inappropriate major development is being permitted in the High Weald AONB and we remain concerned that this will not change under the new system. We would like to see AONB partnership powers, and those of our local authority partners strengthened to prevent large scale development in nationally important landscapes.

It appears that there may be protected areas within renewal or growth areas (such as flood plains, green space, nature recovery areas etc) where no development would be appropriate. But the protected zone would apparently cover National Parks and AONBs, many of which have whole towns and large villages within their boundaries. There is no indication how these would be treated. Clarification is sought from the Government that a limited amount of development, ideally focused on affordable housing, will still be possible within an AONB without the need to designate renewal or growth areas in this designated landscape.

9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?

No, this is just a way of taking these important local decisions out of the hands of democratically elected councillors. If housing numbers are to be binding then it should be left to LPAs to decide the best way to meet these.

10. Do you agree with our proposals to make decision-making faster and more certain, and make greater use of digital technology?

No. Development Management has a key role in ensuring that development is sustainable, contributes to the sense of place and meets the needs of the area. Particularly in complex applications the expert judgement of the planning officer and other specialists involved is crucial to placemaking and cannot be reproduced by digital means or significantly speeded up. Our view is that this section of the White Paper is overly weighted toward the interests of developers and landowners and does not recognise the importance of expert judgement or the need to make careful decisions about development that will have a lasting impact on the area.

We are concerned about machine readable applications. While some of the application maybe standardised, key information required as part of the application is by necessity place specific. No substantive applications should be passed without being judged by a planning officer who can apply current and local place-specific knowledge to the decision.

The amount and length of supporting reports in the English planning system has grown considerably in recent years and while it is not easy to demonstrate that this has increased the quality of outcomes, we do not agree that shorter planning applications, with a reduced

amount of key information, are always desirable. While a focus on clarity and conciseness is welcome, many development proposals, particularly in valued or sensitive landscapes, will require detailed assessments across a variety of issues, including ecology and landscape, which should not be contained by a maximum page number. This approach can be gamed by developers through inserting summary tables and images, rather than undertaking proper analysis thereby making scrutiny more difficult.

We are concerned that a standardised 50-page planning statement will be unable to provide all the necessary information to prove biodiversity net gain, all the viability evidence to support the level of affordable housing provision or a heritage statement on a proposal involving heritage assets. The standard of ecological information submitted for planning applications is generally poor and it would be challenging to provide all the necessary information as required by the Environment Bill to prove biodiversity net gain within such a short statement.

The proposal to refund the planning application fee if an application is not determined in time is not supported. We consider that this would lead to an increase in LPAs determining applications as they stand and not taking any revisions in order to meet the deadlines. In reality this is therefore likely to increase the number of refusals. Giving deemed consent if the deadline is missed is also not supported. It is difficult to see why local communities should effectively have to suffer unacceptable development that is allowed by default. Lastly, the proposal to refund the application fee if a development is refused and allowed on appeal is based on the false premise that all such LPA decisions are wrong or unreasonable. Many appeals are very complex and come down to professional judgement by the Inspector having weighed up all the issues. This doesn't mean the original decision was wrong, just that decision-makers have come to different judgements on the importance of the issues concerned. Where decisions by the LPA are unreasonable there is already a route for developers to apply for costs.

Finally the proposed increased use of Planning in Principle which requires no supporting evidence and delegating all detailed stage applications to officers is not supported as many issues will not be detectable at the early stage or may change over time, and these proposals reduce public scrutiny and democratic accountability.

11. Do you agree with our proposals for digitised, web-based Local Plans, supported by a new national template?

Whilst this is supported in principle there must still be opportunities for people to engage in Local Plans where they do not have digital skills or the technology. Consultation works best where a variety of methods are used to maximise the number and diversity of people engaging in a consultation. Restricting engagement or the content of Local Plans to digital forms would disproportionately affect older people and those in rural areas with poor or no internet.

A data led digitised planning system is only as good as the data fed in. The proposal for a national template will lead to an undermining of local character and distinctiveness if only national data sets are used. Any template should be able to accommodate locally originated data sets providing information on locally important characteristics and features.

12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans?

No. We agree that it currently takes too long to prepare a local plan. However, we think 30 months to be unrealistic and the individual stages need to be given more thought. As an overarching comment the proposed system does not allow people to engage meaningfully with the process. The new system does not provide sufficient time to resolve inherent conflicts in the plan making process. Plan making cannot be done simply through the application of an algorithm but requires the application of expert judgement. A rigid and rushed local plan process runs the risk of losing fine judgement and thus making poorly informed decisions on the development of land.

Given that the intention is for the 'in principle' decisions to be made at local plan stage, with limited opportunity for scrutiny or change at the detailed application stage, the limitations of the evidence available to LPAs at local plan must be acknowledged. In particular, the mapped ecological information that is available is insufficient to make binding decisions about the principle of developing sites. The ecological complexities of individual sites will be missed if site surveys are not required before determining areas of development. Even if surveys were carried out at this stage, due to time lag between zoning and implementation, the ecological data underpinning the zoning decision is likely to be inaccurate and out of date by the time the development is built (an example of this is at Lodge Hill in Kent where an allocated site had to be de-allocated because by the time the planning application was made its ecological interest was worthy of SSSI designation). This reversal in the light of new evidence would not be possible under the new planning system proposed.

The consultation promotes an open-data approach. While on the surface this could be viewed as a good, transparent approach, the experience of the Wildlife Trusts is that making all ecological data open is likely to result in a reduction in data availability (particularly for protected species), and the erosion of data quality (particularly in cases where local data is not comparable at the national level).

We would make the following detailed comments:

Stage 1

A call for sites takes much longer than six months to organise and then assess the sites that are submitted. Rushing at this stage can lead to future problems. It is also unclear on how the public would engage at this stage. Is it simply for people to say how they would like to engage in plan making rather than help to shape the plan itself with their aspirations for their local area? Proper engagement with local people would take minimum of a year and should be supported by trained facilitators and additional resources.

Stage 2

The target time of 12 months overlooks how complex and often conflicted evidence gathering can be, especially where there is no opportunity to supplement it at the detailed application stage.

Stage 3

Consultation on submission makes it too late to make meaningful responses. As the plan will have been submitted it will not be possible for the LPA to amend it in response to comments received. It is not clear who will manage the consultation. Will it be PINS or the LPA?

Stage 4

The intention for an examination to last 9 months is admirable, however, PINS will need to be adequately resourced for this to happen. Will there be consultation on any modifications to the plan?

Stage 5

The 6-week period proposed would be adequate.

13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?

The consultation is unclear on the future role of Neighbourhood Plans. We think that Neighbourhood Plans should be allowed to identify land for new purposes including community facilities, green spaces and affordable housing. If Neighbourhood Planning Groups were restricted to producing design codes it would not play to the strengths of the qualifying bodies, who have built up considerable expertise in planning for their neighbourhoods since Neighbourhood Plans were introduced by the Government in 2011.

Neighbourhood Planning groups are in the best position at a local level to balance the competing demands for development and protection that good place making entails. They are also in the best position to identify what features and facilities make their places special and unique and Neighbourhood Plans need the ability to protect and enhance these characteristics. This goes beyond the remit of a design code.

13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?

The assumption that design and digital tools are the only remit of Neighbourhood Plans is very worrying. The experience of the last 8 years has shown that Neighbourhood Planning groups are very good at engaging the public, building the capacity of communities to engage with the planning system and identifying what is special about the area and valued by its residents. Whilst the experience of Neighbourhood Plans allocating market housing has been mixed, they are very good at promoting affordable housing schemes and allocating land for other uses such as community buildings, local green spaces, community orchards and allotments etc. These successes should not be lost in the new system. Similarly, whilst design codes will mostly be beyond the skill sets of Neighbourhood Planning groups, they are experts in their own local areas and could produce the character assessments that would inform these codes.

The short timescale proposed for the new plans will have a major adverse impact on the ability of parishes to meaningfully engage in plan-making. Neighbourhood Planning should be supported with funded facilitators and access to design and other experts to allow them to harness local skills and ambitions to inform the plan-making stage.

14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?

Yes, we agree that there should be a stronger emphasis on the build out of developments. However, very little is set out in the White Paper to address this. We propose enacting the recommendations from the Letwin review into Build Out Rates and taking measures to tackle land banking by developers. Whilst LPAs can, and should, progress local plans and planning applications quickly they do not control any levers when it comes to building out developments and implementing planning permissions. One solution is to charge council tax or some sort of vacant land tax on all new homes that are granted detailed planning permission. The land value rises as soon as permission is granted so it seems reasonable that some betterment should accrue from that point.

15. What do you think about the design of new development that has happened recently in your area?

Many developments in the High Weald have been poorly designed, often with no consideration to the context or the local landscape character other than superficial details of materials etc. The same design of new housing estates can be seen wherever you are in the country.

We applaud the white paper focus on building beautiful places. The poor design and quality of new development is a failure of the planning system as a whole. However, the answer is not less planning, but more and better. Planning departments should be strengthened and respected, with multidisciplinary teams the norm, having access to urban designers, spatial analysts, community facilitators and experts in landscape and the environment.

We agree that the planning process should result in 'net gains for the quality of our built and natural environments' but in the absence of any systematic and measurable assessment of gain, we rely on the good judgement of planning departments and they should be supported and strengthened to fulfil this role.

16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?

Sustainability is a holistic concept and it should not be a case of identifying one priority over another. The climate and biodiversity crises are of equal immensity and concern, and it is extremely worrying that neither are mentioned in this consultation.

The White Paper has been written without reference to the biodiversity emergency and does not align with either existing or emerging environmental legislation. The Environment Bill is progressing through its final parliamentary stages and will make several significant environmental landmarks into law including biodiversity net gain, nature recovery networks and local nature recovery strategies. These need to be addressed in the new planning system along with measures in existing legislation such as the duty of local authorities and Government departments to have regard to the purposes of conserving biodiversity in the Natural Environment and Rural Communities Act (NERC). Clarification is required on the future of Habitat Regulation Assessment (HRA), which is not mentioned in the White Paper. The HRA ensures that adverse impacts do not occur on some of our most important and

cherished nature designations sites. The new simplified process needs to integrate HRA and in particular retain the precautionary principle and compensatory habitats.

The White Paper has also been written without reference to the climate change emergency. Although the importance of addressing climate change is stated at a high level within the document, no tangible measures are set out and the whole document seems to be about speeding up the delivery of housebuilding at the expense of anything else.

A target of 300,000 new homes pa will inevitably result in large greenfield developments, permanently sterilising huge areas of soil and compromising soil carbon storage. We would expect carbon budgets, including impact on soil carbon, to be produced for all proposed developments at the plan making stage.

17. Do you agree with our proposals for improving the production and use of design guides and codes?

No. We welcome the emphasis that the White Paper places on good design and the creation of beautiful places. We acknowledge that design guides can increase the quality of places delivered and have recently published a High Weald Housing Design Guide which helps developers to create housing developments that are landscape-led and distinctive to the High Weald. However, we do question whether prescriptive Design Codes allow truly innovative design to come forward that speaks to the landscape in which it is located. The type of 'pattern book' that developers have been using for their house types is part of the problem which has led to the generic housing estates referred to in answer to Qu 15.

The focus on design codes suggests that references to beauty in the document relate solely to visual amenity. We would expect to see any design code document relating to beauty to describe the breadth and depth of aesthetic experience that beautiful places encompass, including the opportunities for bird song and tranquillity, and beneficial kinaesthetic movement in nature.

Design codes will not of themselves deliver better quality or avoid ugly buildings as claimed by the report. Experience in the High Weald of applying local authority design guidelines and the High Weald Housing Design Guide illustrates how volume housebuilders are adept at applying a superficial 'pick and mix' approach to design. Typically, they offer minor surface changes in detailing to their stock building types without thought for more fundamental design issues such as site layout, the relationship between buildings and spaces, function and opportunities for using local materials. Scrutiny by independent designers will be essential to improve design standards. An understanding of local landscape and building character, and sensitive interpretation of design codes in this context will require expert input and enforcement at the point of application and implementation.

The white paper gives equal weight in the preparation of design codes to what is locally popular and what is characteristic. What is popular is an overly simplistic aim and open to undue influence. In our view the empirical evidence required to demonstrate popularity should be evidence from a socially just participative engagement process, rather than a simple poll.

18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?

A national design body will be necessary to compensate for the skills gap as there are currently very few people with an expertise in writing design codes. Requiring a chief officer in each LPA for design and place-making will only be effective if you also require that they have the appropriate qualifications (i.e. as a chartered Town Planner, Architect or Urban Designer). Otherwise existing post-holders will just have their job titles changed. It should also be a requirement that these chief officers sit on the management team of their local authorities so they have a real influence over corporate decisions.

20. Do you agree with our proposals for implementing a fast-track for beauty?

No, beauty should be the norm not the exception and the White Paper proposals are already speeding up the decision-making process to the point that endangers robust decision-making. Good design is a product of careful work by multi-discipline experts informed by genuine community engagement. It is not a fast process.

24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?

Yes, we need to significantly increase the amount of affordable housing delivered in this country generally but particularly in protected landscapes where local people, especially those in the land-based sector, have been priced out of the market.

Measures to support rural exception sites and community housing initiatives should be strengthened in these areas and additional support provided.

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?

No. The only restriction on CIL spending is that it must be on infrastructure, and this should also be true for the Infrastructure Levy. Services should be paid for through the precept. The 25% neighbourhood share should be passported straight through to Parish Councils in parished areas regardless of whether they have a neighbourhood plan in place, and in unparished areas there should be procedures in place for local people to decide how their neighbourhood share is to be spent. Many neighbourhood planning groups have been denied access to this funding because their local authorities have not adopted CIL charging schedules and we need to re-establish the link between development and community benefits on the 'who takes the pain gets the gain' principle.

25(a). If yes, should an affordable housing 'ring-fence' be developed?

Yes, because there will be pressure on local authorities to deliver things like roads and schools for the existing population and the voice of those who need affordable housing is often lost. This already happens when viability issues force communities to choose between the delivery of affordable housing and the delivery of infrastructure, usually to the detriment of the former.

26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

Yes, older people may be left behind by the digital proposals. Also, whilst not a protected characteristic under the Equalities Act, the impact on rural communities with poor or no broadband should also be considered.

The short timescale for consultation will also adversely affect the ability of these groups to source information and seek assistance to help them respond.



Planning White Paper response from NAAONB

Emailed to planningforthefuture@communities.gov.uk 29.10.2020

The National Association for Areas of Outstanding Natural Beauty (NAAONB) is a charity that promotes the conservation and enhancement of natural beauty, and advances the education, understanding and appreciation of the public in relation to this, in and around Areas of Outstanding Natural Beauty (AONBs), other Protected Areas, and those landscapes for which designation might be pursued.

A number of AONB partnerships have responded individually to this consultation and the comments of the NAAONB should be seen as supportive and supplementary to these.

The NAAONB welcomes the opportunity to comment on the proposals in the Planning White Paper – Planning for the Future (PWP). It accepts that many of these proposals are ‘high level’ and it looks forward to working constructively with Ministers and officials of MHCLG and Defra on the detailed guidance and legislation necessary to implement them.

This paper is intended to provide a high-level response setting out the impact of the proposals on the planning system’s ability to protect and enhance Areas of Outstanding Natural Beauty (AONBs) in line with the requirements of the Countryside and Rights of Way (CROW) Act 2000. It has been informed by discussions within the community of planners working in the different AONB bodies in England. The absence of commentary on particular proposals should not be taken as implying support for those proposals.

As an over-arching comment, there is a worrying implication in the PWP that the existing planning system adequately protects AONBs. This does not align with the experience of many AONB partnerships, particularly those in the south east that have seen a dilution of protection in the last decade due to development pressure, especially for housing, being given priority over the conservation and enhancement of AONBs. The proposed planning reforms are an opportunity to redress this situation and value these landscapes as an asset for the nation, rather than being seen as a constraint that must be overcome.

The response is informed by considerations in three key areas that have been identified as of particular importance to the protection and enhancement of AONBs through the planning system. These are:

1. How the proposals align with the intended outcomes other relevant recent initiatives;
2. How the development needs of AONBs will be assessed and planned for; and

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3. How the complexities that planning needs to address are catered for in a significantly “simplified” system.

1. How the proposals align with the intended outcomes other relevant recent initiatives

The key documents that need to be taken account of in reforming the planning system are the Landscapes (“Glover”) Review, the Environment Bill – biodiversity net gain, nature recovery networks – the Agriculture Bill – Environmental Land Management - and the Letwin review of housing delivery. Any alignment is not obvious in the PWP and this is an important issue for future detailed work.

2. How the development needs of AONBs will be assessed and planned for

The proposal for binding housing requirements needs to take account of the landscape character and capacity of protected areas like AONBs for development, based on research that is best undertaken at the local level. Similarly the other development, community and infrastructure needs for protected areas should be based on local evidence based assessments rather than the application of formulas to achieve sustainable development that conserves and enhances protected areas rather than harming them.

3. How the complexities that planning needs to address are catered for in a significantly “simplified” system.

Whilst the ambition to simplify the existing system is supported, this could be done by removing the many layers of complexity that have been added over the last decade, particularly with the many different routes to gaining permissions. The proposals for simplifying local plans raise the following issues:

- The restriction to three zones in Local Plans is too simplistic. The creation of high quality places needs a more nuanced approach that recognises that new communities need green areas for leisure and health and space for nature and that protected landscapes need to accommodate some growth.
- There also needs to be better integration of the system of land-use planning (now generally described as planning for housing) with other types of planning, in particular with planning for transport infrastructure and services, and minerals and waste – often key issues in AONBs. The current proposals seem to consider housing in isolation, detached from other considerations.
- There is a missed opportunity to look at basing local plan boundaries on landscape-scale geographies, including enabling single local plans for AONBs as recommended by the Glover Review.
- While there may be a case for including some current local plan development management policies in the NPPF (and even turning some of them into building regulations) it is difficult to see how the NPPF could include sufficient detail, including the necessary spatial distinctions, to effectively represent development management policies necessary for the protection and enhancement of specific AONBs (let alone the different character areas within them). The ability of local and neighbourhood plans to include policies which address issues that are specific to

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their area should be retained, whilst avoiding the duplication of development management policies.

Planning Update for High Weald Network 2020

Major	Minor	Other (not LPA)
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Outstanding Applications from Previous Years (as at end August 2020)

Local Authority / Organisation	Reference	Description	Site	Response Type	Response Date	LPA Decision	Decision Date
Wealden	WD/2017/2197/MAO	119 dwellings	Eridge Road, Crowborough	Object	26/10/2017 05/03/2018 20/09/2018	Approved	Committee 06/02/2020 05/03/2020 10/07/2020 Decision issued 21/09/2020
Tunbridge Wells	18/01063	50 dwellings	Highgate Hill, Hawkhurst	Advice	04.05.2018	Refused, appeal in abeyance due to Covid-19	
Wealden	WD/2018/2709	Replacement dwelling	Forest View, Cansiron Lane, Holtye	Object Advice	13/02/2019 12/08/2020	Approved	23/09/2020
Rother	RR/2018/3064	10 dwellings	Churchill Farm, Seddlescombe	Advice	10/06/2019		
Wealden	WD/2018/2298	Replacement dwelling	Tylebrook Farm, Forest Row	Advice	17/06/2019	Resolution to approve sub to s106	02/09/2020

Rother	RR/2019/1332	8 dwellings	Gate Cottage, The Street, Seddlescombe	Advice	02/07/2019		
Tunbridge Wells	19/01253	31 dwellings	Westfield, Highgate Hill, Hawkhurst	Advice	16/07/2020	Withdrawn	23/09/2020
Tunbridge Wells	19/01493/OUT	31 dwellings	Sharps Hill Farm, Sandhurst	Object	05/08/2019		
Rother	RR/2019/1659	New buildings and lake etc for PGL use	Pestalozzi, Seddlescombe	Object	29/08/2019		
Tunbridge Wells	19/02267/OUT	74,000 sqm B1/B8 floorspace	LA Kingstanding Way, Tunbridge Wells	Object	16/09/2019	Committee resolution to approve sub to s106	23/09/2020
Rother	RR/2019/2194	20 dwellings	Foundary Close, Hurst Green	Advice	18/11/2019		
Wealden	WD/2019/0882/	Variation of s106 to allow weddings	Sweetwoods Park Golf Course, Cowden	Advice	10/06/2019	Approved	06/10/2020
Wealden	WD/2019/2321/MRM	14 dwellings	The Cart Barn, Heathfield	Object	17/12/2020		
Ashford	19/01669/AS	53 apartments (in the setting)	Smallhythe Road, Tenterden,	Advice	18/12/2020	Appeal pending against ND	
Tandridge	2019/2142	Householder development	Lullenden Manor, Hollow Lane, East Grinstead	Standard Minor	16/01/2020		
Ashford	19/01788/AS	250 homes (in the setting)	Appledore Road, Tenterden	Advice	19/01/2020	Refused	23/09/2020
West Sussex	WSCC/004/20	Re-profiling of landfill site	Evergreen Farm, West Hoathly Road, East Grinstead	Advice	11/02/2020		
Mid Sussex	DM/20/0799	22 dwellings	Dirty Lane, Ashurst Wood	Object	10/03/2020		
Mid Sussex	AP/20/0008	9 dwellings	Peacocks, Church Lane, Horsted Keynes	Object to PINs	12/03/2020		

Rother	RR/2020/120	5 dwellings	Cadborough Barn, Udimore Road, Rye	Object	17/03/2020		
Wealden	WD/2020/0170	94 dwellings	Ghyll Road, Heathfield	Object	18/03/2020		
Wealden	WD/2020/0337	B1 office buildings	Flower Pot Nursery, Frant	Object	24/03/2020		
Hastings	HS/FA/20/00175	Shepherds hut etc	Little Warren Cottage, Hastings Country Park	Standard Minor	23/03/2020		
Hastings	HS/FA/20/00132	New dwelling (in the setting)	L/A Lidham Farm, Rye Road, Hastings	Standard Minor	24/03/2020		

Planning Applications and Appeals Received since 1st April 2020

Local Authority / Organisation	Reference	Description	Site	Deadline	Response Type	Response Date	LPA Decision
April							
Tunbridge Wells	20/00583/FULL	Conversion of barn to dwellings	Potters Farm, Potters Lane, Hawkhurst	06/05/2020	Object	06/04/2020	Refused
Horsham	DC/20/0470	473 dwellings	Newhouse Farm, Horsham	31/03/2020	Major Development Test Advice	14/04/2020	Refused
Tandridge	2020/194	Field shelter	Orchard Cottage, Moons Lane, Dormansland	30/04/2020	Standard Minor	15/04/2020	Approved
Mid Sussex	DM/20/1183	Sixth Form Building	Worth Abbey, Turners Hill	15/05/2020	Object	16/04/2020	Approved
Tunbridge Wells	20/00815/FULL	168 dwellings	Land adjacent to Turnden, Cranbrook	11/05/2020	Consultation during lockdown	16/04/2020	
Mid Sussex	DM/20/0979	Conversion and new dwellings	Buxshalls, Ardingly Road, Lindfield	Amended plans 10/08/2020	Query re trees Final Response	16/04/2020 22/06/2020	
Wealden	WD/2020/0608	Repositioning of new office building	Dower House Farm, Blackboys	N/A	Query re Ancient Woodland	20/04/2020	Withdrawn
Rother	RR/2020/285	Extension	The Cottage, Old Forewood Lane, Crowhurst	N/A	Query re Ancient Woodland	28/04/2020	
Tunbridge Wells	Appeal 19/02170/OUT	27 dwellings	LA Hartley Gate Farmhouse, Cranbrook	26/05/2020	Appeal statements	26/05/2020	

Local Authority / Organisation	Reference	Description	Site	Deadline	Response Type	Response Date	LPA Decision
Wealden	Appeal	Against replanting of hedgerow order	Little Windmill Farm, Windmill Lane, Cousley Wood, Wadhurst	03/06/2020	Response supporting replanting	03/06/2020	
Wealden	WD/2020/0734	150 homes (setting)	Orchid Riding School, Walshes Road, Crowborough	19/05/2020	Advice	19/05/2020	
Crawley	CR/2020/0192	85 dwellings (setting)	Breezehurst Playing Fields, Bewbush, Crawley	18/05/2020	Advice	19/05/2020	
Horsham	DC/20/0756	Replacement barn	Mannings Heath Golf Club Amended Plans	14/05/2020 13/07/2020	Query Advice	12/05/2020 08/07/2020	Approved
Mid Sussex	DM/20/1356	Tourism Facilities	Forest Lodge, Parish Lane, Pease Pottage	14/05/2020	Standard Minor	12/05/2020	Approved
May							
Wealden	WD/2020/0717	Campsite with 100 pitches	Bowl Water	22/05/20	Advice	21/05/2020	
Wealden	WD/2020/0724	Reserved matters for 6 dwellings	Cadence, Punnetts Town	25/05/2020	Object	12/05/2020	
Mid Sussex	DM/20/1430	Retention of track and remodelling of course	Cuckfield Golfcourse	25/05/2020	Object	18/05/2020	
Tunbridge Wells	20/01089/OUT	4 dwellings (access through ancient woodland)	LA Broughton House, Rolvenden Road, Benenden	29/05/2020	Advice	18/05/2020	
Tunbridge Wells	20/00814/REM	Reserved matters for 180 dwellings	Brick Kiln Farm, Cranbrook	29/05/2020	Object Planting advice	05/06/2020 27/07/2020	
East Sussex	Appeal RR/828/CM	Deposit of waste on woodland	Appletree Cottage, Beacon Lane, Cripps Corner, Staplecross	12/06/2020	Relied on original objection	-	Dismissed

Local Authority / Organisation	Reference	Description	Site	Deadline	Response Type	Response Date	LPA Decision
Horsham	DC/20/0818	Replacement dwelling	Old Springfield Farm Springfield Lane Colgate	01/06/2020	Advice	01/06/2020	
Horsham	DC/20/0792	Mobile home	Old Springfield Farm Springfield Lane Colgate	01/06/2020	Standard Minor	01/06/2020	
Mid Sussex	DM/20/1352	Cessation of the use of the site as a sawmill. Erection of four detached dwellings	Highbrook Sawmill And Fencing Company Hammingden Lane Ardingly	04/06/2020	Object	03/06/2020	Refused
Wealden	WD/2020/0138	7 dwellings	South Lodge, Castle Hill, Rotherfield	09/07/2020	SV Object	24/06/2020 06/07/2020	Refused
Wealden	WD/2020/0660	2 dwellings	Mill Lane, Cross In Hand	-	Object	21/05/2020	Withdrawn
Hastings	HS/FA/20/00222	29 dwellings	Land west of Rock Lane, Hastings	11/06/2020	Advice	22/06/2020	
Ashford	20/00541/AS	1 dwelling	Land south of 63 The Street, Wittersham	-	Advice	08/06/2020	Refused
Agent for Rampion	Pre-application	Offshore windfarm and onshore infrastructure	Bolney Sub-station	-	Advice	09/06/2020	N/A
Wealden	WD/2019/2121	Floodlighting – amended details	Groombridge Tennis Club	-	Advice	29/11/2019 09/06/2020	
Rother	RR/2020/500	RM for 3 dwellings	Chain Lane, Battle	-	Advice	16/06/2020	
Horsham	PE/19/0243	New facilities	Mannings Heath Golf Club	-	Advice	18/06/2020	N/A
Mid Sussex	DM/20/1569	Floodlighting of pitch (renewal of previous permission)	Ardingly College, Ardingly	11/06/2020	Advice	08/06/2020	Approved
Rother	Appeal WR RR/2019/2126	5 dwellings	Hugh's Field, Calbec Hill, Battle	17/06/2020	Relied on original objection	-	

Local Authority / Organisation	Reference	Description	Site	Deadline	Response Type	Response Date	LPA Decision
Tunbridge Wells	Appeal against non-determination 18/03976/OUT	Outline (Access Not Reserved) - Erection of 62 dwellings	Land At Ockley Road And Heartenoak Road Ockley Lane Hawkhurst	08/02/2018 10/06/2020	Maintained objection and supported LPA report	09/06/2020	
June							
Wealden District Council	WD/2020/0200/MAJ	Conversion of 4 farm buildings to residential and addition of 2 dwellings	Skidders Farm, Wadhurst	-	Initial thoughts Specialist report Site Visit	10/06/2020 22/07/2020 10/08/2020	
Wealden District Council	WD/2020/0854/MAO	18 dwellings	Beacon Road, Crowborough	26/06/2020 10/09/2020 amends	Object No further response needed	23/06/2020	
Rother District Council	RR/2020/585/	10 dwellings	Singehurst - Land at, Pashley Road, Ticehurst	03/07/2020	Advice	06/07/2020	
Wealden District Council	WD/2020/0844/O	4 dwellings	Cadence, Punnetts Town	01/07/2020	Advice	01/07/2020	
Wealden District Council	WD/2016/3084/MAO	24 dwellings	Cadence, Punnetts Town	01/07/2020	Advice	02/07/2020	
Horsham District Council	WR Appeal against refusal of DC/19/1847	8 dwellings	Land Adjacent To The Crabtree Inn Brighton Road Lower Beeding	17/07/2020	Relied on original objection following discussion with HDC	-	

Local Authority / Organisation	Reference	Description	Site	Deadline	Response Type	Response Date	LPA Decision
Horsham District Council	WR Appeal against refusal of DC/19/1846	12 affordable dwellings	Prongers Orchard Land To The South of Village Hall Leechpond Road Lower Beeding	17/07/2020	As above	-	
East Sussex County Council	RR/3420/CC	New school buildings	Claverham Community College	20/07/2020	Advice	06/07/2020	
Hastings	HS/FA/20/00356	Erection of private workshop/storage building together with new vehicular access and hard-surfacing (part retrospective) Setting	Land to East of, 40 Tilekin Lane, (Links Cottage)Hastings	10/07/2020	Advice	09/07/2020	Withdrawn
Rother	RR/2019/2818/P	Approval of reserved matters relating to appearance and landscaping pursuant to outline permission RR/2019/2198/P for the erection of 30 dwellings.	Hillbury Field, High Street, Ticehurst	10/07/2020	Advice	13/07/2020	
Rother	RR/2020/896/P	Demolition of former piggeries and conversion of two disused agricultural buildings to provide commercial storage (Class B8) and an office suite (Class B1a) with associated	Former Piggeries, Crockers Lane, Northiam	20/07/2020	Advice	13/07/2020	

Local Authority / Organisation	Reference	Description	Site	Deadline	Response Type	Response Date	LPA Decision
		access, parking and landscaping					
Mid Sussex	DM/20/1647	Change of use from agricultural to a sports field with the erection of a yurt.	East Grinstead Sports Club Saint Hill Road East Grinstead	16/07/2020	Query	13/07/2020	
Wealden	WD/2020/0890/MAJ	Conversion of barns to 8 dwellings and new build 3 dwellings	Warren Farm, Eridge	20/07/2020	Object with specialist report	22/07/2020	Withdrawn
Rother	RR/2020/854	Stables	Land adjoining Oak Farm Oast, Beech House Lane, Saleshurst	13/07/2020	Object	13/07/2020	Refused
Wealden	Pre-app from agent	Residential	Windmill Lane, Wadhurst	-	Advice	20/07/2020	N/A
Rother	RR/2020/599	Two mobile homes and two tourers	Firtree Cottage, Netherfield Hill	-	Object	27/07/2020	Refused
Mid Sussex	DM/20/2332	Industrial units	Cedars, Pease Pottage	27/07/2020	Advice	27/07/2020	
Hastings	HS/CD/20/00452	Discharge condition (materials)	Burgess Road, Hastings	30/07/20	Advice	30/07/2020	Approved
Tunbridge Wells	Pre-app from agent	Residential	Horns Road, Hawkhurst	-	Advice	04/08/2020	N/A
Horsham	DC/19/2583	Winery (amended description and plans)	Mill Farm, Mannings Heath	03/08/2020	Object	04/08/2020	
Tunbridge Wells	19/02025	374 homes (reduced from 417)	Hawkhurst Golf Course	10/08/2020	Object	04/08/2020	
July							
NSIP	Pre-app – scoping report	Rampion 2 -off-shore wind turbines and onshore infrastructure	Turbines off coast at Climping, substation at Bolney	04/08/2020	Advice	04/08/2020	N/A

Local Authority / Organisation	Reference	Description	Site	Deadline	Response Type	Response Date	LPA Decision
Mid Sussex	DM/20/2305	Gym	The Garden House, Broadhurst Manor, Horsted Keynes	10/08/2020	Advice	11/08/2020	
Hastings	HF/FA/20/00468	Cafe	Ore Place Farm, The Ridge, Hastings	13/08/2020	Standard minor	11/08/2020	
Mid Sussex	DM/20/1289	Campsite	Land at Sparks Farm, Staplefield	17/08/2020	Advice	17/08/2020	
Rother	RR/2019/2738	34 dwellings	The Paddocks, Northiam (amended plans)	14/08/2020 and 30/10/2020	No further response needed	-	
West Sussex	WSCC/042/20	Bund for replacement dwelling	Dan Tree Farm, Bolney	14/08/2020	Standard Minor	17/08/2020	
Mid Sussex	Appeal AP/20/0028	Barns and lagoons	Tremains Farm, Horsted Keynes	25/08/2020	No further response needed	-	
Sevenoaks	Appeal SE/19/02164	Upgrading farm track	Oakenden Farm, Chiddingstone	26/08/2020	No further response needed	-	
August							
Wealden	WD/2017/0143/MAJ	159 dwellings (setting) amended details	Benhall Mill Road, Tunbridge Wells	18/08/2020	No further response needed	-	
Hastings	HS/FA/20/00470	Variation of condition 2 (approved plans) of Appeal Decision	Rocklands Private Caravan Park, Rocklands Lane, Hastings	17/08/2020	Standard Minor	17/08/2020	
Wealden	WD/2018/2709/F	Replacement dwelling	Forest View, Cansiron Lane, Holtye	14/08/2020	Advice	12/08/2020	
Hastings	HS/FA/20/00501	Erection of a chalet style detached dwelling	Land rear of 23, Martineau Lane, Hastings	24/08/2020	Standard Minor	17/08/2020	

Local Authority / Organisation	Reference	Description	Site	Deadline	Response Type	Response Date	LPA Decision
		(revision to HS/FA/17/00468)					
Wealden	WD/2020/1300/F	Demolition of Garden Centre, erection of 5 dwellings	Royal Mires Garden Centre, Lye Green, Crowborough	20/08/2020	Advice	20/08/2020	
Wealden	WD/2020/0013/MAJ	46 bedrooms, overnight accommodation	High Rocks, High Rocks Lane, Broadwater Warren	25/08/2020	Object	24/08/2020	
Rother	RR/2020/1231/P	Proposed agricultural barn.	Honeyland, Honey Lane, Ashburnham	25/08/2020	Object	24/08/2020	
Environment Agency	EPR/SB3295DY/A001	Environmental permit for private sewage treatment facility	Tudor Lodge, Handcross	09/09/2020	Advice	17/08/2020	
Rother	RR/2020/151/P	Up to 48 residential units (amended plans)	Land South of Pett Level Road, Fairlight Cove, Fairlight	09/09/2020	No further response needed	-	
Tunbridge Wells	20/02088/OUT	Outline planning permission with all matters reserved: Construction of 14 residential units	Land At Penshurst Road Bidborough	11/09/2020	Object	03/09/2020	
West Sussex	WSCC/045/20	Remove drilling fluids and carry out an extended well test	Lower Stumble Exploration Site, off London Road, Balcombe	17/09/2020	Advice	15/09/2020	
September							
Ashford	20/00004/EIA/AS	Screening opinion for the development of 28 dwellings	Land to the rear of 25 to 36, Lloyds Green, Wittersham	21/09/2020	Advice	17/09/2020	
East Sussex CC	RR/846/CM	Vehicle Servicing Depot and shed	Mountfield, Robertsbridge	01/10/2020		22/09/2020	

Local Authority / Organisation	Reference	Description	Site	Deadline	Response Type	Response Date	LPA Decision
Hastings	HS/FA/20/00627	Change of use of garage and store from Hotel (C1) to a mixed use of cafe and retail	The Old Rectory, 2-4 Harold Road, Hastings	15/10/2020	Standard Minor	12/10/2020	
October							
Kent	KCC/TW/0218/2020	Provision of outside shelters to enable all year round teaching	Langton Green Primary School, Lampington Row, Langton Green	11/11/2020	Standard Minor	22/10/2020	
Horsham	DC/20/1735	Erection of a detached three bay garage with loft room	Elenge Plat Grouse Road Colgate	08/11/2020	Standard Minor	22/10/2020	
Mid Sussex	DM/20/0143	Retrospective remedial and proposed works to stabilise and increase the level of the weirs and banks. Amended plans and supporting information received 16.10.2020.	Broadhurst ponds, Horsted Keynes	11/11/2020			

Other Consultations

Consultee	Document	Deadline	Response
Rother District Council	Draft Environmental Strategy	18/05/2020	13/05/2020
Wealden District Council	Statement of Community Involvement	15/06/2020	15/06/2020
BSI	Draft British Standard for Biodiversity Net Gain	24/06/2020	23/06/2020
Mid Sussex District Council	Sites DPD SA 32: Withypitts Farm, Turners Hill – design consultation	30/06/2020	22/06/2020
Wealden District Council	Scoping Report for Sustainability Appraisal	12/08/2020	11/08/2020
Tunbridge Wells Borough Council	Local Plan Draft Settlement Chapters	11/08/2020	11/08/2020
Mid Sussex District Council	Site Allocations DPD Regulation 19	28/09/2020	21/09/2020
MHCLG	Changes to the current planning system	01/10/2020	01/10/2020
MHCLG	Planning for the Future White Paper	29/10/2020	
Rother District Council	Targeted Early Engagement on the Local Plan	16/10/2020	12/10/2020
Rother District Council	Burwash Neighbourhood Plan Reg 16	06/11/2020	22/09/2020
Hurst Green Parish Council (AECOM)	Hurst Green NDP SEA Scoping Report	29/10/2020	13/10/2020
Tandridge District Council	Draft Open Space Strategy	09/11/2020	
Worth Parish Council	Copthorne Neighbourhood Plan Reg 14	13/11/2020	20/10/2020
Horsted Keynes Parish Council	Horsted Keynes Neighbourhood Plan Reg 14	07/12/2020	19/10/2020

Agenda Item: 12

Committee: High Weald AONB Joint Advisory Committee

Date: 25th November 2020

Title of Report: Risk Management – COVID-19

By: AONB Director

RECOMMENDATIONS

Members are recommended to:

1. Note the report;
2. Request that the Management Board continue to review significant risks as required and develop options for their management and;
3. Request the AONB Unit staff routinely review work practices, arrangements, and work programmes to mitigate the risks as far as possible.

1.0 Background

1.1 Members will recognize that although the High Weald AONB Partnership has faced challenging times particularly following the 2009 banking crisis and the series of subsequent funding cuts. The unforeseen arrival of the COVID-19 pandemic earlier in the year is not like anything we have faced before and, nine months on, it is very clear this crisis has had and will continue to have serious consequences for many organisations and individuals.

2.0 Key risks 2020/21 and beyond

2.1 For the time being the most significant and on-going risk is to people's health and the priority remains ensuring the staff and those we work with are kept safe and the opportunities for passing on the virus are kept to an absolute minimum.

2.1 As elsewhere, our business planning and working arrangements have been disrupted since March and it's clear that this is going to continue well into next year and possibly longer. Inevitably this has had an impact on our work programme, which is further compounded by the small size of the AONB team (six FTE). However, the virus and its effects are now better understood and given that the AONB Unit staff readily adapted to different working arrangements while maintaining an effective service, we are confident we can continue in a similar vein for the time being.

2.2 The impact of COVID-19 on the government's priorities drawn up since last December's general election will be considerable. The scale of the many demands placed on the Treasury and other government departments have been immense and will continue for the foreseeable future as the government attempts to deal with a legacy of underwriting loans, business rates relief, and health care priorities. This will have consequences not only to the funding and support provided by government for the work of protected landscape partnerships but also to future government policies and priorities for the sector.

2.4 The key risks to the Joint Advisory Committee are set out in appendix A.

3.0 Risk mitigation

3.1 Mitigation of the immediate risks

3.2 We have been monitoring the situation closely and we have put in place a range of measures to ensure the AONB Unit staff and those we work with are as safe as possible. We have also put measures in place to keep our key functions running, to stay in touch with one another, to manage the team, and to allow partners, residents, and others to continue to work with us. The office at Flimwell was re-opened in the summer for limited use and most meetings and all planned events were moved on-line. School and site/farm visits have resumed where possible but the AONB Unit staff continue to work primarily from home.

3.3 We have adapted to the new situation and we continue to support those groups and individuals with whom we work particularly closely (e.g. the Rother and Dudwell Farm Cluster and Sussex Lund applicants), with our partners and the public by using video and teleconferencing. We have used our regional and national contacts to exchange information and to identify how and where further support, guidance or action by the AONB Unit staff is needed.

3.4 We will continue to follow the government's guidance and that provided by our host authority East Sussex County Council and we have routinely reviewed our own practices, arrangements, and work programme. The AONB Unit staff follow a range of protocols while working from home and each work to a programme reflecting the current constraints/opportunities.

4.0 Mitigation of the longer-term risks

4.1 The current situation remains fast-changing and it is difficult to identify the likely longer-term risks the High Weald AONB partnership will face but the potential of further cuts to our funding cannot be ignored. Our experience following the banking crisis and subsequent government policies tells us the JAC will need to continue to demonstrate boldly the value and worth of the work we do. And, more importantly, the JAC will need to ensure the fundamental role all landscapes (if managed responsibly) play for the welfare of society are understood in the face of competing demands and those politicians and decision-makers lacking ecological literacy.

4.2 This means the JAC, in conjunction with the other protected landscape partnerships, will need to make an energetic and unapologetic case for society's need for beautiful, resilient, and complex landscapes providing us with a secure source of nutrient-dense food, carbon storage, clean and plentiful water, jobs, places to enjoy, and abundant above and below ground bio-diversity.

4.0 Conclusion

4.1 COVID-19 presents a range of unprecedented immediate and longer-term risks for the JAC and the country and these are difficult to predict. Risk management systems are in place and the AONB Unit will continue to follow official guidance, reviewing significant risks as required and developing options for their management whilst looking ahead to ensure we are in a strong and resilient position the moment this crisis ends.

Contact: Jason Lavender AONB Co-Director j.lavender@highweald.org

Appendix A High Weald JAC - COVID-19 Key Risks 25.03.20.

Sponsor: Sally Marsh/Jason Lavender

Author: Jason Lavender

Date: April 2020 - March 2021

Risk Log

Likelihood Ranking	1 = Improbable (<10%); 2 = Unlikely (10-30%); 3 = Less than Likely (30-50%); 4 = More than Likely (50-80%); 5 = Probable (>80%)
Consequence Ranking	1 = Minor; 2 = Moderate; 3 = Significant; 4 = Substantial; 5 = Grave

Likelihood	5					
	4					
	3					
	2					
	1					
		1	2	3	4	5
		Consequence				

Control Rating	
1. Excessive	Controls exceed the level required to manage the risk
2. Optimal	Controls are comprehensive & commensurate with the risk. All controls are working as intended.
3. Adequate	Some shortfall in level of controls but these do not materially affect the level of residual risk.
4. Inadequate	Weaknesses & inefficiency in controls do not treat the risk as intended.

Unit ref	Risk no	Risk What can go wrong	Root Causes How it can go wrong	Owner	Inherent Risk			Controls / Mitigating Actions Preventative & reactive control measures	Control Owner	Residual Risk			
					Likelihood	Consequence	Matrix Zone			Control Rating	Likelihood	Consequence	Matrix Zone
		Format: EVENT leading to CONSEQUENCE resulting in EFFECT ON PROJECT OBJECTIVES											
	1	Infection by COVID-19 and subsequent illness.	AONB staff and those we work with falling ill as a result of COVID-19.	AONB Director	4	4	Red	Follow government and ESCC guidance and also set up and maintain a variety of measures to ensure the AONB Unit staff and those we work with are as safe as possible. For more detail see paragraph 3.2 of the COVID-19 Risk Management report.	AONB Director	2	4	3	Red

2	Failure to meet current and revised work commitments and work programmes, unable to support individuals and organisations with their projects, difficulty securing funds to match external grants or to fund projects. AONB Unit staff unable to manage work commitments and caring duties. Recruitment of new staff suspended for the foreseeable future.	Reduced activity/service owing to changed working arrangements (internally and externally), inability to recruit new staff, additional caring duties for children and/or elderly relatives, and staff illness or absence (e.g. to assist with emergency planning).	AONB Director	4	3	Red	Work primarily from home, maintain contact with colleagues, partners, and others, adapt work programmes to meet existing commitments and priorities where possible, and review work programmes regularly to reflect changing circumstances. For more detail see paragraph 3.4 of the COVID-19 Risk Management report.	AONB Director	2	4	2	Amber
3	Those receiving grants from the JAC are unable to start or progress and complete their projects within the agreed timescales.	Restrictions placed on people's movements and activities, labour and material shortages.	AONB Director	4	2	Amber	Consult with the grant recipients and third party funders, review and change timescales, offer technical advice and moral support.	AONB Director	2	3	2	Amber
4	Remote IT working systems fail and/or needs not met, staff unable to work efficiently, fewer outputs, current and revised work programmes compromised.	Poor links to computer network/server results in slow machine operation, inability to download GIS data, update website etc.	AONB Director	3	3	Amber	Technical advice sought and recommendations/solutions implemented.	AONB Director	2	3	2	Amber
5	Reduction or loss of national and local government political and financial support to AONB partnerships owing to the range and scale of demands placed on government during and following the COVID-19 crisis and subsequent change in policies and priorities.	Adverse affect to the AONB core work remit and much reduced capacity and time to raise other funds to support core work and raise funds for project work.	AONB Director	4	5	Red	Continued and concerted engagement with national and local government and government agencies and ongoing liaison with the NAAONB. Active engagement with DEFRA S of S & Ministers directly and in conjunction with NAAONB and SEEPL. Active engagement of High Weald AONB Patrons and supportive High Weald MPs.	AONB Director	3	4	4	Red

Agenda item: 13:

Committee: High Weald AONB Joint Advisory Committee

Date: 25th November 2020

Title of Report: Update on the work of the National Association for AONBs

By: AONB Director

RECOMMENDATIONS

Members are recommended to:

1. Note the report
-

1.0 Background

1.1 England, Wales and Northern Ireland has 46 Areas of Outstanding Natural Beauty, covering 18% of the countryside, over a fifth of the English coast, and including 12,000 miles of footpaths and bridleways. The National Association for AONBs (NAAONB) is a charity supported by a small team working on the behalf of the 46 AONB partnerships. The NAAONB has three primary objectives:

- to promote the conservation and enhancement of natural beauty in and around AONBs;
- to advance the education, understanding, and appreciation of the conservation and enhancement of the countryside; and
- to promote the efficiency and effectiveness of organisations promoting or representing Areas of Outstanding Natural Beauty.

1.2 This year has focused on the delivery of an interim business plan designed to bridge the gap between this strategic planning cycle and the next. With uncertainty over the outcome of the Glover Review in England, an imminent Comprehensive Spending Review, and the unexpected global pandemic, hindsight has validated the NAAONB's decision to take this approach.

2.0 High-level challenges for the NAAONB

2.1 The outgoing strategic plan highlighted three main high-level challenges for the National Association, which are outlined below.

2.2 Devolution and the complexity associated with working within and across different national political and legislative frameworks. The difficulty for the NAAONB is to identify where and how to focus limited resources to best effect, how to generate political support, and how to access funding to drive the work of the charity in Wales. Working closely with the Welsh AONB partnerships, the National Association has unlocked a package of measures designed to increase the level of parity between AONBs and National Parks, including a grant to the NAAONB to support the employment of a Wales Development Officer.

- 2.3 This post has proved crucial in strengthening collaboration across AONBs in Wales and has allowed the NAAONB to renegotiate the way the charity works in Wales. The post will allow the NAAONB to drive forward a Wales specific work programme that both informs, and is informed by, parallel programmes of work in England. Enhanced devolution has increased the richness of thinking and the creativity of approach across all the AONB partnerships. Limited resources haven't allowed the NAAONB to attempt something similar for Northern Ireland, but this will be considered in the production of the next strategic plan.
- 2.4 Public sector reform, and increasing competition for public funds, continues to be a significant issue for the NAAONB. The National Association continues to place great weight on working differently and supporting collaboration between the AONB partnerships. This year this has included the conclusion of the 'Taking the Lead' programme, and the development of a new collaborative programme of work, funded by AONB partnerships in England and co-ordinated by the NAAONB. Effective collaboration has also taken place outside of these programmes including work to deliver on the Colchester Declaration and progress the 'Art in the Landscape' project. The NAAONB's collaboration around nature recovery includes a deepening relationship with Natural England and the recruitment of a Nature Recovery Coordinator to support all the AONB partnerships in their own individual and collective efforts.
- 2.5 Withdrawal from the European Union has presented the NAAONB with several challenges and opportunities. The NAAONB has worked hard to ensure that emerging domestic legislation reflects the interests of AONB partnerships, and it has worked with others to optimise opportunities for AONBs, including advocating for strengthening the duty of regard to the AONB purpose(s).
- 2.6 The NAAONB also supported an amendment to include reference to landscape in the Agriculture Bill. The purpose of this, and its associated advocacy, was to position the AONB management plans central to any post-Brexit agricultural support mechanism and facilitate the targeting of support payments to help conserve and enhance natural beauty. The NAAONB collective response to government, through the 'Farming for the Nation' document, resulted in the funding of a programme of Tests and Trials designed to inform ELMS and provide valuable data and insight to the government.

3.0 Other work

- 3.1 The NAAONB has been awarded a contract to deliver an advocacy and training programme for designated landscape staff, working with AONB and National Park teams across England. It also continues to support discussions resulting from the UK Government's Landscape Review and has provided data, evidence, and insight to inform discussion and ensure that decisions are made based on a sound understanding of how the AONB partnerships and the NAAONB operates.
- 3.2 The NAAONB has also strengthened its relationship with Natural England, initially coming together around a collaborative approach to nature recovery, but more recently widening this commitment through a joint statement with Natural England and National Parks England that reaffirms the intention to work together to conserve and enhance natural beauty.
- 3.3 Work with the National Parks also continues, with regular meetings and action around areas of shared strategic interest.

- 3.4 The NAAONB has continued to increase its role celebrating AONBs and natural beauty by maintaining its relationship with Simon Armitage, the Poet Laureate, and it has extended this work to include a collaboration with The Poetry School. Co-ordinating the enthusiasm across the AONB partnerships to support The Laurel and Ginkgo prizes has improved the National Association's reach, relevance, and impact, and will help it look at different ways of bringing landscape to a new audience.
- 3.5 The National Association has also begun to explore options it can be more inclusive in the ways it operates. This is not just a response to the moral and ethical imperative, and the fact that AONBs are designated by the nation for the nation, but also to drive the necessary innovation, creativity, and challenge upon which effective governance relies.
- 3.6 Inevitably COVID-19, and the associated response, has had an adverse impact on the NAAONB as many of its sources of unrestricted income rely on the running of events such as the national annual conference and training workshops, all of which were cancelled. However, it has allowed an opportunity to run events in different ways and widen the potential audience for its work.

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