**APPENDIX 30:**

**Public Representation of Downlands Action Group, 9 September 2022**

**From:** Downlands Action Group [redacted]
**Sent:** 12 September 2022 15:08
**To:** planning
**Cc:** Peter Waldock; Town Clerk - Uckfield Town Council
**Subject:** Downlands Farm Objection WD/2022/1637/MEA
**Attachments:** Objection_Downlands Farm_Downlands Action Group WD2022_1637_MEA.pdf

Dear Mrs Turner
cc North Ward Uckfield District Cllr Peter Waldock
cc Town Clerk, Uckfield Town Council

Please find attached the objection from Downlands Action Group with reference to 424 houses on Downlands Farm hay meadows, ref WD/2022/1637/MEA

[redacted]

Yours sincerely
*Downlands Action Group*

[redacted]

c/o 4 Claremont Rise, Uckfield TN22 2AH

9th September 2022

Downlands Action Group
Objection to Downlands Farm Planning Application 424 houses
Ref. WD/2022/1637/MEA

Dear Mrs Turner

Downlands Action Group wishes to register our continued strong objection to the development of Downlands Farm and object to this new planning application for 424 houses.

The strength of local opposition to this development application is demonstrated by the volume of objections, all of which cover the significant harm the community wishes to avoid for a cherished and well-loved area.

The community objections are material planning considerations and describe the unsustainable nature of this proposed 424 house development including the roads, traffic, services, schools, doctors, dentist, water supply, sewage infrastructure, harm to Lake Wood, harm to the environment and biodiversity, harm to the wildlife and harm to the ancient woodlands and woodland corridors surrounding Downlands Farm.

The severity of the impact and loss of this vital green space to the local community has not been assessed.

15m buffer zones around irreplaceable habitats of ancient woodland should mean that there is no access to the fields via Thirty Acre Wood or through Fir Tree Grove, and 15m buffer zones around Longwood Gill and Shermanreed Ghyll should ensure they are not within the SANG zone. Woodland Trust planner's manual indicate larger buffer zones of 50m and 100m which would mean no access from the proposed bypass roundabout and the proposed emergency access fails on all irreplaceable habitat buffer zones.

The following provides information for refusal as material planning considerations with reference to landscape, cultural history, heritage, ecology, freshwater habitats, environment, UK BAP habitats and UK BAP species considerations, the size of the Downlands Farm site, Landscape assessments, national planning policy framework considerations, ancient woodland, and deciduous woodland information.

Yours sincerely,
*Downlands Action Group*
[redacted]

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## OUTLINE

### Previous Judicial Review - Material Planning Consideration

Downlands Action Group helped defend Downlands Farm during the last planning appeal and wish to submit the previous application, appeal, Inspector's letter to the Secretary of State, Secretary of State refusal, Wealden WDC officer reports and the other information held on file via the WDC planning portal reference WD/2006/2855/MEA (link here Planning and Building Control - Wealden District Council)

This last refusal is a Material Planning Consideration for refusal.

The application and previous WDC officer notes are essential as they highlight areas and examples of habitats which are missing from this next planning application.

There are omissions in this new attempt at a planning application, hence our request that the application WD/2006/2855/MEA is included as a material consideration. The applicants have failed to appreciate the scale of importance of the irreplaceable ancient woodland, UK BAP habitats and UK BAP species.

This new planning application for 424 houses (and possibly another 424 capacity as additional notes within their application) conflicts with the policies in the WDC saved local plan 2013 and environmental and countryside saved policies including other WDC planning policies, all of which provide protection for heritage, countryside, landscape, the environment, biodiversity, ancient woodlands etc.

### Downlands Farm

Downlands Farm is in Uckfield North Ward, East Sussex, Wealden District Council. Downlands Farm is in rural open ancient countryside and overlooks the Ashdown Forest SAC SPA SSSI and Area of Outstanding Natural Beauty, AONB.

Downlands Farm long standing grassland habitats and hay fields overlook the medieval historic area of Maresfield.

It is an ancient High Weald farm and woodland landscape surrounded by ancient woodland and ancient ghyll streams and provides headwaters to Shortbridge Stream.

Downlands Farm is also adjacent to three Local Wildlife Sites and a Local Geological Site.

Downlands Farm was part of the Streatfeilds of Uckfield landed gentry estate from the late 1700s. Uckfield was formerly a 'ville' of Buxted. Downlands Farm is alongside the A22 and the entrance to this grand estate is largely intact and includes the Streatfeilds carriage drive from Budletts Common and Downlands Farm, past the lake to Buckswood Grange Grade II listed building.

The Streatfeilds are of historic importance to the County area and one of four significant families in the County during the Victorian era - Lord Sheffield of Sheffield Park, Buxted Park, Manor of Maresfield and the Streatfeilds of Uckfield.

This is important in relation to this planning application as the Streatfeilds are responsible for the carriage drive and built "The Rocks," now known as Buckswood Grange, which is a Grade II listed building. The Streatfeilds carried out engineered adaptations to the natural environment to create the William Gilpin inspired Picturesque Rural Park and lake Garden called Lake Wood, now a local nature reserve owned and managed by the Woodland Trust.

Lake Wood is steeped in history from the Mesolithic era 8-10000 years with sandstone rock shelters and recorded flints and blades from this era. The area including Downlands Farm and Lake Wood can rightly be regarded as a heritage rural park and garden which should receive the same protection identified in the Landscape Character Assessments for rural parks and gardens as it is of ecological and historic significance.

The amenity value, the landscape setting, the beauty, and tranquillity of Downlands Farm connected to Lake Wood has been undervalued in this planning application and the application fails to conserve and protect this heritage and fails to conserve and protect the ancient landscape of Downlands and therefore fails to comply with local and national framework policy.

The carriage drive was created around 1790 and the lake designed shortly after; the lake and the Streatfeild design included Downlands Farm and remains intact, included in the landscape design was the location of Rocks Road, which was used to bring commerce from Lewes via the Streatfeilds canal and wharf at Shortbridge.

The 1829 Figg estate maps of the Streatfeilds estate and the Figg maps of Buxted Park show how these County estates are both historically important and identifies the magnificence of both these estates beside each other at Budletts Common, London Road.

The 1829 Figg maps include Downlands Farm and the ancient and well-preserved medieval landscapes including that of the common of Malling Budletts. Downlands Farm as part of the Streatfeilds estate was recorded in 1829 on an estate map and a further map of Malling Budletts.

These maps are important because they show Downlands Farm is largely intact two hundred years later and therefore the historic cultural heritage, ancient woodlands and ecological continuity is proven without doubt.

1829 Streatfeilds Figg estate Map Downlands Farm, Shermanreed and Malling Budletts




*Figg 1829 (Source The Keep ADA 229-02) one of a series of estate maps for the Streatfeilds showing Downlands Farm, Snatts Road, Rocks Road, the 1790 carriage drive from Lake Wood to Budletts, Longwood Gill, Shermanreed ghyll, Downlands Farm Shaw, Thirty Acre Wood, Fir Tree Grove.*

The 1829 Figg maps were used to inform the 1841 Tithe maps of which Downlands Farm and Malling Budletts common is recorded in 1841 as part of the Streatfeilds estate. The carriage drive remains within the Downlands Farm site but has not been under conservation under the current stewardship allowing degradation to this heritage asset of County Importance to Uckfield.

Downlands Farm is historically and ecologically linked to Lake Wood and Budletts due to its ecological heritage from the Mesolithic era (8-10000 years) and the ancient and medieval

landscape providing ecological continuity from this era to 2022. Downlands Farm runs from the side of Fir Tree Grove and the side of Lake Wood to the carriage drive at London Road, Budletts Common.

Downlands Farm is identified in the WDC SHELAA as unsuitable for development. This followed the rigorous review at the public inquiry which culminated in the appeal decision concluding in 2009. This is a material consideration in favour of refusal of the current application.

The developers are now attempting to divide the Downlands Farm site in two. Approximately one half has been put forward in this latest planning for 424 houses (the last application was for 750 houses).

Fragmenting ancient woodlands within the Downlands Farm from its ancient landscape setting and dividing it from its historic and ecological continuity and heritage would cause considerable loss, harm and deterioration of ancient woodland and woodlands from the 1800s.

This development would cause harm to the freshwater ecosystem, ecology, landscape, and heritage. There would be harm to the ancient woodlands and to a mosaic of UK Biodiversity Action Plan (UK BAP) habitats. These habitats support many endangered and UK BAP species of importance.

## Fails presumption in favour of development

The planning application for 424 houses, including the omissions, fails to comply with local planning policy and the National Planning Policy Framework. The application does not qualify as sustainable development within the criteria of the NPPF, therefore this application does not benefit from a presumption in favour of development.

Relevant development plan policies, and issues, other guidance and previous evidence in respect of Downlands Farm include the following:

- The Wealden District Core Strategy Local Plan, February 2013
- The saved policies from the previous WDC Local Plan
- The proposed development is outside the development boundary within the Core Strategy Local Plan. The application fails Chapter 4 and Chapter 5: protecting the environment and countryside policies.
- The application fails **NPPF 2.8: ecology**
- The application fails **NPPF 15: Conserving and Enhancing the Natural Environment**
- The application fails to meet the recommendations of the **Wealden 2022 Landscape Character Assess: Area 6D: High Weald**: this is a key link within the Biodiversity Opportunity Area
- The application fails to meet the policies of **DEFRA 2022: Keepers of Time**
- **Experts in ecology and habitats** have assessed and commented on the character and quality of Downlands Farm and its immediate surroundings. These experts include Dr Martyn Stenning, Professor Beebee (SSSI assessment for amphibians, reptiles and great crested newts). Assessments by these experts provide vital evidence confirming the application should fail due to its impact on ancient woodland, ecology, habitats, and the species contained within them.
- Downlands Farm provides ecological functional connectivity between habitats and is an essential link with the much-needed Biodiversity Opportunity Area for corridors of habitats and species and therefore the application fails to meet the BOA requirements.

- The application has failed to recognise the historic importance of the environment, the heritage and has even missed the rural park and garden of the Streatfeilds and the connecting c1790 carriage drive shown on mapping and images used for this planning application, and therefore fails **NPPF 16: Conserving and Enhancing the Historic Environment**.

## WDC May 2022 Landscape Assessment: Biodiversity Opportunity Area

Lake Wood, Budletts and Downlands Farm site are part of the High Weald Biodiversity Opportunity Area and landscape corridor forming a wider context which should not be divided and should not be separated from its wider historic and ecological continuity - see the appendices.

## National Planning Policy Framework NPPF 2021

The application also fails to meet the policies contained within the National Planning Policy Framework in terms of its treatment of ecology and historic assets. It fails to conserve or enhance biodiversity as it would cause loss, deterioration, and harm to ancient woodland contrary to national and local policies. The application is unable to ensure biodiversity net gain - contrary to the developers' assertions.

Causing harm to irreplaceable habitat means that net gain is not achieved, within the terms of the NPPF. The developers have even suggested 'translocation of ground flora' in Fir Tree Grove, apparently to suggest that the proposal could amount to sustainable development. It is no such thing. Fir Tree Grove is an ancient woodland. Disturbance to this woodland, including creation of a boardwalk, presumably mounted on posts which would be pile-driven into the sandstone rock, would be inappropriate and very damaging in such an area. This is an irreplaceable habitat, which needs to be protected from avoidable harm. The local objectors have strongly shown, by the objections which they have lodged to the applications that they do not wish any harm to come to this area.

## HABITATS

## Ancient Woodland and Deciduous Woodland Priority Habitat Inventory

The developers own notes state that there is loss to ancient woodland, as if it is inconsequential (developers' own paragraph 4.10).

Ancient Woodland is an irreplaceable habitat and cannot be replicated in this lifetime.

The standing advice of Natural England and the Forestry Commission includes guidance on Plantations on Ancient Woodland Site (PAWS), Wood Pasture and Parkland. The advice documents state that these areas should benefit from the same degree of protection. Ancient woodland may be open; newer woodlands on ancient woodland soils may also be identified by the presence of ancient woodland inventory (AWI) ground flora species. The public is familiar with many of these AWI ground flora species: the most recognised ancient woodland indicators being wood anemone (a slow coloniser of AWI) and the famous English bluebell, as well as dogs' mercury, wild primrose and wild daffodil to name a few. These species are present in Downlands Farm in considerable numbers.

Wood Pasture and Parkland is also identified on MAGIC maps as Priority Habitat. The developers' desk-based masterplan has omitted reference to this. It appears that this plan has referenced stands of oak trees as 'scrub.' This fails to understand the historic records of Downlands Farm, going back to the 1600s, which demonstrate the pedigree of this ancient woodland corridor. The omission of this issue from the desk-based studies of the developers is striking, when the issue has previously been identified at Downlands Farm, including references in the WDC officers' reports attached to the previous application.

Downlands Farm ancient woodlands and Budletts Common have been identified as Critical Natural Capital and of County Importance by ecologists who gave evidence in the previous application concerning Downlands Farm. The latest application has failed to identify this critical county important site. The Critical Natural Capital includes the corridors of ancient woodland, ancient wet woodland and ancient woodland ghylls.

Fragmentation of ancient woodland means causing irrevocable loss, harm and deterioration to this nationally important habitat and wildlife corridor which links the Woodland Trust nature reserve at Lake Wood, through Budletts, to Buxted Park SSSI. The corridor also provides links to the Woodland Trust reserve at Views Wood. Preservation of this corridor is needed, to conserve and provide protection to an important part of the identified Biodiversity Opportunity Area (BOA).

Downlands is pivotal in this BOA and is a stepping stone and link between habitats to be protected as part of the NPPF and local plan policies.

Downlands Farm provides a valuable and essential resource for the Local Nature Recovery Strategies required by government policies. The LNRS strategy should include maintaining the links between West Park LNR and Lake Wood, including Downlands Farm and Budletts Common medieval landscape. The strategy should keep the connection between Budletts and Paygate Wood, Roundwood to Buxted Park (which contains a Grade II* listed building), a national medieval monument, an SSSI and Views Wood.

Since the previous Downlands Farm planning application, the protection of ancient woodlands has been given additional emphasis through the NPPF, and more changes are expected following the recent Environmental Bill. The House of Lords' Amendment 100 suggested 50m buffer zones to protect ancient woodlands and further enhanced protections are being reviewed.

WDC does have a share of the remaining 2-2.5% of the UK ancient woodland remaining and it is submitted that this natural resource across Downlands Farm must remain protected.

There is increasing knowledge of habitat and species decline. Government is recognising this via its widely known consultations as to the need to protect and halt this decline. New Policies to enhance protection of these vulnerable habitats have been announced in the updated DEFRA May 2022 document regarding woodlands, entitled "Keepers of our Time".

Additionally, there is a new national initiative to update the existing desk-based maps by 2024, to capture the unrecorded woodlands of the 1800s, wood pastures, parklands and ancient woodland areas which are missing from the national AW inventories on MAGIC maps.

This initiative should apply to Downlands Farm to ensure the unrecorded PAWS and irreplaceable habitats and missing UK BAP Priority Habitats across the ancient Downlands Farm area are finally recorded for the desk-based study maps.

If the current application is refused and goes to appeal, Downlands Action Group will provide evidence to any public inquiry of the historically documented Downlands Farm ancient woodlands from the 1600s. This evidence will demonstrate that the desk-based studies and maps used for the masterplan are inaccurate and that ancient woodland is in danger of being removed because it is not recorded on those studies and maps, contrary to standing advice protecting ancient woodlands.

It is well known from research (see examples on the Woodland Trust website) that fragmentation and development are among the most severe forms of harm to ancient woodlands. The same is true of changes to the hydrology of these woodlands, including wet/ghyll ancient woodlands, which are irreplaceable habitats (wet woodland is also a UK BAP habitat).

In mitigation hierarchy the first step is to AVOID harm to ancient woodland and to choose a less sensitive site for any development. This first step of AVOID has evidently been disregarded in the drafting of the current application.

The Woodland Trust tree planning manual suggests that there should be 50m and 100m buffer zones to protect ancient woodland. The WT provides research papers demonstrating why maintaining connected ancient woodland habitats is key to their survival and advising that SuDs should not be placed where they change the hydrology of ancient woodlands.

This current application has circa 13 SuDs in two fields. Despite this, the application has overlooked the presence of the rare peat-fed lake in the centre of Lake Wood, Gormanston large pond ,aquifer springs, and the headwaters to Shortbridge Stream. All of these affect the hydrology of ancient wet woodland ghylls.

The application fails to acknowledge that water chemistry and hydrology changes will affect these multiple ancient woodland habitats, together with the headwaters, priority pond habitats, bogs, ditches, streams and ghylls. The peat-fed lake, WFD Shortbridge Stream and other priority freshwater habitats will also be affected by this proposed development.

Downlands Farm should not be developed. WDC planning officers clearly expressed that view in response to the previous application (see paragraph below). The scale of proposed mitigation is inappropriate, as development at Downlands Farm should be avoided altogether. Mitigation on the scale suggested in the application would not alter the fact of irreversible damage to the landscape, sensitive ecosystems, and habitats. Even the proposed scale of mitigation would not be adequate in this exceptional environment.

The planning officer for WDC stated in relation to the previous application (Paragraph 286: "*…. adequate mitigation has not been proposed. The impacts on ancient woodland, and on great crested newts, dormice and other fauna would be contrary to national and local policies. Given the availability of other sites, Downlands should be ruled out of contention as a housing site on ecological grounds alone."* These comments remain valid. The present application would degrade and cause loss, harm, and deterioration to these valuable Critical Natural Capital areas. Downlands remains unsuitable in terms of the ecological impact alone to Downlands Farm, quite apart from the damage which would be caused to adjacent habitats supporting endangered species.

The National Planning Policy Framework outlines that: "development *that results in the loss or deterioration of irreplaceable habitats, such as ancient woodlands, ancient and veteran trees should be refused unless there are wholly exceptional reasons."* There are no wholly exceptional reasons here. Downlands Farm is too sensitive to development change and the scale of so-called mitigation suggested will itself result in harm.

## Extracts from May 2022 DEFRA policy updates

The application fails to meet the policy guidelines published by DEFRA in May 2022 which were established to update "Keepers of Our Time". This is because of all the direct and indirect harm which this development introduces, including fragmentation of the woodland environment, inclusion of ancient woodland within SANGS and a huge volume of proposed recreational disturbances. The application would also cause harm to the environment needed by UK BAP species, including the endangered hazel dormouse and red list species

## DEFRA extracts

*"We will improve the ecological condition of ancient woodland and ancient and veteran trees, ensuring they are appropriately managed for the long term. We will conserve the rare, threatened or priority species that rely on ancient woodland, such as **dormouse** and pine marten. We will reduce the pressures on ancient woodland, and ensure they are more resilient to the threats of climate change, pests, and disease. And we will value ancient woodland and ancient and veteran trees, making sure they are recognised for their natural capital and cultural value, and making an increasing contribution to our health and wellbeing. In this way we can ensure we hand over these irreplaceable habitats in a better state for the next generation.*

*Our ancient and native woodlands and ancient and veteran trees are immensely rich habitats. Highly valued by their owners and users, many are declining or threatened. Sustainable management is key to realising their potential.*

*There are also more widespread environmental changes that can threaten woodland and cause deterioration of habitats. For example, diffuse pollution and functional isolation of woodlands from other woodlands and semi-natural habitats as the built environment expands nearby.*

*Fragmentation*
*Many ancient and native woodlands are very small and have become increasingly isolated from other semi-natural habitats. This fragmentation means that if a species disappears from a woodland, there is no nearby source from which it can recolonise. This can also affect ancient and veteran trees. The intensification of agriculture and increased pressure from development over recent decades has **exacerbated** the **effects** of **isolation**. Many of the species associated with our woody habitats are poor dispersers and the current lack of habitat connectivity will lead to them being threatened as their 'climate space' moves and changes.*

*Development and boundary incursions*
*Development can threaten ancient and native woodlands. Woodland can suffer loss and deterioration if houses or roads are built too close to it through damage to soils, roots and vegetation, and changes to drainage.*

*Development can also cause indirect effects including:*

- *increasing disturbance to wildlife from noise, light pollution, and domestic pets*
- *cutting back of trees and shrubs along the woodland edge*
- *the expansion of adjoining gardens into the woodland margin*

*Development also increases the occurrence of other effects listed in this section such as fragmentation and overuse by people.*

*While we have made progress on protecting these trees and habitats from loss and improving their ecological condition, there is still more to do. The need to protect and improve ancient and native woodland and ancient and veteran trees for people, nature, climate, and the economy is still as relevant today as it was in 2005.*

*Throughout this document, when we refer to ancient woodland we are referring to all habitat types that sit within this category. Unless otherwise stated, this includes:*

- *ancient semi-natural woodland*
- *plantations of ancient woodland sites*
- *ancient wood pasture and parkland*
- *infilled ancient wood pasture and parkland*

*Protecting and enhancing ancient and native woodland and ancient and veteran trees will contribute to achieving the Government's proposed environmental targets, such as the tree canopy and woodland cover target.*

*The value of ancient and native woodlands and ancient and veteran trees*

*England's ancient and native woodlands and ancient and veteran trees support high levels of biodiversity. They are home to a quarter of England's priority species for conservation. They also deliver many ecosystem services including water and soil regulation, carbon storage, support for people's wellbeing and their long-standing cultural values.*

*MAGIC … This dataset is not complete and ancient woodland may be present on sites, even if not included on the ancient woodland inventory.*

*Ancient and veteran trees, including in wood pasture and parkland, are particularly threatened by:*

- *inappropriate agricultural management and other land management activities*
- *soil compaction*
- *ploughing in the root zone*
- *agricultural chemicals, including on neighbouring land*

*Dogs can disturb wildlife and cause enrichment of soils if owners do not remove dog waste. "*

Comment: The volume of dogs introduced into this tranquil environment via two car parks and 424 houses will change and enrich the woodland soil composition and add to pollution and contamination of the headwaters during rain as it washes off the fields and soils into the ghyll headwaters.

*"Safeguarding landscape context*

*Our strategic objective is to recognise, protect and enhance the value of ancient woodland and ancient and veteran trees in our landscape.*

*Ancient woodland and ancient and veteran trees have been a feature of our landscapes for centuries. They provide an important sense of place and local distinctiveness to landscape character which we must protect. Where activity such as intensive agriculture and development*

*takes place near these habitats, we should consider adequate buffer zones to protect the resource from harm.*

*To safeguard the landscape the Government will:*
*9.1 Make sure the management and creation of ancient and native woodland conserves and enhances the local distinctiveness and landscape character.*
*9.2 Avoid and minimise the effects of intensive land uses such as…..”*

Comment: The fragmentation of habitats and the buffers suggested are inappropriate in this location.

## UK Biodiversity Action Plan Habitats and UK BAP Species

The harm to a mosaic of unrecorded UK BAP habitats supporting a rare assemblage of UK BAP species is contrary to NPPF policies protecting habitats and species of importance. We refer you to the planning officers’ evidence to the previous public inquiry, where there are lists of the identified habitats. These are not shown on the desk-based studies submitted with the current application.

UK BAP Habitats are also Habitats of Principle Importance, HPI, for Conservation under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

## Freshwater habitats

Downlands Farm includes a naturally functioning freshwater ecosystem and headwaters to Shortbridge Stream. This stream is one of the most important in the area for sea trout spawning and European eel migration. The stream appears to not have suffered from recent sewage contamination, unlike many other local watercourses, making it even more important.

This is the type of freshwater environment that national consultations by DEFRA and other bodies are trying to protect, in an effort to ensure that species and habitat declines are halted.

Lake Wood is a rare peat-fed lake receiving freshwater from Downlands Farm. Downlands Farm and its surroundings contain multiple UK BAP priority pond habitats, wet woodlands, bogs, ditches, old woodlands from the 1800s, unrecorded Parkland and Wood Pasture and unrecorded UK Biodiversity Action Plan Priority Habitats (UK BAP). These were identified in the last planning application but are not referred to in the desk-based studies submitted by the applicant now.

Downlands Farm, Budletts and North Uckfield is a rare High Weald environment in that it is largely undisturbed and in itself has qualified for UK BAP species protection, due to this lack of disturbance and the existence of its tranquil ancient woodland environment. North Uckfield, including Downlands Farm is of County and National importance and should not be fragmented.

The proposed roundabout which would provide the main access to the development sits on groundwater and surface water, as shown on the blue infrastructure map. The scale of change proposed to the freshwater habitat and headwaters includes changes which would affect Lake Wood, Longwood Gill, Shermanreed Ghyll, Shortbridge Stream and Butchers Wood. The construction of the access road and roundabout would cause the fragmentation of ground and surface water.

The fields' water run-off and wet habitats during winter are a noticeable and valuable feature. The Downlands woodlands, fields and land is likely to absorb and act as a conduit for more water than the river 'pipe' in Uckfield town centre, which is monitored for flooding during extreme events. The woodland ghylls are best witnessed during rain and the wet seasons. The ghyll waters rise and freely flow, and one ghyll has a waterfall.

The field water adjacent to Lake Wood flows rapidly out of the ground and has created its own ditch exactly where the proposed roundabout and access road is. This is partly shown on the blue infrastructure map next to Lake Wood and the A22.

The fields remain extremely wet and hold significant amounts of water during the winter and wet months. The flow of water from these fields in all directions is remarkable, and is, exactly what one would expect of a natural, undisturbed environment fully functioning freshwater habitat which has so far been undisturbed by development and the creation of new access points.

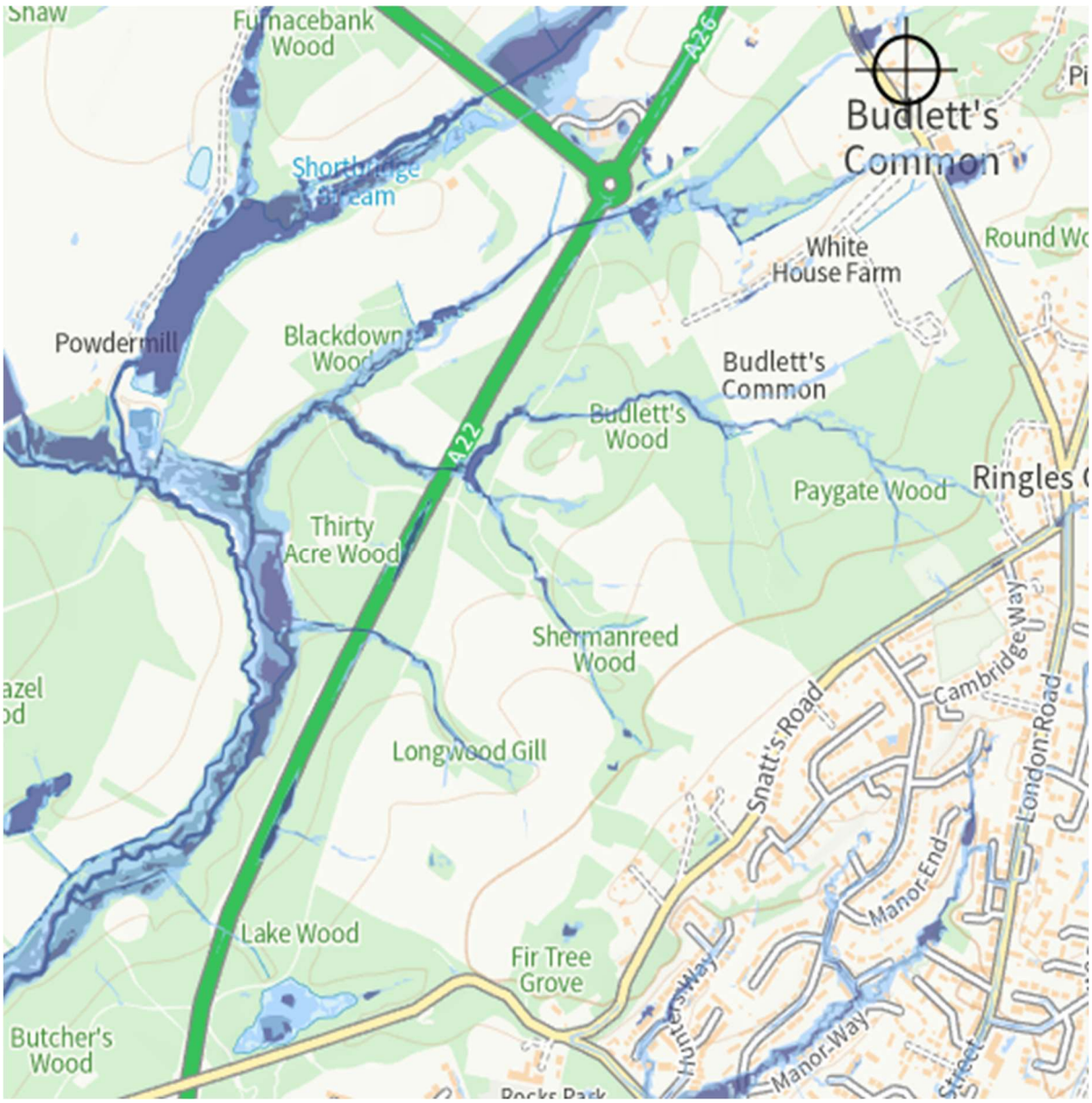
This can be demonstrated by the fact that even a new 'test' hole bored by the applicant's surveyors has now developed its own aquifer fed spring. This has such a great water flow that it has created its own ditch/gully downhill.

The water near the surface seeps through the ground and sandstone to the lake and ghylls.

Rain and surface water also flows off the fields to the lake and ghylls. The rainwater can be seen flowing to the lake from the ancient carriage drive (a feature which has been ignored by the applicant) and from the top of the lake's ghyll.

See the LiDAR maps for evidence of these ghylls and confirmation that they are lower in the landscape than the field topography. Two of the Ghylls and an alder carr are also unrecorded on the desk-based study maps.

Freshwater Habitats and ecosystem - Blue Infrastructure Map




*This blue infrastructure map, when compared to the following LiDAR maps, shows the ancient, connected landscape and fully functioning freshwater ecosystem. Downlands Farm connects Lake Wood to Budletts Common through the fields and ancient woodlands and is an integral part of the Landscape Character Assessment linking the Biodiversity Opportunity Area. The woodland is continuous from Lake Wood alongside the A22 bypass, through Thirty Acre Wood to Budletts Common and Budletts Wood, providing a continuous canopy for the endangered hazel dormouse and other UK BAP endangered species. This woodland habitat on MAGIC maps is of high spatial biodiversity priority and a priority woodland continuous habitat.*




*The proposed roundabout is at a point where water collects off the fields. This will add to high levels of groundwater next to the bypass. Shortbridge Stream is nearby. The harm the roundabout and new access road will cause in this location is a material planning consideration and fails to conserve and protect the ecology, the environment, and the heritage landscape.*




*This map shows the surface and groundwater where the proposed roundabout is located, at the intersection of 3 LWS (Butchers Wood, Lake Wood, and Shortbridge Stream). Shortbridge Stream is at the closest point, meandering next to the A22. The surface and groundwater flows from the fields to*

*priority UK BAP pond habitats, ancient wet woodland ghylls, Lake Wood, Longwood Gill, Budletts Wood, Shermanreed Wood, Butchers Wood, Thirty Acre Wood and Shortbridge Stream.*

## LiDAR Maps

These LiDAR maps are available online: source: [Side by side georeferenced maps viewer - Map images - National Library of Scotland (nls.uk)]

In the LiDAR image below can be seen Lake Wood, Gormanston, Fir Tree Grove and Downlands Farm Shaw, the ancient carriage drive and in some cases, the ancient woodland outlines.

In the following LiDAR image one can see the significance and scale of the Mesolithic sandstone rock outcrops and the structure of the ancient woodland ghyll of Lake Wood and how the ghyll reaches the Downlands Farm fields and the fields surface and groundwater of the lake.

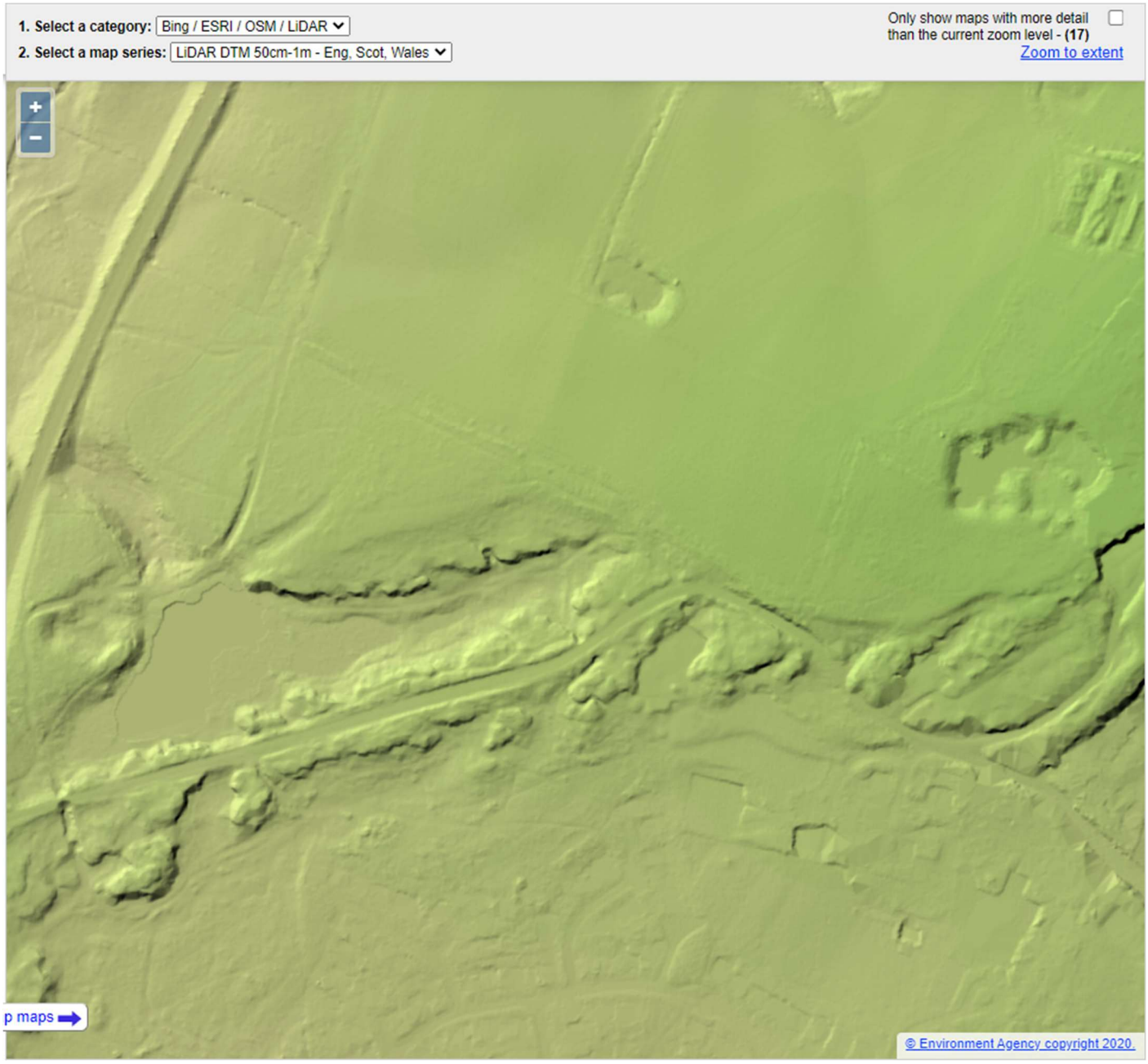
The carriage drive route is clearly visible as is the ancient woodland.

The Downlands Farm Shaw AWI holds a significant priority pond in terms of amphibians, reptiles and great crested newts meeting SSSI criteria (see the evidence of Professor Beebee, submitted to the previous public inquiry.) This is unrecorded ancient woodland (evidence available).

Fragmentation of Downlands Farm Shaw priority pond habitats, and habitats used by the county important site for amphibians, reptiles and great crested newts, by the construction of roads and hundreds of houses would irrevocably harm this landscape.

This development would be highly detrimental to the area's biodiversity, habitats and vulnerable species and would disconnect the habitat from Lake Wood and the sizable pond of Gormanston, removing an important link for species needing this landscape to move freely. This would fail to protect endangered species from further loss and decline, contradicting a direct government initiative which is aimed at achieving that objective.

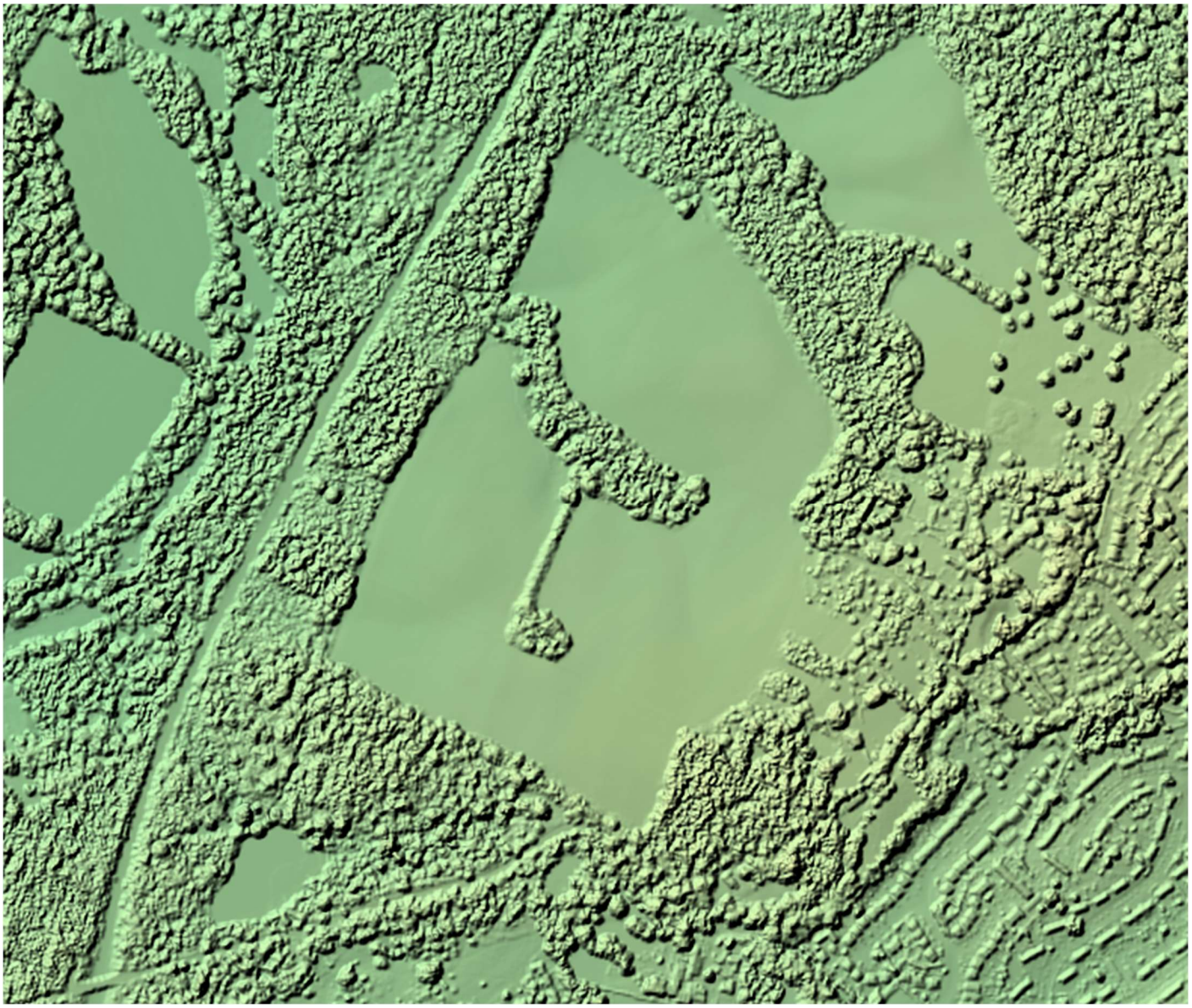
## LiDAR Lake Wood, Gormanstan pond, Downlands Farm Shaw, Carriage Drive




*Above, LiDAR image of Lake Wood ghyll, Downlands Farm Shaw, Gormanston large pond, Fir Tree Grove and the sandstone rock outcrops of Chicory Cottage, Rocks Road, and the end of Snatts Road. This proposed development proposes to fence off Lake Wood from its natural habitat. This is inappropriate and would prevent species moving between the fields and ancient woodlands.*

*The proposed development will fragment a habitat for amphibians and reptiles described as county important and meeting SSSI criteria.*

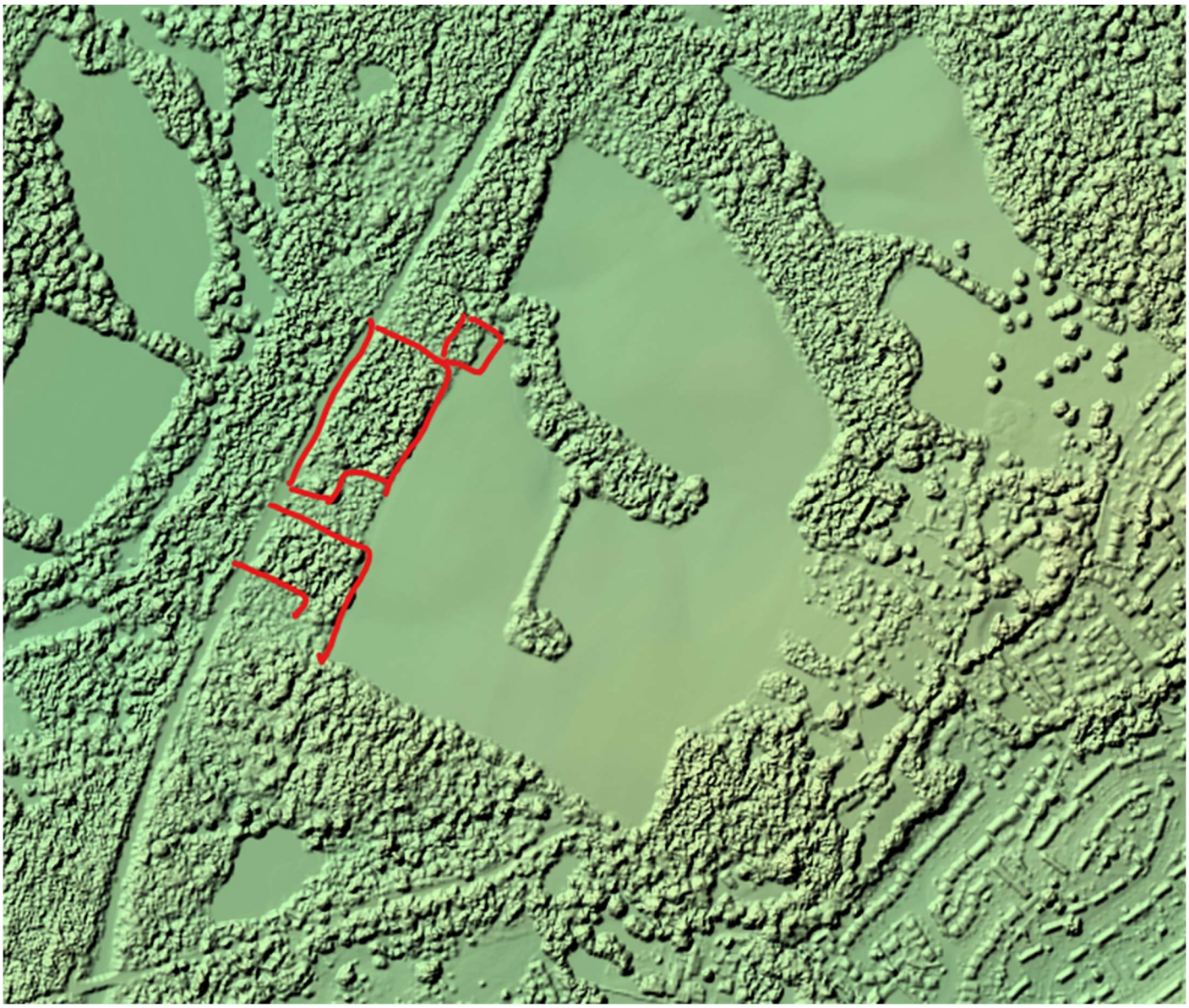
*The LiDAR below shows the connected ancient woodland corridors and the 3 PAWS along the A22 corridor adjacent to Lake Wood LWS LGS and Longwood Gill and Downlands Farm Shaw*



*Above LiDAR image shows the location of the roundabout and the A22 car park with unrecorded ancient woodland (visible when comparing LiDAR to MAGIC AWI). Areas of unrecorded ancient woodlands and Downlands Farm Shaw are missing from the MAGIC inventory.*
*During spring, one can see from the bypass carpets of bluebells and wood anemone. These are well known indicators of the presence of ancient woodland soils and their ground flora.*

## Unrecorded Ancient Woodland

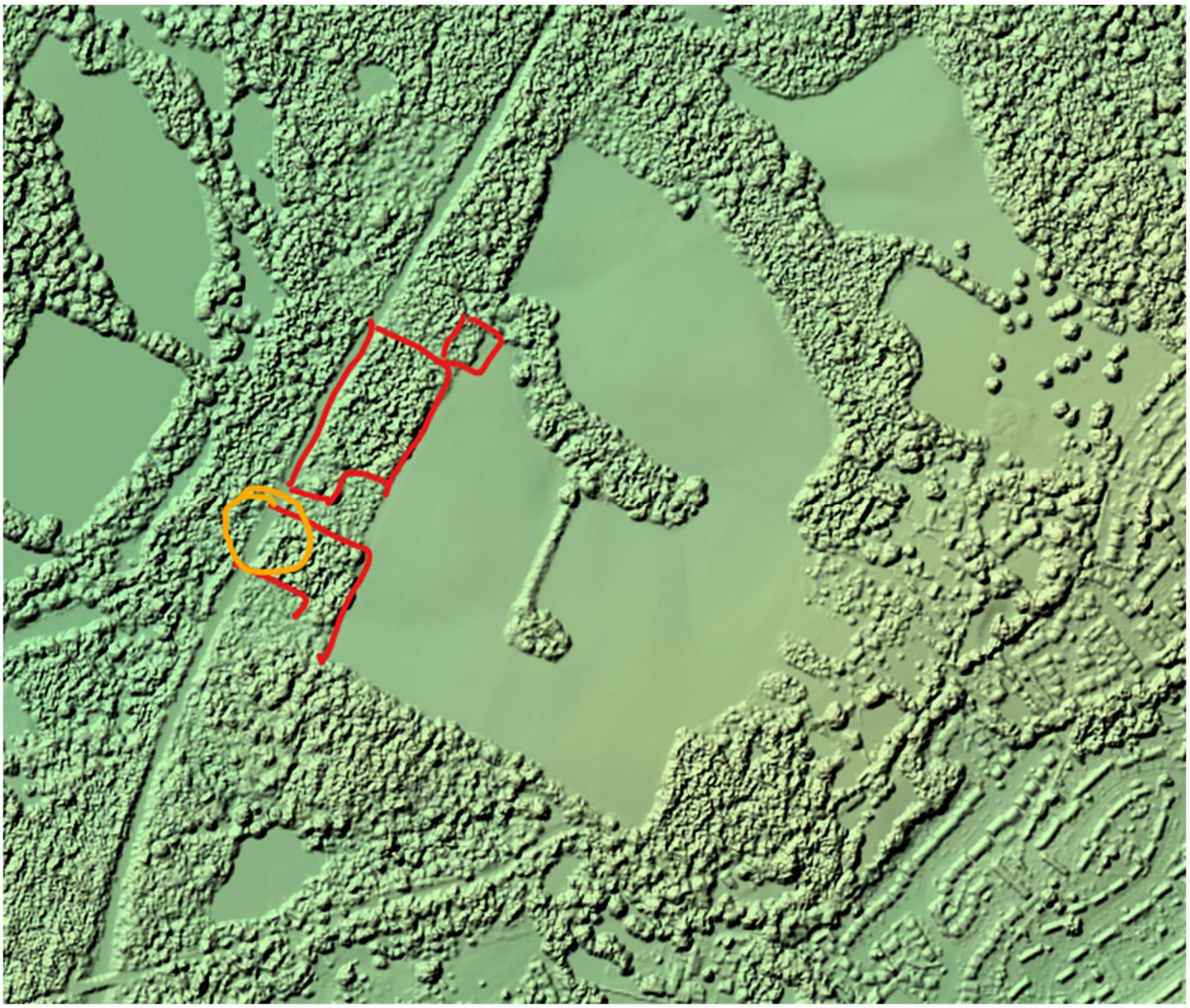
Our belief is that these ancient woodlands with carpets of bluebell and wood anemone remain unrecorded on MAGIC and demonstrated clearly during spring with the ground flora present of an ancient woodland site/soil. The map evidence and historic documents can be provided.



*A22 bypass and Thirty Acre Wood. The areas of unrecorded ancient woodlands are outlined in red. PAWS are present within the three gaps. Standing advice indicates that these should benefit from the same protection as ancient woodland irreplaceable habitats.*

*Notwithstanding, ancient woodland cannot be replicated in our lifetime, the fact that AWI ground flora species is present along this Thirty Acre Wood corridor should mean that the utmost care and caution should be demonstrated and the soils protected as if it were under the habitats directive and precautionary principles for rare habitats of principal importance and very old woodlands connected through this downland heritage landscape.*

## Roundabout and access road through unrecorded ancient woodland



*The orange circle shows the approximate location of the proposed roundabout which would cause loss and harm to the ancient woodland corridors. 215m visibility splays and hedgerow assessments appear not to have been included in the BNG reports. Another omission is the quantity of woodland and habitat that would have to be removed to create this splay.*

*A new roundabout on the A22 serving the nearby development of 1000 homes which are under construction at Owlsbury, and Ridgewood Farm provides a clear demonstration of how much habitat is removed in order to create a new roundabout. As shown by the LWS maps of Shortbridge Stream, Lake Wood and Butchers Wood, the proposed roundabout is not sustainable and would cause irreparable damage to key priority habitats.*

*The proposed cycle path on the A22 also begs the question how much habitat alongside Lake Wood would be removed. This habitat forms part of the wildlife corridors which support this side of Lake Wood.*

*The emergency access proposed, is unacceptable placed within 15m buffers of ancient woodland.*

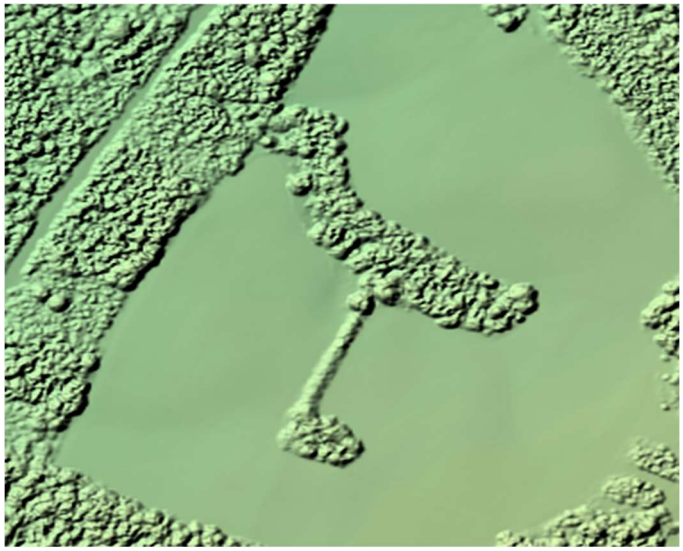
The LiDAR image of Lake Wood above can also be compared to this aerial image above the lake to clearly demonstrate the beauty of this ancient landscape. The aerial image also confirms that an ancient woodland corridor is not accurately shown on the developers' masterplan, or the MAGIC desk-based studies used. This woodland corridor is ancient and irreplaceable.

## Aerial image of Lake Wood, Downlands Farm and the ancient woodland corridor



*Aerial image of Downlands Farm, Lake Wood, Downlands Farm Shaw AWI, Longwood Gill, Thirty Acre Wood, and unrecorded ancient woodland, the A22 bypass, Butchers Wood, Fir Tree Grove, Shermanreed Ghyll. The fields are higher than the lake in Lake Wood. Continuous woodland canopy, UK high spatial priority and woodland high priority habitats*

*Longwood Gill and Downland Farm Shaw AWI LiDAR*



*this image highlights the ancient woodland and old woodlands. The ground flora with carpetsof wood anemone, bluebell, dogs' mercury, wild primrose, wild daffodil and should be protected from division and fragmentation, woodland rectangles which are missing from the map databases, also ancient woodland of Longwood Gill and sunken ancient track missing from the AWI*

## Longwood Gill

We refer to the surveys produced at the previous inquiry, which categorise this ghyll as meeting criteria of national importance regarding rare inland flora.

The harm which would be caused by development in close proximity to this irreplaceable habitat and wet woodland ghyll, including placement of the base part of it in a SANG and to effectively try and divide Longwood Gill, this is extraordinarily severe.

The area of Longwood Gill next to the A22 has an incredible ghyll topography which also contains a significant volume and depth of water which will not be safe to the ghyll and walkers of the SANGS. To encourage recreational disturbance of a ghyll and add this part of the ghyll to the suggested SANGS is at odds with policy to ensure ghylls are not managed or harmed due to their rarity and international importance.

Ghyll habitats should not be 'managed' or manicured. The process of creating the proposed SANGS access, meeting health and safety requirements, and the car park adjacent to these vital old woodlands, there are great concerns the connected woodland canopy between Longwood Gill and the ghyll parts of Thirty Acre Wood will also be 'managed' and divided. Creating additional access in these ancient woodlands, the potential to further fragment the habitats of principle importance affecting the environment of the endangered hazel dormouse, a species of principle importance, which comprehensively use these connected woodlands. Will this divide more habitats used by the dormouse, let alone the volume of disturbance in this previously hidden and tranquil woodland.

We believe Longwood Gill and its sunken ancient track (not shown by the applicant) area meets Local Wildlife Site status. In the spring the banks of the ancient sunken track have wood anemone, a slow coloniser of ancient woodland, and another part of the ancient woodland missing from the applicant's inventory.

Carpets of Wood Anemone The Longwood Gill carpets of wood anemone cover the base of the ghyll and can be seen from the A22 bypass. Cycling, walking and disturbance by volumes of people accessing a SANG indicate Longwood Gill in its entirety should not be placed in the proposed SANG. This is due to the harm which would be caused from the sheer volume of increased recreational pressures, including the likelihood of off-road cycling.

The proposed car park near Longwood Gill and the volume of visitors it would be likely to attract would irrevocably harm an ancient woodland ghyll and its headwater streams, including the EU Designated Shortbridge Stream.

See also the LiDAR Maps section and aerial images of this significant ancient wet woodland ghyll.

One of the basic online LiDAR maps follow, it is understood that geology specific tools are more detailed, but this image shows that the ghyll should not be placed in a SANGS with significant harm caused by recreational disturbance, walkers, dogs and mountain bikes.

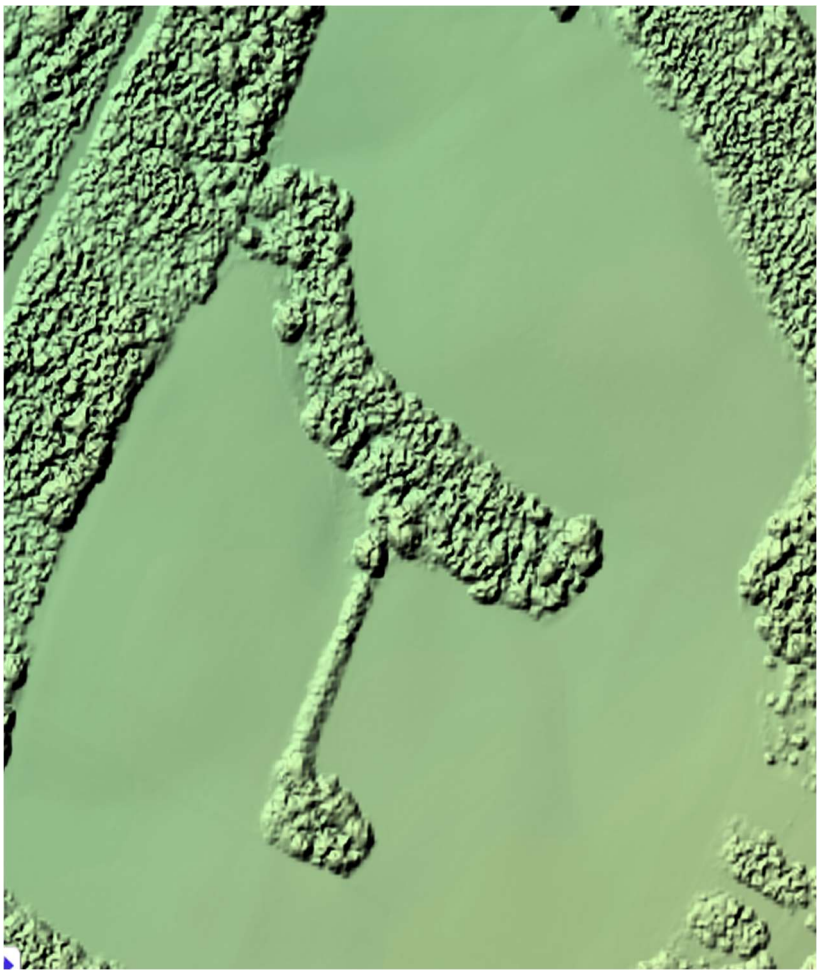
Image shows that Longwood Gill reaches the A22 in Thirty Acre Wood, and the volume of water and ghyll streams flows underneath the A22 Dividing Longwood Ghyll and placing part of it in a SANGS is inappropriate treatment of this rare habitat, to intentionally cause fragmentation of rare habitats, contamination introduced to headwaters of Shortbridge Stream and affects the hydrology, chemistry and flows of ghyll streams and waters. The ancient woodland of Longwood Gill is

inaccurate on the MAGIC maps and extends past the ancient sunken track nearby. Fencing off parts of this ghyll is inappropriate

## LiDAR - Longwood Gill

*Longwood Gill is of international importance, as per the surveys not included in this planning application but available on the WDC portal. The LiDAR shows this ghyll stretches to the A22 bypass and there is deep water and significant flows of water via a culvert to Shortbridge Stream. The ancient carriage drive route is also situated here. This area is extremely wet and deep in winter and this volume and flow of water has been placed in a SANGS contrary to standing advice for the protection of ghyll woodlands. It will need to be engineered to make it safe for recreational use, contrary to all standing advice*

*In the application, Longwood Gill would be fragmented and separated, with parts of it being placed in a SANG and next to a new car park. This is inappropriate for a wet ancient ghyll woodland. The carpets of wood anemone have colonised the banks of the gill and are visible from the A22 bypass. The ancient sunken track is visible on this map and has Wood anemone on its banks. There are no footpaths in part of this ghyll woodland where it is proposed for the SANG, causing loss, harm and deterioration to the carpets of wood anemone*



*Longwood Gill contains unrecorded ancient ghyll woodlands.*

*Longwood Gill and Thirty Acre Wood are also wet ancient woodland and is a HPI (UK BAP Wet Woodland) and an area of woodland connectivity used by the endangered hazel dormouse, the risk of harm should be avoided, and conservation of these intact woodlands is more important than a huge increase in recreational disturbance.*

*Sacrificing HPI is not a recommended solution and undermines the validity of the proposed Biodiversity Net Gain.*

## Longwood Gill and Downlands Farm Shaw should be a Local Wildlife Site

as it is of national and county importance and be a protected ghyll for the LWS conservation of multiple SPI (Species of Principle importance, UK BAP). The ghyll habitat is unrecorded on SxBRC.

## LiDAR - Shermanreed Ghyll

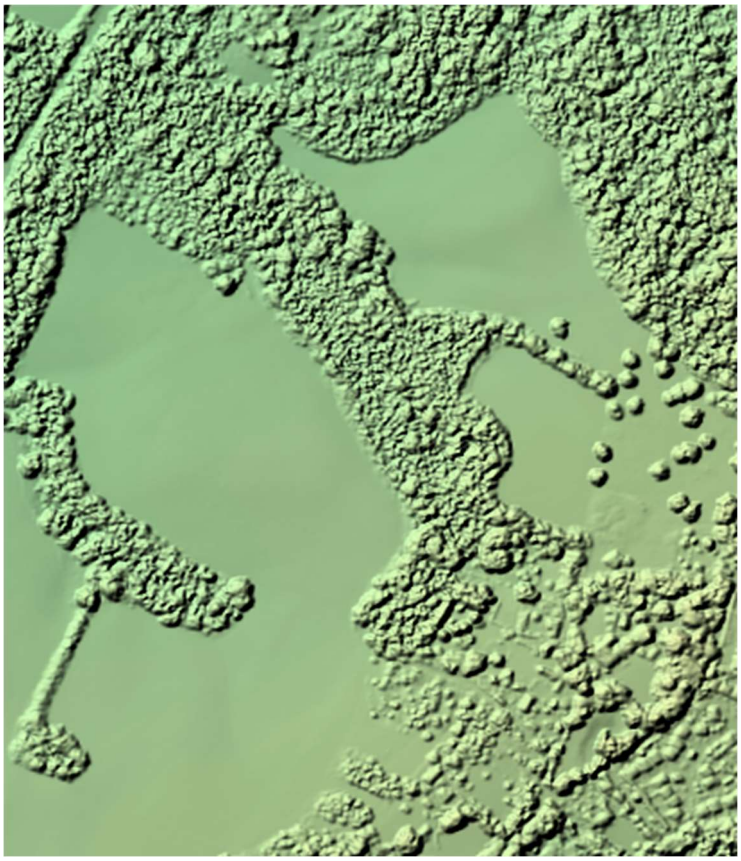
*The proposal to place 424 houses and roads in this ghyll landscape fails to meet the conservation and protection objectives for priority ancient wet woodland habitats.*

*The car park adjacent and placing SuDS in this area  is extraordinary insensitive to this complex old woodland. A rapid increase in construction and then visitor numbers of more than 6000 cars a week is horrific in an environment where only 2-2.5% remains in the UK and is as rare as the Ashdown Forest.*

*Longwood Gill and Shermanreed Ghyll are complex structures, as seen on the LiDAR.*

*Water flows from the fields and ground to these ghyll and headwater streams to Shortbridge Stream. .*

*This also highlights the fact that the myriad and mosaic of ponds, bogs, ditches, springs, and streams across the Downlands area need protection for their important UK BAP habitats which are numerous across the site*



*Wood pasture and Parkland are across Downlands Farm and are not recorded on the MAGIC inventory.*

*This is fully evidenced and noted by the WDC officers reports at the last judicial review.*

*The MAGIC maps are not demonstrating the depth and mosaic of connected UK Habitats of Principle Importance-see the lists below.*

## Shermanreed Ghyll should be a Local Wildlife Site

*due to its county importance, ancient woodlands and priority pond habitats*

## MAGIC Maps

It is important to note that the MAGIC system used for the desk-based studies used by the applicant remains provisional (as also stated by DEFRA) and that Downlands Farm holds ancient woodlands, PAWS, wood pasture, Parkland and UK BAP that are not recorded. The applicant's studies have failed to acknowledge the wider context of the area, the intrinsic beauty of this landscape and that it is a coherent ecological environment. Great weight should be given to protecting and conserving this area from harm by fragmentation.

Knowledge and forensic examination from the previous application appears not to have been applied by the developers. The same goes for the local information provided by local objectors at the previous public inquiry. This material includes articles of the eminent Dr Stenning and his written evidence to the inquiry, together with the evidence of Professor Beebee.

The provisional MAGIC maps have not been updated with the previous findings. These are historic and ecologically important corridors represented from Lake Wood to Budletts, including ancient and well-preserved medieval landscape, Lake Wood as a William Gilpin inspired historically important Picturesque Rural Park and the lake and Garden of Buckswood Grange Grade II listed building.

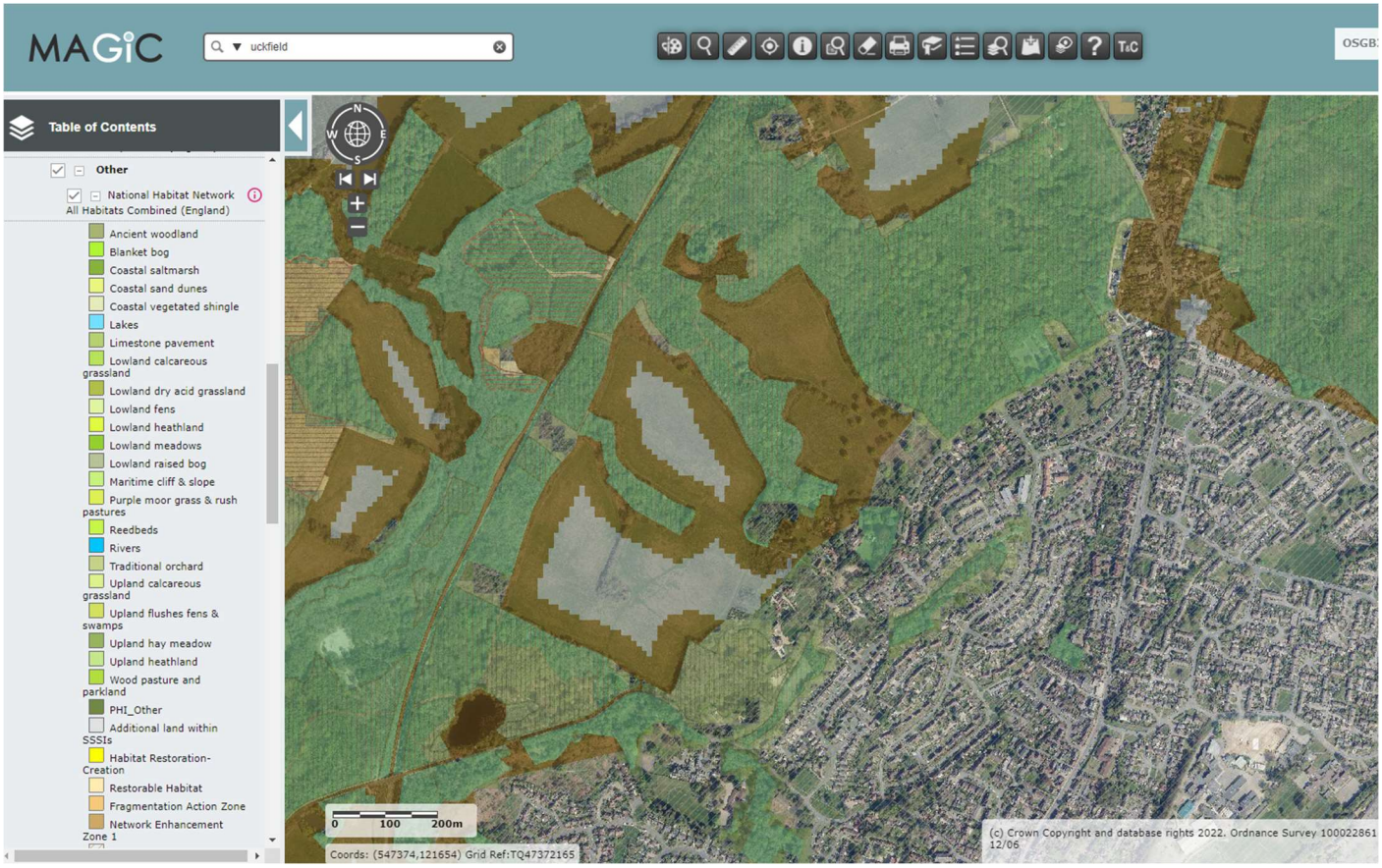
The public inquiry into the earlier Downlands Farm application identified irreplaceable habitats, Wood Pastures, Parkland and UK BAP Habitats which are also included the definitions of Habitats of Principle Importance HPI. These habitats are still missing from the MAGIC mapping system, together with

- eutrophic standing waters,
- aquifer fed springs,
- hay meadows,
- lowland mixed deciduous woodland,
- lowland dry Acid Grassland,
- lowland heathland,
- wet woodland
- plantation on ancient woodland site
- woodlands of the 1800s
- Priority Ponds,
- Priority Streams and river,
- Priority Lake,
- Purple Moor grass and Rush Pastures,
- Inland sandstone outcrops,
- Restorable heathland (the same type as Ashdown Forest of which only 2-2.6% remains in the UK, equally as fragile as ancient woodland to recreational disturbance and cycling)

It is a fact that these habitats are all present and have previously been referred to.

These habitats are noticeable by their absence from the MAGIC desk-based system used to create the masterplan which is a key part of the current application. This seriously undermines the credibility of the masterplan.

MAGIC map shows the number of missing UK BAP habitats not on desk-based surveys




The fact that important ecological features are missing from desk-based studies is evidenced simply by using this menu option of MAGIC maps for Downlands Farm.

These features include unrecorded PAWS and missing ancient woodland in the vicinity of the proposed roundabout and road access through woodland. The list above highlights the missing mosaic of these crucial UK BAP / HPI. Fragmenting the wider landscape is inappropriate in this location.

The MAGIC maps index above shows it is missing a rare peat fed lake (Lake Wood), lowland acid grassland, heathland, lowland meadows, purple moor and rush pastures, rivers (Shortbridge Stream), wood pastures and parkland priority habitats.

This MAGIC map shows the high spatial layer for priority woodland habitat and demonstrates why a roundabout and access road would divide this important woodland corridor.

It is neither acceptable nor sustainable to create this degree of harm to the landscape, to achieve the development proposed.

All these UK BAP habitats have been identified in the last WDC planning officer reports.

It is unrealistic therefore that the likely harm to irreplaceable habitats, which are core elements of a Local Nature Recovery strategy, it is unlikely that the development will be able to achieve meaningful BNG as required by national planning policy.

## Ashdown Forest AONB SSSI SAC SPA Common

Visitor numbers are increasing on Ashdown Forest. Visitor pressure will be increased by existing planning permissions which are in the process of being built out: these will result in around 1600 additional houses in Uckfield, Maresfield and Buxted, all of which will have easy access to the Ashdown Forest.

Downlands Farm is close to Ashdown Forest. The construction of 424 houses within circa 5km of the Forest will add further to the visitor impact. The inclusion of SANGS in the application will do little to counter this, due to the volume of housing proposed. Recent surveys and car park consultation exercises confirmed that annual visitor numbers have increased by 150,000 during recent years.

Ashdown Forest is an AONB of international significance. Local authorities have a duty to protect it. The impact on the Forest of these ever-increasing visitor numbers has not been accurately assessed.

Friends Clump is an iconic group of mature trees which stands on one of the higher areas of Ashdown Forest. This feature is easily seen from Downlands Farm (and vice versa) and is particularly important to protection of this landscape setting.

**The 100-year anniversary of the creation A A Milne's classic Winnie the Pooh character, closely associated with the Forest, is likely to draw many visitors to Wealden to share this remarkable milestone and medieval landscape.**

Views from Ashdown Forest would be affected adversely by the intrusion of an Uckfield building site spilling out onto a previously rural unspoilt ancient landscape.

The development boundary for North Ward Uckfield is Snatts Road. This application is outside of that boundary and is in open countryside. Permitting major development here would be contrary to national and local policy.

Protection of the visual amenity of internationally recognised Ashdown Forest is an imperative.

**The application fails the due regard which should be given to the core components of natural beauty in relation to planning of development for towns and villages within and adjacent to the AONB.**

## Site of Alternative Natural Green Space (SANGS)

The proposal includes placement of ancient woodland and ancient ghyll woodland in a SANG, together with provision of two car parks. Recent experience with another local SANG car park indicates that these can be expected to attract some 6000-7000 cars each per month. The proposal is for the creation of 424 households. These households would inevitably bring domestic pets with them. Domestic cats and dogs would cause major disturbance to and predation of rare, endangered wildlife. The proposal includes provision of cycling in ancient woodland, which would be likely to destroy rare ground flora, particularly as the woodlands across to Budletts are open and not divided. This is extraordinarily insensitive and shows a lack of due regard to the exceptional area of open interconnected ancient woodlands.

The mosaic of different types of NVC class of ancient woodland types also seems remarkable, including an unrecorded alder carr.

These ancient woodlands provide a natural intrinsic beauty of depth, tranquillity, and character. They provide an essential rural identity and landscape setting between Maresfield and Uckfield.

Development would harm the very essence of these irreplaceable habitats. Ancient woodlands remain with only 2-2% in the UK being as rare as the Ashdown Forest heathland.

To suggest placing a mosaic of ancient woodland irreplaceable habitats in a SANG to offset increased visitor numbers to the Ashdown Forest, causing harm to multiple ancient woodlands, to LWS and LGS is at complete odds with the needs of any of these habitats.

## Lack of Conservation is no reason to develop

During the inquiry into the previous planning application, it was stated by the previous application and the executors running the Downlands Farm estate, that it was wholly unmanaged.

The Inspector conducting the inquiry considered that a lack of conservation was not a reason to approve development in this important landscape.

This remains true to this day. Degrading sensitive irreplaceable habitats and UK Biodiversity Action Plan habitats by lack of conservation is not only irresponsible but should make it even more important that this Downlands Farm site be moved to a Conservation Area within the next local plan.

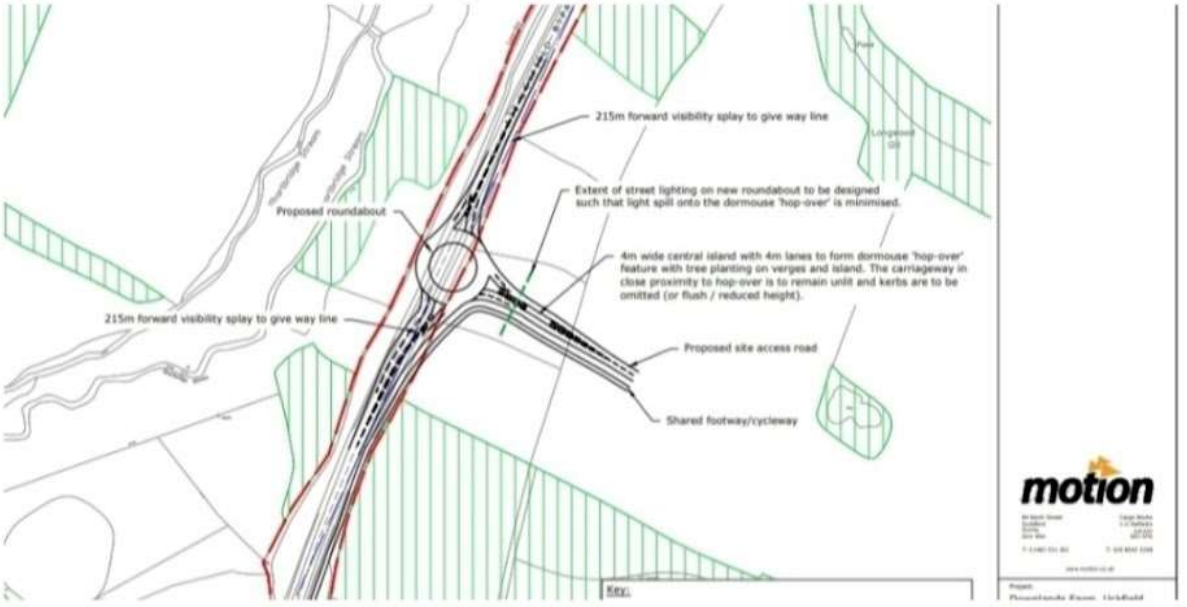
It is also national policy that lack of conservation is not a reason justifying development or affecting ancient woodland.

## Proposed Roundabout

The location of the proposed roundabout and access road cuts through unrecorded ancient woodland identified by carpets of ancient woodland ground flora such as bluebell, wood anemone and dogs' mercury interspersed with wild primrose. This is entirely inappropriate, as is access with 215m visibility splays. The masterplan has failed to adequately identify how much ancient woodland would be removed and harmed to create this roundabout and access.

The roundabout and access impacts Shortbridge Stream and Butchers Wood AWI. Butchers Wood is also a Local Wildlife Site at the place of this roundabout. Lake Wood is also a Local Wildlife Site which should be a sanctuary supported by Downlands Farm. Nearby is a further LWS called Shortbridge Stream LWS. To place a roundabout between three Local Wildlife Sites in unrecorded ancient woodland would cause harm and loss to all these environments, contrary to local and national planning policies framed to protect these very environments.

*The proposed roundabout and access road removes unrecorded ancient woodland and AWI ground flora of significance. The roundabout fragments and cuts through irreplaceable habitats as seen in this aerial photograph (copy of roundabout image from developers' proposals)*






**NPPF 179 Habitats and biodiversity - sandstone rock outcrops geodiversity and biodiversity**

NPPF 179 is aimed at protection and enhancement of biodiversity and geodiversity.

The application has failed to fully acknowledge the significance of the inland sandstone rock outcrops as a feature of this landscape. This is believed to be a UK BAP habitat and a habitat contained in the ghyll woodlands.

Evidence to support this can be found in the surveys of Longwood Gill and its unique micro-climate supports rare species. These demonstrated nationally rare findings, including a waterfall during rain in sandstone rock outcrops, together with gill water and wood anemone in ancient woodland at the base of this ghyll. Areas of this quality should definitely not be placed in a SANG, where harm, loss and deterioration would be likely to occur. This would be contrary to all local and national policy for ancient woodland. This is a wet ghyll, ancient woodland. This is a habitat type which the Wealden Landscape Assessments state should be protected from development.

NCA Profile:122 High Weald - NE508 (naturalengland.org.uk)
The sandstone rock outcrops discussed within **NCA122 / NE508 / SE02 policy** are significant additional features which need protection. The application fails to maintain and enhance the geodiversity and especially the exposed sandrock and therefore the planning application fails to meet the requirements of NCA122. This Downlands landscape falls within the National Character Assessment (122: High Weald). The Snatts Road and Rocks Road sandstone rock outcrops form part of the landscape setting and should remain free from harm or change by development. Any sandstone rock should be protected from change and harm, and this includes the ancient footpath suggested for modifications at the back of Downlands Copse, this is a route of importance and part of the Canterbury pilgrimage route through Uckfield and therefore is of historic importance itself.

**WOODLAND TRUST LAKE WOOD LWS, LGS, VISITORS AND SANDSTONE ROCK OUTCROPS**
The application has failed to consider the current volume of visitor numbers to Lake Wood. The lake and its immediate area are showing signs of stress especially the sandstone rock outcrops being worn, eroded and climbed by increasing visitor numbers. The two SANG car parks are so close to Lake Wood would encourage significantly more visitors than this remarkable rural park and garden can sustain. The development would cause a health and safety issue where walkers try to walk from the Snatts Road or A22 car parks to Lake Wood, Rocks Road /Snatts Road walkers crossing blind narrow bends on Rocks Road where there are no footpaths. There is also a danger that users of mountain bikes would be tempted to cycle from Downlands Farm and into Lake Wood, causing damage to the nature reserve. The nature reserve is no fishing, no swimming, no camping etc. The harm to sandstone rock outcrops is already evidenced by the wear and erosion on sandstone rocks and tree roots now exposed from the increase of visitor numbers climbing where once there were no routes. This is unsustainable.

In addition, West Park LNR is also no cycling due to its status as a nature reserve and Uckfield council have done all they can to avoid this impact. However, it is already noted that cycle trails and tyre marks are appearing in both Lake Wood LWS and West Park LNR. Introducing the scale of cycling nearby will only increase this issue.

**Geodiversity**: The High Weald's sandstone rock outcrops are important geological features and support nationally rare ferns, mosses, liverworts and lichens, a living legacy from the climate most of Britain experienced around 4000 bc. This Downlands site stores and sequesters significant

amounts of carbon. **The NCA122 states** ***"Additional Opportunity 1 is to Protect and maintain the sandstone outcrops and other geological features of the High Weald to promote greater understanding of geodiversity and the contributions that they make to the cultural heritage of the area"*****.** The Downlands farm application has failed to recognise the importance of these important geological features and should be refused based on these significant features across the landscape.

The Streatfeild family created Rocks Road as part of their Lake Wood and Buckswood Grange design. The stays from their foot bridge remain in the rocks, as do the engineering hidden gems of access under Rocks Road.

Chicory Cottage, which features in the application, is believed to contain sandstone rock outcrops and these should also be protected from harm or change by development. Surveys of other local sandstone rock outcrops have shown them to meet LWS criteria for lichen, moss, and bryophytes. It appears that the applicant has no such surveys of the sandstone rock outcrops across the site, which are most likely to hold rare and endangered species due to the ecology of the area. Butchers Wood, one of its sandstone rock outcrops, may be one of only nine similar habitats remaining in the UK, containing a rare species of moss. The sandstone rock areas should be assessed properly.

The Local Geological Site LGS for earth sciences for Lake Wood shows the presence of a ghyll which does not appear on the map records. This falls within **NPPF 179 for enhanced geodiversity protection**.

**The sandrock geology of the High Weald is of International Importance and shared with only the northern part of the Isle of Wight NCA and parts of Boulonnais and Pays de Bray in France which therefore means the requirement contained in the NPPF to protect geodiversity is of great relevant to Downlands Farm, and in fact is of national importance.**

## Lake Wood - Picturesque Rural Park and Garden, Local Wildlife Site, Local Geological Site, Species List

The assemblage of species at Lake Wood is, we believe, of national importance. We refer to the objection to the application lodged by Dr M Stenning on the 12th of August 2022.

The applicant has failed to understand the importance of this species rich habitat.

Development would remove the supply of water to the lake and fragment the lake's natural freshwater hydrology and its water catchment. The process of development would be likely to introduce contamination and pollution of groundwater, causing irrevocable change and harm to this historic park and garden of importance.

Separating Lake Wood, a recognised Local Wildlife Site and Local Geological Site (formerly a RIGS) from its natural environment would cause irrevocable harm for all the species present within it. Disruption of the water catchment for the peat-fed lake, and fragmentation of the whole area including the fields and the grasses of the hay meadows which have been in place for hundreds of years can only cause harm. We refer to Dr Stenning's articles and objection letter, together with the evidence which he gave at the previous inquiry. We also refer to the evidence of Professor Beebee, who identified that the Downlands site met SSSI criteria for amphibians and reptiles.

An example of protected species in Lake Wood is that of European Eels, which are present there. The European Eels migrate to and from the Sargasso Sea via Shortbridge Stream and the River Ouse and is one of life's remarkable migration events. The European Eel is a UK BAP, IUCN Red list UN Critically Endangered species. The surface and groundwater hydrology from the Downlands Farm catchment area affects both Lake Wood and Shortbridge Stream.

As identified in Dr Stenning's letter of objection, the historic and ecological continuity of the lake stems from the Mesolithic era (8-10000 years ago) and has an immense pedigree and ancient landscape through the medieval era.

The historic importance of the lake increased in the Victorian times with a c1790 carriage drive running from Budletts Common round the lake to Buckswood Grange, a Grade II listed building. Queen Victoria reputedly used said carriage drive to visit the Streatfeilds family estate as one of the eminent landed gentry owners along with the nearby Buxted Park. The Streatfeilds created the William Gilpin inspired picturesque peat-fed lake. The Streatfeild family also owned Shortbridge Wharf and Canal, which were used to bring commerce to Uckfield. The family constructed Rocks Road to facilitate this. Rocks Road had tunnels and foot bridges to maintain the picturesque landscape setting of Lake Wood and Buckswood Grange on their estate. Buckswood Grange, Rocks Road, the lake, parks and gardens, Rocks Road wall and the end of Snatts Road junction with its surrounding sandstone rock outcrops are all shown on the estate management maps drawn up by the Figg estate in 1829. The Figg estate also mapped Buxted Park, showing the importance of the Streatfeilds estate. These maps provide evidence of the historic designs and ancient woodlands, all of which remain largely intact in 2022. In planning terms, this is a historic environment which should have the full protection of the policy going forward in the emerging new local plan. The damage likely to be done to these historic features conflicts with local and national planning requirements.

Wealden District Council's proof of evidence for the previous inquiry stated at paragraph 226 that development "*will cause devastating fragmentation. Some species would disappear altogether, while others would be reduced to critically low levels … the effects of the development will spill over into important adjacent habitats …. Including ancient woodlands and sandstone rock outcrops."* This statement remains true today.

The harm which the development would cause to heritage, landscape, habitats and species is a material consideration which should outweigh the presumption in favour of development.

Lake Wood - as a LGS it is also an unrecorded ghyll we believe that this is likely to meet national importance criteria. It may even be of international significance due to its peat fed lake. The photograph below shows the dark tinged water of the peat fed lake, lying at a lower elevation than the Downlands Farm fields and surrounded by ancient woodland. Rocks Road, created by the Streatfeilds as part of the landscape design, is also visible in the photograph.

## Peat fed lake, sphagnum bog, alba lily

The lake is a peat-fed lake with a sphagnum bog (another rare habitat reliant on its freshwater hydrology remaining unchanged). White Alba Lily covers half the lake.

This is a rare peat-fed naturally pH balanced lake.

The LiDAR maps show how the topography of the ghyll reaches the fields proposed for development and the lakes catchment area. Higher resolution geodiversity maps show this very clearly. The lake's supply of freshwater comes from the surface and groundwater of the meadows of the Downlands Farm hay fields. The fields are higher in the landscape than the lake, and therefore part of Lake Wood's freshwater catchment area. Downlands Farm is also part of the catchment area within the EU Designated Water Framework Directive, as is Shortbridge Stream. Contamination or pollution of the headwaters would be contrary to the Water Framework Directive for surface water and groundwater

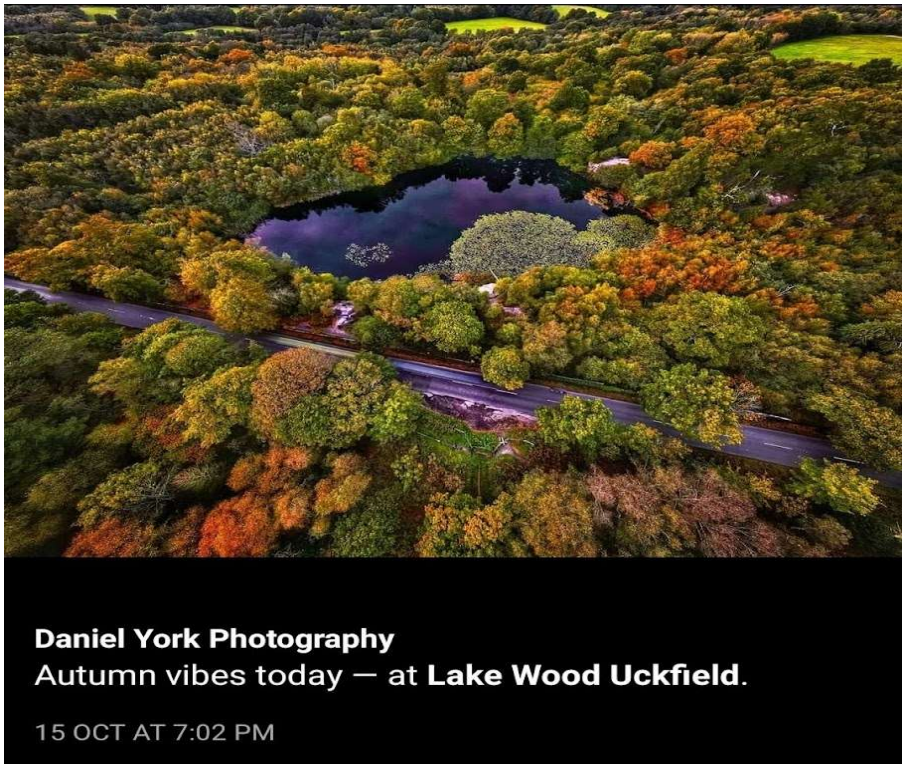
## Impact Risk Zone to protect Lake Wood

**Lake Wood should have its own protection and impact risk zone** similar to that of the Buxted Park SSSI and its National Monument. This is a significant conservation nature reserve, already showing signs of inappropriate use such as graffiti on trees, fishing, camping and wild swimming. This misuse causes significant harm to the water quality and thermocline and the natural pH balance supporting endangered species in the lake, which has a delicate balance of oxygen.

The construction of large numbers of houses for which permission has already been granted in Uckfield, Maresfield and Buxted, together with the likely thousands of visitors every month to the SANG, which is proposed as part of the landscape of Lake Wood, would increase greatly the number of visitors resorting to Lake Wood. This could amount to thousands of walkers and dog walkers per month. Snatts Road and Rocks Road have no pedestrian footpaths and have dangerous bends. Increasing visitor numbers would cause danger and damage.

The sandstone rock outcrops along Rocks Road and Snatts Road should be protected from change for the construction of footpaths due their international significance as NCA122 and Geodiversity protection.

**Woodland Trust Lake Wood LWS LGS Aerial image, Winter**




*Aerial image used with permission of Daniel York and Woodland Trust*

## Local Green Space

The indication from the developers that the current local use of Downlands Farm is causing harm is not justified.

The main harm is lack of intentional conservation by the Executor's who oversee the Downlands Farm estate. This lack of basic conservation is allowing the degradation and impact to irreplaceable habitats, lack of coppicing and degrading many core habitats of principle importance and therefore of conservation importance. The use by local walkers is not causing lack of conservation harm.

The current access is not causing neglect of habitats and neglect is no reason to remove them for development. The hay meadows are beautiful important grass habitats supporting the ecological continuity of the area and enjoyed by the community walking around the edges of the fields and 2 longstanding small pathways.

The objections, wishing to protect this valued green space area by the local community, demonstrate this area has been used as a local green space for decades, accessed by walking from the local area without the need of car parks; some of the local objections have stated unobstructed access for over 30 and 50 years.

Under the developers 1899 map, which also evidences more ancient woodland, to say that informal use is causing harm and yet no conservation without development shows the lack of understanding of the conservation needs of these significant habitats.

The local access and decades of gentle walks respects the well-preserved walking routes which has not disturbed the ancient woodlands or ghylls. This is easily evidenced by walking these routes as also shown on aerial satellite images.

The proposed scale of harm introducing two car parks bringing potentially huge volumes of visitors reliant on using cars, adds an unsustainable situation to the already congested A22. This road is frequently at capacity and to bring cars through Budletts and Ringles Cross and Snatts Road is unnecessary.

Adding more cars, people and dogs (2 x 6000-7000 cars a month) and 424 houses is vastly different from the gentle use currently used as a Local Green Space by the local community who value and treasure this beautiful landscape.

North Uckfield has been able to access this green space for many decades as evidenced by all the objections showing that it has been used as such for over 30 and 50 years.

## SPECIES

UK BAP Species are also Species of Principle Importance, SPI, for Conservation under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

## Halting Species Decline

Downlands Farm meets every government objective to halt species decline as it has the species clearly demonstrated on the Lake Wood species list and the SxBRC species lists.

The Downland Farm surveys are only limited to the days of surveys. The species recorded across this area are not as demonstrated by the applicant's intermittent surveys.

The Biodiversity Record Centres and Lake Wood species lists provide an exceptional assemblage of species not discussed by the applicant, some of which meet National Significance and County Significance. This has been omitted from the applicant's reports.

Other records show that there are more species here than suggested by the applicant - including in comparison to their own previous ecology and habitat reports.

The Uckfield local walkers, some who have walked over this site for 30 or even 50 years, can state categorically that this area is teeming with wildlife and that the wildlife moves around this connected woodland and pond habitat because it is able to move through the woodlands, ponds and hay meadows to find the most suitable habitat during the changing seasons of the year.

Currently, for example, residents of 50 years state that the ghylls and ponds are the driest they have known since 1976 so some of the species have moved to other parts of the ponds and woodland habitats until the water returns. This phenomenon has developed over the last 2-3 years and once the water returns to the ghylls and ponds the species will move back again.

These are fully functioning natural freshwater habitats allowing the species safe sanctuary depending on the conditions. The ghyll and pond habitats will soon return during rainfall after this period of drought.

Walkers can confirm that the area remains as stunning as it was 30-50 years ago (being purchased in 1952). For the hundreds of years, the area has remained mostly unchanged in the corridor from Lake Wood to Budletts from the Streatfeilds of 1784, as shown by the estate maps of 1829 Figg and 1938 Streatfeilds estate map compared to the aerial images of 2022.

This proposed development will cause species decline as identified by Dr M Stenning in his letter of objection.

Downlands Farm will always be an inappropriate development site. It meets the National Nature Recovery, 25-year environment plan and Local Nature Recovery Strategies due to its assemblage of species (not in decline but thriving because of the woodland tranquillity and lack of intervention by humans) and its assemblage and mosaic of irreplaceable habitats and UK BAP Priority Habitats.

Examples of the species and UK BAP Endangered species include: -

## Bats

Please note that the Barbastelle bat in Sussex is scarce and found on the survey of Downlands Farm.

This is recognisably important as this quality of habitat and wildlife corridor supports a wider area and assemblage of bats, more than the bat species identified by the applicant, which is evidenced by other bat surveys, NBMP and other records.

This application would harm the environment which supports a large number of bat species including scarce species in Sussex. It would also harm the bats foraging and commuting habitats including Lake Wood bats.

Lake Wood conservationists have participated in the National Bat Monitoring Programme for decades and this development proposal fragments the habitats supporting this NBMP.

Lighting and disturbance of lights from cars moving through the development and lighting the woodlands and landscape, any sort of lighting (cars, streets, 424 houses ) in this dark sky area would be very detrimental,  and is a material consideration against development, in view of the harm which would result to number of bat species using this high quality woodland and hay meadows for foraging and commuting.

There is no form of lighting which could effectively mitigate this scale of impact. That is due to the volume of cars and their lights, streetlights and lighting from 424 houses which would follow should this application be granted.

The design and volume of housing does not support this rare environment for a large assemblage of bat species. Barbastelles need a variety of habitats and tranquil environment; they are also most susceptible to the proposed development changes.

## European Eel

As per the notes for Lake Wood and Dr Stenning's evidence, the lake is home to European Eel and their migration to the Sargasso Sea via Shortbridge Stream and the Ouse is one of life's remarkable migration events. Returning to freshwater now known as elvers, they migrate upstream to a wide variety of freshwater habitats including Lake Wood. Eels move over wetland to reach some bodies of water.

The European Eel is a UK BAP, IUCN Red listed, UN Critically Endangered species. The Environment Agency is monitoring the return of elvers at Barcombe Mill which is the route to Shortbridge Stream and Lake Wood.

The surface and groundwater hydrology from the Downlands Farm catchment area affects the quality of these freshwater habitats of both Lake Wood and Shortbridge Stream.

## Sea Trout and other red list fish species

Shortbridge Stream is a Water Framework Directive, EU designated salmonid and cyprinid stream. It is also one of the most important sea trout spawning streams in the area and appears not to have suffered from the Southern Water sewage outlets in the area, making this stream (classified as a river) more important for protection and conservation free from risk of harm of contamination, surface water pollution and groundwater pollution to meet the WFD directive.

The Maresfield Conservation Group have a conservation agenda to protect, enhance and support the preservation of this important stream habitat. The ghyll streams and headwaters of Downlands Farm and Budletts all flow to Maresfield Parish where this stream meanders alongside the A22. The proposed roundabout is at the closest point of Shortbridge Stream to the A22. The risk of harm and pollution even whilst creating the roundabout is contrary to all reasonable measures for the conservation of this stream flowing through ancient wet woodlands..

Shortbridge Stream is also home to other red list fish species of principle importance SPI, as recorded on the SxBRC

## Hazel Dormouse

DEFRA policy May 2022 is to protect the woodlands for the hazel dormouse. This animal has suffered a 50 per cent decline in numbers since 2000. The Downlands Farm continuous woodland area supports corridors of hazel dormouse, which may meet SSSI criteria for this species.

The hazel dormouse needs the Downlands Farm good quality ancient and deciduous woodland, hazel and a continuous woodland canopy to move between the various areas which it populates. The habitat which the mouse needs also include scrub and bramble for blackberries. This habitat is found on Downlands Farm.

This charming nocturnal mammal faces many threats and challenges to its continued survival including damage to woodland and hedgerows caused by housing and other development, the decline in coppicing its woodland habitat and changes in agricultural practice.

This application proposes to disconnect continuous woodland and ancient woodland landscape in at least two places along the A22, harming the very environment used on site by the dormouse. Lake Woods has participated in the National Dormouse Monitoring Programme (NDMP). It is clear that fragmenting these important habitats would be very detrimental and needs to be avoided. It is unclear if the SANGS creates more division of the woodland canopy at Longwood Gill and Shermanreed Ghyll also supporting the endangered hazel dormouse.

The proposed emergency access divides a continuous canopy of ancient woodland, contrary to the drawings shown. This canopy is and needs to remain, continuous allowing the hazel dormouse to freely move between the woodlands to/from Lake Wood, Thirty Acre Wood, Budletts Wood, Shermanreed Wood and Longwood Gill.

The damage caused by major development would include introduction of lighting, disturbance, predation from dogs and cats, the presence of 424 houses, changing the current tranquillity of a quiet nocturnal dark skies area and adding thousands of monthly visitors with dogs every month. All of this would cause irrevocable harm for this endangered species. (One SANG locally attracts 6000-7000 cars a month and the application includes a proposal for two car parks and

cyclists/mountain biking) can only cause this species to decline in North Uckfield. This is contrary to best practice policies which aim at halting species decline.

This is an area which we are sure the community of Uckfield would wish to preserve for the survival of the endangered hazel dormouse.

[Hazel dormouse ecology - People's Trust for Endangered Species (ptes.org)]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Water Vole

Due to the freshwater habitats contained within Downlands Farm and the surrounding areas, the applicant should be asked what surveys have been conducted to ascertain whether this endangered species is present in the area. This is quite probable, as it is a suitable habitat for water voles during the wet season.

Deer

The deer population of Downlands Farm roams freely across North Uckfield between Lake Wood and Budletts. By removing Downlands Farm from their natural habitat this will force them to try to cross the A22, Rocks Road and Snatts Road bringing increased danger to deer and the traffic - especially across the A22.

Invertebrates

Downlands Farm is of County Importance for invertebrates and is of interest. The previous surveys at the time of the last planning inquiry identified Invertebrates Downlands and Budletts as meeting County Importance criteria.

The assessment and assemblage of butterflies, moths, beetles, dragon flies are believed to be of significance.

## Amphibians and Reptiles

Please see the 12th of August 2022 letter of objection by Dr M Stenning which includes an assessment of Downlands Farm meeting SSSI criteria for great crested newts, amphibians and reptiles.

## The previous EIA for ponds and amphibians recorded in Shermanreed ghyll

densities.

6.169 **Table 6.7** provides the maximum count on any one visit at each of the six ponds.

**Table 6.7:** *Maximum Numbers of Amphibians*

| | Pond 1 | Pond 2 | Pond 3 | Pond 4 | Pond 5 | Pond 6 |
|---|---|---|---|---|---|---|
| Common Frog | 25 | 38 | 22 | 0 | 11 | 42 |
| Common Toad | 10 | 15 | 0 | 0 | 0 | 22 |
| Smooth Newt | 14 | 12 | 16 | 2 | 3 | 11 |
| Palmate Newt | 2 | 0 | 0 | 0 | 0 | 2 |
| Great-crested Newt | 15 | 31 | 18 | 4 | 5 | 21 |

The ghyll of Shermanreed usually supports GCN as identified in previous studies. Longwood Gill and other parts of the woodlands have standing pond type habitats. Lake Wood and Gormanston support the GCN meta-population and removing the Downlands Farm site from their habitat can only cause irrevocable harm and cannot be successfully managed.

The application includes a proposal to include Shermanreed Ghyll in a SANG. This Ghyll contains 4 ponds suitable for the great crested newt, which is described as a meta-population across Downlands Farm.

Ponds are priority habitats, and where toads are present these pond habitats are among the most important 20% of similar sites in the UK. Placing these habitats in a SANG would irrevocably harm the landscape for amphibians, reptiles and the GCN meta-population.

The significance of the habitats supporting GCN, amphibians and reptiles is another aspect not recorded on desk-based surveys used by the applicant. This is despite the witness statements produced in the previous planning inquiry, from acknowledged experts in the fields of both amphibian and reptile conservation.

The likely impact from a major development on an area of county importance for amphibians and reptiles was confirmed by Dr Stenning and Professor Beebee in their statements to the previous inquiry.

It will never be feasible, with the scale of proposed development, to ensure that the GCN, amphibians and reptiles remain free from harm when the scale of change crosses their connected habitats with thousands of visitors, dog walkers and mountain biking materially harming these priority habitats.

Another example of a species present in this wildlife corridor is the Adder. Adders are in decline and a loss of suitable habitat is threatening this unique species. The adder is recorded from Lake Wood, Downlands Farm, the woodlands and Budletts. From around October to March they sleep in sheltered, dry spots such as old rodent burrows or within fallen trees. They are associated with open habitats such as bracken, heathland, moorland, and woodland edges. The UK's adder population is in serious decline. Habitat loss is thought to be the leading factor in this worrying trend. A development of the size and scale of Downlands Farm would destroy suitable adder habitats, causing one of the county adder populations to become fragmented and isolated. The species is fully protected by law.

## Birds of National Significance

Section 41 (Woodland Bird assemblage) criteria birds are across the area from Lake Wood through Downlands Farm to Budletts. The birds found here meet the species list of importance. Between four and six S41 woodland bird species have been identified across the area. This has not been acknowledged by the applicant.

The area is of national significance for its woodland bird assemblage alone. The farmland bird assemblage is of importance. The habitats are suitable habitat for further woodland and farmland birds of national significance.

The woodland remains largely undisturbed, and development would cause serious ecological disruption to the synergy of the woodlands, fields and ghylls. These are habitats supporting rare assemblages of birds.

The Lake Wood bird species list contains 70 plus species. Sussex Biodiversity Record Centre shows 99 bird species within a 1 km area. In combination, these two lists demonstrate over 100 bird species recorded in Lake Wood and its vicinity.

The number of red and amber list bird species recorded in this area makes this a remarkable assemblage of bird species. These birds need the hay meadows and the woodlands intact to ensure that their population does not decline, and that the area provides a buffer to the other 1600 housing units in the area which have already been approved but not yet built.

**Lesser Spotted Woodpecker** was recorded on the last Downlands Farm EIA and at Lake Wood. The habitats are clearly suitable for the Lesser Spotted Woodpecker as they have also been recorded at Lake Wood. Walkers evidenced 2021 seeing Lesser Spotted Woodpecker in adjacent woodland in Budletts Wood.

**Willow Tit** has been recorded in Lake Wood. These are habitats suitable for these rare birds. Willow Tit has been said to have been heard at Budletts Common, Budletts Wood and Mockbeggars Farm. These woodland habitats should be protected and placed in conservation to enable the habitats for these two rare bird species alone. Conservation to support these birds should be enabled as a priority. A development the scale and mass proposed would result in this habitat unable to support these species, whose decline is due to loss of habitat. The size of the woodlands present on the site means there remains hope these rare species are still here.

**Hawfinch** has been recorded in 2021 at both Lake Wood and Longwood Gill and SxBRC
**Marsh Tit** has been recorded across the site from Lake Wood, Downlands and Budletts
**Wood Warbler** recorded on SxBRC and Lake Wood
**Spotted Fly Catcher** recorded at Lake Wood and SxBRC

It is suggested that the whole area of Lake Wood and Downlands Farm should be designated as a S41 Priority Habitat for Woodland Birds.

Parts of the site have already been designated S41 Priority Habitats and the area is far more important than the developers have suggested.

## OTHER

### Housing Need and cumulative impact

Uckfield, Maresfield and Buxted have fully met and exceeded their development quota identified in the Saved Local Plan of 2013.

The Local Housing Need should have been met as Wealden have unbuilt over 8000 houses for which permission has been granted.

Uckfield has circa 1200 unbuilt and with Maresfield and Buxted circa 1600 unbuilt.

The cumulative impact across this area and Uckfield is severe and has not been adequately assessed. This volume of proposed building amounts to a piecemeal attack on areas of ecological important and heritage assets. The proposal is for major development outside of the existing development boundaries. Respite is needed against this scale of development in the open countryside. The cumulative impact of what is proposed, in addition to what has already been granted permission, needs to be fully assessed.

The cumulative impact on the road infrastructure needs to include the effects of a 166-space car park in Maresfield for a new Marks and Spencer store and another new car park for HomeSense. Permission has been granted for these. The A22 is at capacity and the impact of more cars crossing the Ashdown Forest and rural road network to access M&S and HomeSense is unclear. The increased pressure resulting from the building of 1600 houses for which permission has been granted also needs to be assessed.

The site proposed will be dependent on the car and it is not sustainable, contrary to local and national framework policy.

## CONCLUSION

Downlands Action Group **strongly objects** to this proposed application for Downlands Farm to develop long standing important grasslands and hay meadows (which in the UK have declined by 97%) for 424 houses with scope for the SANG to support a further 424 houses (developers notes in the application)

We highlight that the application fails to acknowledge

- the presence of irreplaceable habitats forming ancient woodland categories.
- the presence of multiple UK BAP habitats of principle importance supporting an assemblage of UK BAP species of principle importance in the area.
- The direct and indirect impacts on ancient woodland and associated species from inclusion within the SANG
- The relationship between hydrology and ecological features
- The delivery of meaningful Biodiversity Net Gain
- The importance of the site and its functions within the wider ecological network.
- The importance and impact on Lake Wood LWS LGS
- The heritage, a rural park and garden and the ancient landscape

We urge Wealden District Council to refuse this application and uphold local and national policy in order to protect Downlands Farm and Budletts Common and thus ensuring the delivery of the following: -

- To conserve and protect this local wildlife rich habitat
- To conserve and protect the irreplaceable habitats and ancient woodlands
- To conserve and protect the mosaic of UK BAP Priority Habitats which in turn protects a rare assemblage of UK BAP Endangered, Priority Species with county and national significance of species.
- To conserve and protect the pivotal Downlands site which is integral to the wider ecological networks between Woodland Trust Lake Wood, Budletts and Buxted Park SSSI, and the designated ancient woodlands including Butchers Wood, Lake Wood, Downlands Farm Shaw, Thirty Acre Wood (including unrecorded PAWS and AWI) Longwood Gill, Shermanreed Ghyll, Budletts Wood, Paygate Wood, Roundwood and up to Buxted Park SSSI with Woodland Trust Views Wood.
- To conserve and protect the locally designated sites of importance for biodiversity including Shortbridge Stream LWS, Butchers Wood LWS, Lake Wood LGS and LWS
- To conserve and protect the Downlands heritage and ancient landscape and the Budletts well preserved medieval landscape, all identified in the BOA for the emerging local plan as part of the LCA High Weald landscape assessment of significance, within the NCA122/NE508 as part of North Uckfield, Maresfield and Buxted Biodiversity Opportunity Area.
- To conserve and protect the cultural heritage including the rural park and garden of the Streatfeilds estate in Lake Wood
- To conserve and protect the relationship between hydrology and ecological features
- To conserve and protect the LNRS, NNR and the BOA

## Appendix - The application fails to meet the DEFRA policy May 2022 Keepers of Time policy objectives and principles

The extracts below confirm why the Downlands planning application fails to meet the requirements of multiple WDC policies and the framework policies and strategic national/county objectives. The application fails to protect and enhance the existing areas of recorded and unrecorded ancient woodland, it does not protect the UK BAP and nationally important assemblage of species including the hazel dormouse, the application fails to protect and enhance the cultural heritage and it fails to recognise or safeguard the landscape context, to name a few of its shortcomings. Relevant policy extracts and maps include the following: -

### Policy principles and strategic objectives

Our vision for our ancient and native woodlands by 2050 is that ancient and native woodlands, and ancient and veteran trees are:

- appropriately protected
- sustainably managed in a wider landscape context
- providing a wide range of social, environmental and economic benefits to society

We have created a set of policy principles and strategic objectives to guide policy development and delivery across government to achieve this vision.

We will work to embed these principles and strategic objectives across future policy in England to make sure the importance of ancient and native woodlands and ancient and veteran trees is recognised. We have identified a number of actions the Government is taking or will take in the short term to achieve this.

#### 1. Protection of the resource

Our strategic objectives are to:

- **maintain and enhance the existing area of ancient woodland**
- **conserve and enhance the existing resource of ancient and veteran trees**
- **recognise the value of and protect long-established woodland**

Our main priority is to protect ancient woodland, and ancient and veteran trees from the threats listed in this policy document. We must also recognise the value of long-established woodland and consider options to provide greater protection to these habitats from development

To protect the resource of woodlands and trees the Government will:

1.1. undertake a review of the National Planning Policy Framework to make sure it is correctly implemented for ancient woodland and ancient and veteran trees. The Government will also strengthen guidance if needed and consult on stronger wording to better protect ancient woodlands
1.2. require local planning authorities to consult the Secretary of State for Levelling Up, Housing and Communities before granting planning permission for developments affecting ancient woodland
1.3. consult on the protections for long-established woodlands in the planning system, recognising their high ecological and societal value
1.4. create a long-established woodland inventory to cover England and help identify these woodlands to inform future protection
1.5. update the Ancient Woodland Inventory to cover the whole of England. This will include mapping smaller ancient woodland sites of 0.25 hectares and introducing a new category for ancient wood pasture and parkland and infilled ancient wood pasture and parkland

18 of 25

## 4. Protection and recovery of woodland species

Our strategic objective is that **rare, threatened or Priority species associated with ancient and native woodland and ancient and veteran trees should be conserved, enhanced and where appropriate, reintroduced.**

Without these valuable, connected habitats, many of our priority species, such as dormice and pine martens cannot survive.

To protect and recover woodland wildlife the Government is:

4.1. providing guidance on good practice management for priority species and the reintroduction of species

## 8. Protection of cultural heritage

Our strategic objective is to **protect, conserve and enhance the cultural heritage of ancient woodlands and ancient and veteran trees.**

The age of England's ancient woodlands and ancient and veteran trees means they are rich in cultural heritage and hold an important record of historic management practices. They often include valuable historic features which cannot be recreated due to the extensive timescales associated and we must therefore protect them.

To protect cultural heritage the Government will:

8.1. promote good working practices and improve historic data resources to make sure valuable historic features are identified, protected and conserved
8.2. encourage, where possible, the restoration of traditional management practices, such as coppicing and pollarding to conserve, restore and enhance landscape character

## 9. Safeguarding landscape context

Our strategic objective is to **recognise, protect and enhance the value of ancient woodland and ancient and veteran trees in our landscape.**

Ancient woodland and ancient and veteran trees have been a feature of our landscapes for centuries. They provide an important sense of place and local distinctiveness to landscape character which we must protect. Where activity such as intensive agriculture and development takes place near these habitats, we should consider adequate buffer zones to protect the resource from harm.

To safeguard the landscape the Government will:

9.1. make sure the management and creation of ancient and native woodland conserves and enhances the local distinctiveness and landscape character
9.2. avoid and minimise the effects of intensive land uses such as agriculture and development that are in close proximity to or adjoin ancient or native woodland

Appendix - Map LWS LGS LNR - The proposed roundabout fails to protect Local Wildlife Sites and Local Geological Site




*red circle approximate location of proposed roundabout next to Butchers Wood LWS, Lake Wood LWS LGS, EU Designated WFD Shortbridge Stream river. The grey shows the continuous woodland corridors supporting these LWS, LGS and ancient woodlands*

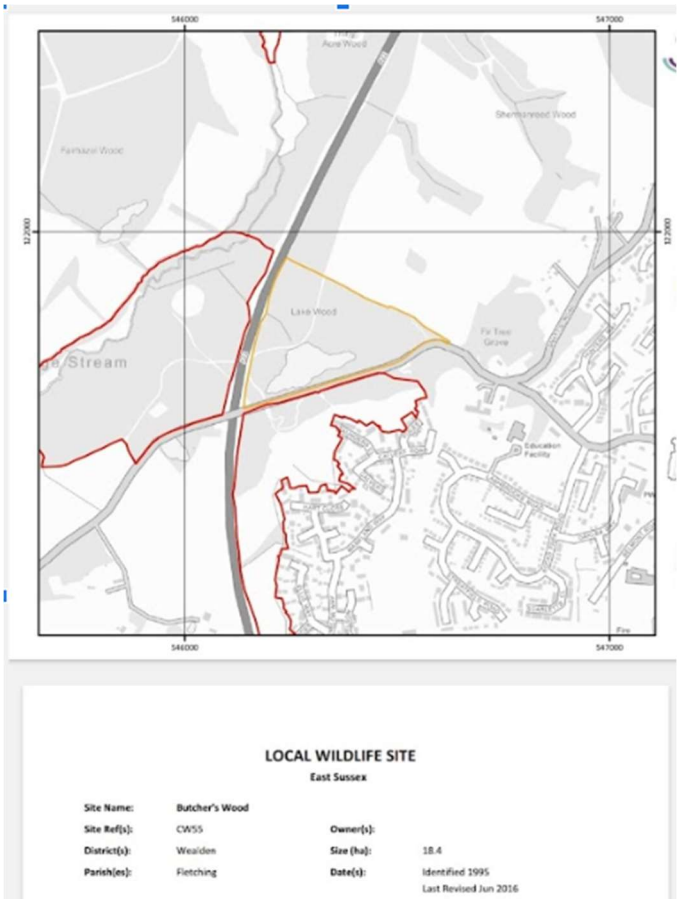



*Image above shows Butchers Wood LWS, Lake Wood LWS and LGS, West Park LNR and the tip of Shortbridge Stream LWS*

## Appendix - May 2022 Wealden Landscape Character Assessment

The developers failed to meet the recommendations of the Wealden May 2022 Landscape Character Assessments.

Whilst overlooking the well preserved ancient medieval landscape and common of Maresfield, Downlands Farm is also an ancient landscape itself, as is Lake Wood from the Mesolithic era and the Malling Common of Budletts Common is a well-preserved medieval landscape and sandstone rock outcrops puncture the landscape, records have rightly placed this area in the High Weald Landscape Assessment and Ouse Catchment. The recent Landscape Assessment for Wealden informing the emerging local plan has again placed this area of High Weald landscape within the Biodiversity Opportunity Area.

Landscape Character Assessment for Wealden District North Uckfield, Upper Ouse Valley
6D High Weald: Ouse Catchment

Lake Wood, Downlands Farm, Budletts Common are in the Biodiversity Opportunity Area and the link to Buxted Park SSSI and Woodland Trust Views Wood (a Saxon Woodland with remnants of a 1st century Roman Corn Kiln) wildlife corridor is important to recognise the wider impact and the conserve and protect context.

The impact of urban fringe development spilling out from Uckfield on this ancient existing landscape should be avoided to preserve the rural character of the LCA.

The Sussex Historic Landscape Character Assessment shows a varied pattern indicative of a typical medieval landscape. Assarts (created by clearance of woodland), indicating a more wooded landscape in the past. Regular or semi-regular piecemeal enclosure is seen in fields. There are also large, designed parklands at Sheffield Park, Buxted Park and Framfield Place and Lake Wood should be part of this designed parklands protected area.

Perceptual character - The LCA is largely a rural landscape, with areas of enclosure formed by the woodland, hedgerows, and mature trees. There are areas of relative remoteness, tranquillity, and an experience of dark skies in the valleys and larger woods - this applies to Lake Wood through to Budletts.

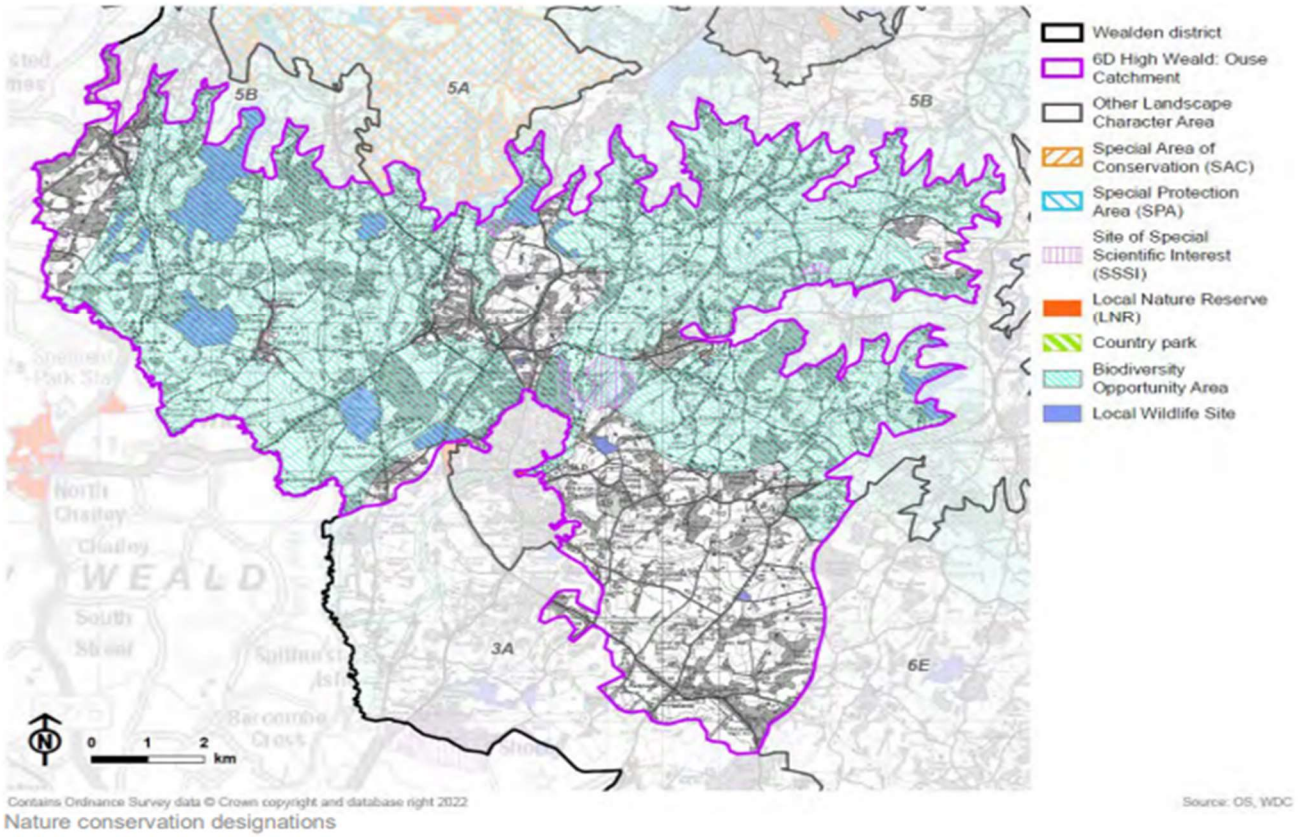
Downlands Farm holds dramatic long views to the wooded Central High Weald including the Ashdown Forest SSSI SAC SPA AONB Common. The 6d High Weald Ouse Catchment area includes Lake Wood and Downlands Farm and the Biodiversity Opportunity Area shown on the map below clearly demonstrates the importance of Downlands Farm maintaining the BOA links between Budletts and Woodland Trust Views Wood.

Downlands Farm is pivotal in the functional connectivity within the Biodiversity Opportunity Area and the 6D High Weald Ouse Catchment :-

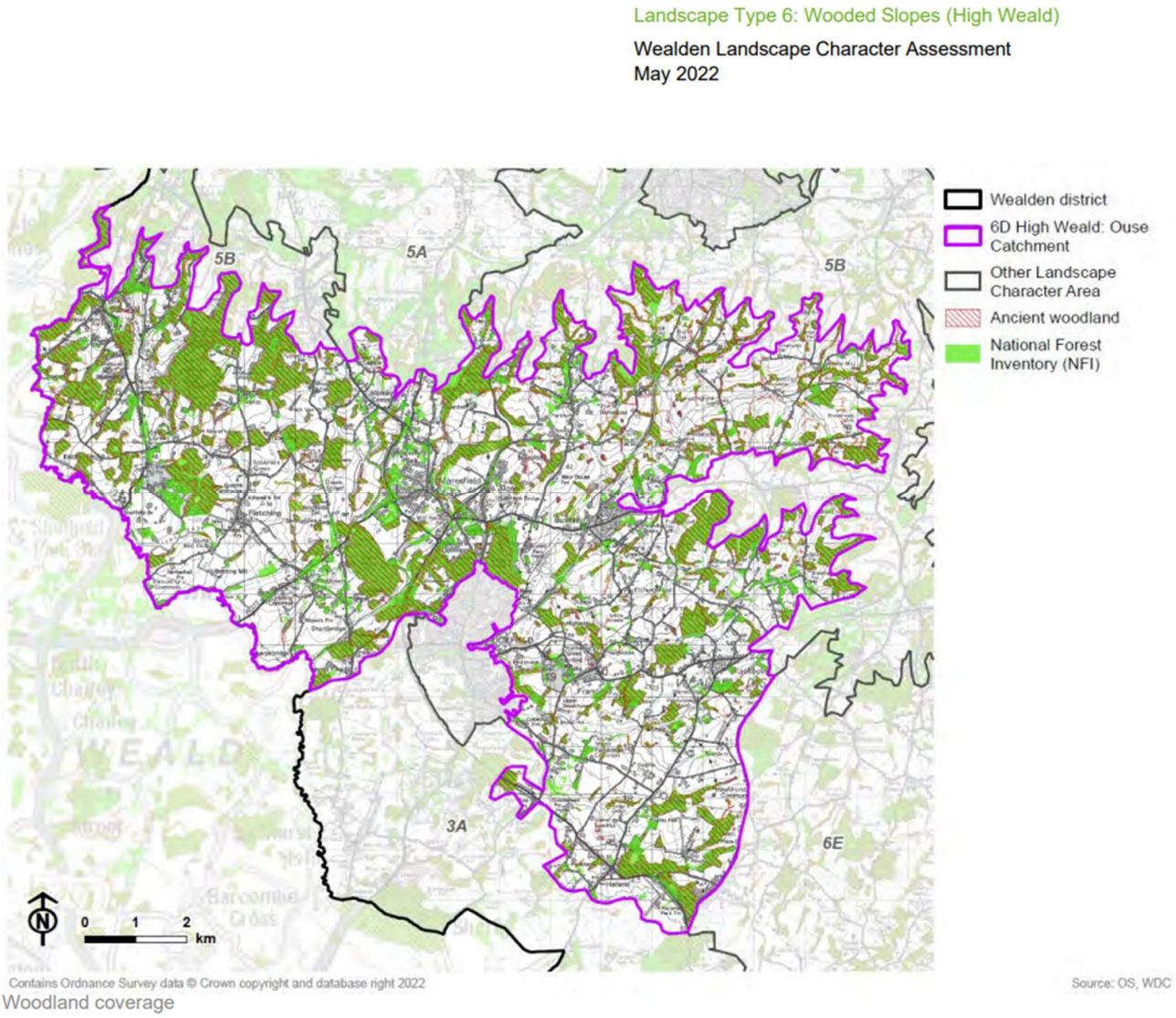
Without Downlands Farm remaining as the fields and hay meadows, the Biodiversity Opportunity Area is fragmented and compromised.

Landscape Type 6: Wooded Slopes (High Weald)

Wealden Landscape Character Assessment
May 2022



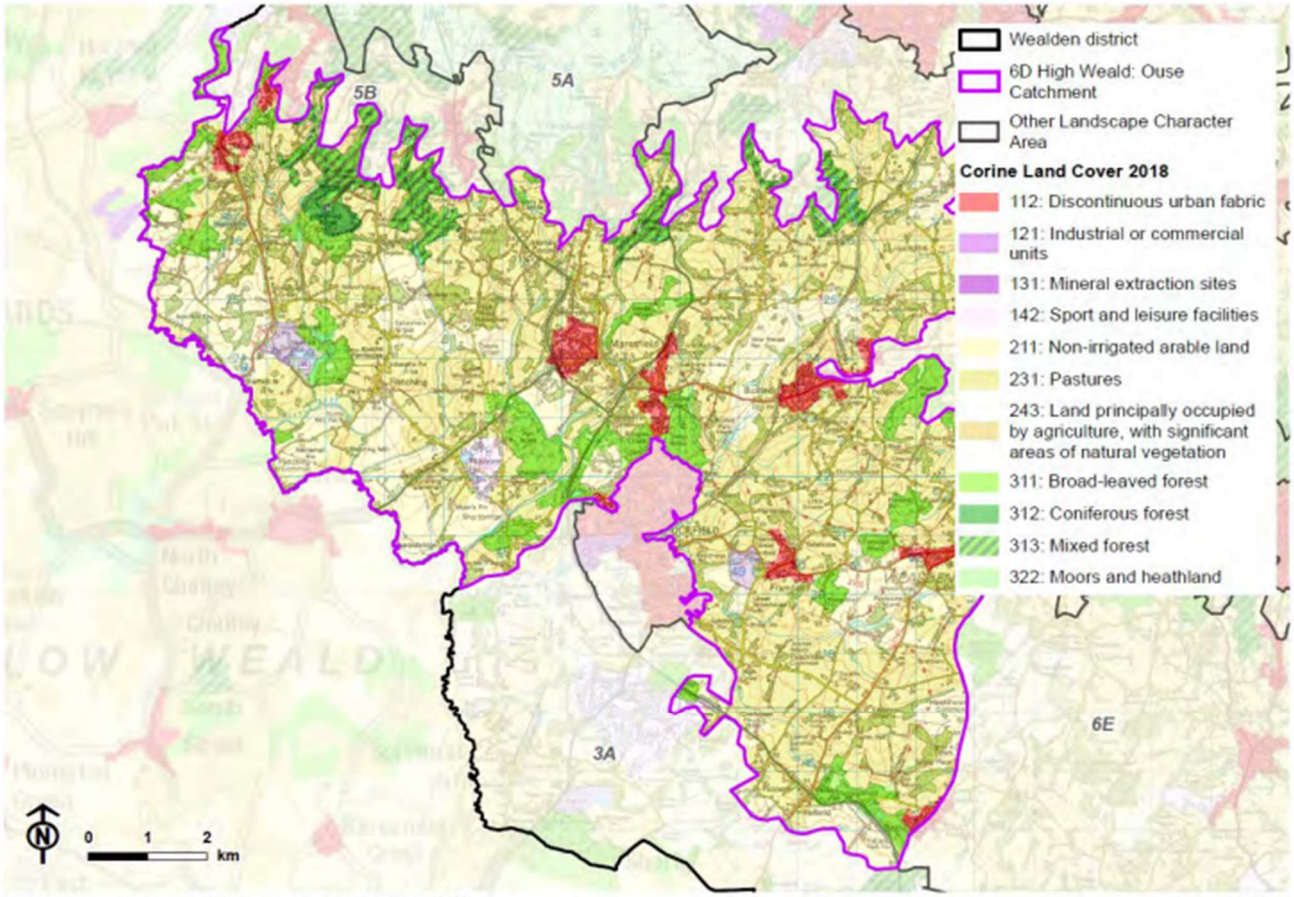

Nature conservation designations




This map shows the functional connectivity for the National Forest Inventory NFI including Downlands Farm hay meadows and the woodlands including the Thirty Acre Woodlands on the A22.

It is clear from this mapping that Downlands Farm is a pivotal part of the BOA ensuring functional connectivity for biodiversity, supporting UK BAP Habitats and Species of principle importance.

The unrecorded ancient woodland, wood pasture and parkland habitats and unrecorded UK BAP habitats are of material concern.



Landcover types (CORINE Land cover inventory 2018)

The above images show the woodlands of Downlands Farm and how they connect the landscape between designated Lake Wood, Budletts and Buxted SSSI and keep the corridors from Woodland Trust Lake Wood LWS LGS to the medieval landscapes of Budletts and Buxted, to the Saxon Woodland of Woodland Trust Views Wood, protecting an essential BOA area. Of note is that the Mockbeggars Farm is also part of this BOA and part of this connectivity.

The following policies within the Landscape Character Assessment, informing the emerging local plan, means that the site of Downlands Farm remains unsuitable for development as per the WDC SHELAA, including: -

- Safeguard ancient woodland and protect and enhance vulnerable woodland habitats and soils including gill woodlands and wet woodlands for the benefit of biodiversity.

- Protect and manage the existing hedgerow network, and plan for the restoration of, and linkages between, hedgerows, including establishing hedgerow oaks, to maintain habitat corridors and to retain the medieval field pattern typical of the High Weald. Remove post and wire fencing where appropriate.

- Monitor water quality in the rivers and streams. Minimise water pollution from agriculture through sensitive land management practices, including regenerative agricultural systems such as no or minimal till, holistic grazing, reduction or removal of chemical inputs, cover crops and restoration of buffer strips along watercourses and field ponds, to minimise run off in order to maintain the biodiversity of wetland habitats.

- Encourage active and appropriate management of woodland to ensure a diverse species and age structure by thinning, coppicing and replanting as necessary in line with the aims of the Western Ouse Streams and Ashdown Forest and the River Uck and its Headwaters Biodiversity Opportunity Areas. Avoid damage from large machinery. No management is recommended for gill woodlands as these habitats are too sensitive and insufficiently understood.

- Protect the remaining historic features related to the Wealden iron industry, such as hammer ponds. Increase interpretation and access where appropriate to raise awareness and link communities with their local heritage, including opportunities for heritage trails or walks.
- Limit the amount and scale of development in rural areas, protecting the existing low-density settlement pattern of dispersed rural villages, hamlets, and scattered farms, and the separation between these different settlement types.
- Ensure new building reinforces and responds to local character in its scale, layout and design, reflecting the local vernacular in use of materials. Developments should draw on the principles contained within the High Weald AONB design guidance, High Weald AONB 'Guidance on the selection and use of colour in development' and objectives of the High Weald AONB Management Plan.
- Extend woodland around settlements and infrastructure development to filter light pollution and soften the visual impact of further urbanisation.
- Maintain the historic network of routeways, ensuring new roads or 'upgrades' take account of their rural context and avoid over-engineered features and/or the introduction of lighting into dark areas. Maintain the trees and species-rich grasslands on road verges.
- Ensure any renewable energy generation is compatible with the guidance above and is in scale with the landscape where possible. Where larger scale renewable energy development is justified to meet climate change objectives, any harm to the landscape should be compensated for by landscape-scale enhancements of the surrounding landscape. Electricity infrastructure associated with renewable energy generation should be efficiently planned to minimise the number of lines required, routeing in accordance with the Holford Rules[2].
- Restore and plant new hedgerows to create habitat connectivity and reduce the visual impact of the transmission lines which cross this LCA, in line with the Beautiful Boundaries project with the National Grid's Landscape Enhancement Initiative.
- Protect long views to the wooded Central High Weald to the north and east and to the distinctive ridge of the South Downs to the south.
- Maintain the strong scenic qualities of the landscape and its sense of remoteness, tranquillity and experience of dark skies.

## Appendix - Map 1899

This map was included in the developers' proposals and helps clarify the scale of the ancient woodland area. The ancient woodland soils of Downlands Farm are of immense importance for an irreplaceable habitat where risk of harm must be avoided. To contemplate harming this considerable ancient woodland site area which must be protected from development and is of material concern. Woodlands of the 1800s have increased protection in the DEFRA policy Keepers of Our Time, we also refer to the research and Woodland Trust planner's manual where the recommendation is for 50m and 100m within local plan policies.






**Image EDP 4.2**: Extract of Second Edition Ordnance Survey Map, 1899.

## Appendix - May 2022 DEFRA Keepers of Time - woodland definitions

From these definitions all the Downlands Farm site should be protected from development.

### Ancient woodlands, ancient wood pastures and parkland, ancient and veteran trees

Ancient woodlands, ancient wood pastures and parkland and ancient and veteran trees are irreplaceable habitats which must be protected. Their long-standing presence, species and form serve as a rich cultural record of past management practices. Ancient and veteran trees are rich in biodiversity. They provide food, shelter, and breeding sites to large numbers of species including birds, bats, fungi, and insects, which are often restricted in their distribution. They can be found both inside and outside of woodlands.

### Ancient semi natural woodland and ancient wood pasture and parkland

Many species of wildlife found in ancient semi natural woodland are also poor at colonising recent woodland. These species only survive due to the long continuity of woodland cover and undisturbed soil profiles. Ancient woodlands are also a rich source of genetic diversity, providing a natural seed bank of native species. Many of our best old growth habitats are found in ancient wood pasture and parkland. These represent some of the best ecological continuity in any woodland type as well as being important cultural and landscape features. Although ancient woodland in England makes up only 28% of all woodland, it holds 38%[6] of all woodland carbon stored in living trees and must not be lost. In addition to the trees, woodland soils are also an important store of carbon. Woodlands will accumulate carbon for hundreds of years and this will continue throughout the lifetime of the trees.

### Plantations on ancient woodland sites and infilled ancient wood pasture and parkland

Restoring ancient woodlands that are ecologically degraded is a high priority for the Government. This includes restoring plantations on ancient woodland sites by gradually transforming stands from non-native planted species to native species. Infilled ancient wood pasture and parkland could also be restored by removing the trees that have grown up and infilled the gaps between the veteran and ancient trees. Restoration will only be considered by the Forestry Commission where there is historical evidence of ancient wood pasture and parkland being present in the past. This could be open grown ancient and veteran trees and where there will be clear net ecological benefit in restoring infilled ancient wood pasture and parkland.

### Long established woodland

Long established woodland has been present since at least 1893. While not ancient, these woodlands are still very important. They have had many decades to develop rich biodiversity and they often contain important old-growth features and deliver a range of ecosystem services

(The map of 1899 evidence the ancient and old woodland further, Downland's Farm ancient woodland has further records from the 1600s,the 1899 map can be compared to MAGIC maps as further evidence of the missing wood pasture, parkland and PAWS records on the national inventory)