APPENDIX 9:

Public representations of Dr Martin Stenning (‘DMS22’ dated 12 August 2022 and ‘DMS23’ dated 20 January 2023)

Dr Martyn J. Stenning M.Phil. D.Phil. MRSB. CSci.

54 Selby Rise
Uckfield
East Sussex
TN22 5EE

Mrs C. Turner

Case Officer

Development and Building Control Wealden District Council (WDC)
Council Offices
Vicarage Lane

Hailsham East Sussex BN27 2AX

App Ref: WD/2022/1637/MEA - Land at Downlands Farm, Nr TN22 2AR

Proposal: Hybrid planning application comprising: outline application (with all matters reserved except for access) for the erection of up to 424 no. residential dwellings including affordable housing, the provision of vehicular, pedestrian and cycle access and separate emergency access from the Uckfield bypass (A22), pedestrian and cycle access from Snatts road, open spaces including children's play space, sustainable urban drainage systems, associated landscaping, infrastructure and earthworks; and full application comprising creation of a strategic sang, associated landscaping and car parking, and demolition of existing residential property and other buildings and provision of pedestrian and cycle access from rocks road, associated landscaping, infrastructure and earthworks. Site: WD/2022/1637/MEA: - Land at Downlands Farm, Uckfield.

Dear Mrs Turner,

As a regular Consultee of WDC, a Chartered Scientist and a professional Ecologist with some 40 years training in life sciences at the Brighton College of Technology and the University of Sussex I would like to comment in detail on the inappropriateness of the above planning proposal. This is because without the detailed knowledge of the consequences of an action such as is being proposed, it is possible that serious mistakes can be made. My focus will be on the environmental damage and loss of biodiversity that such a proposal would cause. There are also technical issues associated with the plan, such as the site being outside any development boundary that I am aware of, and the impact on the residents of Snatts Road and adjacent dwellings and Budletts Common, the A22/26 and other infrastructure that also concern me, but others with greater knowledge of these issues will comment on them to you I am sure. I would also like to let it be known that I am not an "Adjoining/Neighbour". I do have an address in in Uckfield, but in the south of the town in Uckfield New Town. I have not commented on any aspect of another development at Ridgewood Farm in Uckfield South where, if houses are required, the proposed numbers there would be more than sufficient, and the location could be more appropriate to the local needs for housing, as long as environmental factors are given appropriate consideration, in my professional opinion.

I have been in contact with Mr Stacey Robins on the issue of Downlands Farm in recent years as I have a deep concern for the habitats, environment and the wildlife that currently occupy this unique landscape. At the outset, I would like to comment that it was particularly cynical of the proposers to submit their application at the beginning of the 2022 holiday season, knowing that many of the interested parties opposing this proposal are likely to be away on holiday. I believe that this is a deliberate tactic to minimise what I consider would otherwise have been a considerably larger public response to this consultation.

I was an active participant in the public enquiry that concluded in 2009:

PLANNING INSPECTORATE REF: APP/C1435/A/07/2046982/NWF
PLANNING APPLICATION WD/2006/2855/MEA
DOWNLANDS FARM UCKFIELD

The summarised conclusion of the previous public enquiry was that the Planning Inspector stated verbally that Downlands Farm should never be built on, especially for reasons of landscape quality. I respectfully urge you to read the inspectors report, as it is as relevant today as it was in 2009 when it was signed off by the Secretary of State for Communities and Local Government. There were some particularly excellent points made to that inquiry from the CPRE The Countryside Charity, Sussex Wildlife Trust (SWT), Woodland Trust (WT) and Professor Trevor Beebee on behalf of the British Herpetological Society (BHS) and the Herpetological Conservation Trust (HCT).

My situation is that I have been engaged in scientific research for the University of Sussex at Lake Wood (immediately adjacent to Downlands Farm) since 1987 when I embarked on my D.Phil. research there with the kind permission of Commander Norman Scarlett-Streatfeild, the then owner. Lake Wood was later passed into the ownership of the Woodland Trust, who were a major consultee at the last public enquiry. Because of its high biodiversity and ancient character, Lake Wood has been used for many scientific ecology projects based at several British Higher Education institutions including University of Sussex, Bournemouth University, and Plumpton College. Data collected at Lake Wood has been published in the international scientific press that has contributed to our knowledge of the onset and environmental consequences of climate change (references can be supplied on request). I am co-author on many of these publications. I also wrote and had published a book about my research, much of which was conducted in Lake Wood. The book title is 'The Blue Tit' and it is published by Poyser & Poyser which is an imprint of Bloomsbury Publishing. My overriding concern is that Downlands Farm, which is contiguous with Lake Wood, and is part of the same ecological complex of hills and ghylls, contains habitats of similar character and quality. It is inevitable that the building of hundreds of houses, roads and other engineering projects and infrastructure would have disastrous impact on those habitats and the myriad of species living there, including those in Lake Wood. I will enlarge on these points.

I realise that the details of the current application are different to those of the one submitted in 2006, and fewer houses are proposed at this time. However, even 424 houses plus infrastructure occupants and their pets would have severe detrimental effects on the existing habitats and the populations of life forms currently occupying them. It is highly likely that once part of the land at Downlands Farm is occupied by housing, it will only be a matter of time before further building is proposed there. As a Chartered Scientific Ecologist, I know and understand that it is impossible that the use of Downlands farm as

a site for human habitation could ever result in any form of meaningful biodiversity gain, which seems to be implied by the proposal. Indeed, the use of the site by rarer and more sensitive species recorded there such as curlew, turtle dove and woodcock would cease. Each species has specific habitat requirements, and the scarcer ones and the majority of others would be displaced by the building of even a few houses at Downlands Farm. Dormice and bats would be hunted and killed by domestic cats and public pressure on ancient woodland, rocks and wetland habitats would render their value to wildlife unsustainable. It is naive to believe that they could simply move or be moved elsewhere as suitable sites are becoming fewer and further between, as good sites such as Downlands Farm become increasingly unavailable to them. Moreover, populations of animals in potential receptor sites would already be regulated by natural processes and translocation would lead to conflict and density dependent mortality.

My scientific training as an Ecologist has allowed me to realise that the landscape and ecology of Downlands Farm is exceptional. This was concurred independently by Professor Trevor Beebee during the last public enquiry. Professor Beebee is a leading British expert on reptiles and amphibians, and concluded that Downlands Farm is "an astonishingly good site" and qualifies to be designated as an SSSI using herpetological data collected from there. I have personally recorded 73 species of birds, 23 species of mammals and 132 Lepidoptera species, at the site. There are also other key ecological, archaeological, and geological factors that have been discovered there by me and others. One key factor is hydrology, as the ghyll valleys of Downlands Farm and Lake Wood drain into the Shortbridge Stream which is an EU designated Salmonid and Cyprinid waterway, meaning that migratory trout and members of the carp family use the watercourse to breed in. The Shortbridge Stream and the lake at Lake Wood also supports migratory European eels (*Anguilla anguilla)* that swim from the Sargasso Sea to such places to grow for many years before returning to their origin to breed. The *Sphagnum* peat fed lake at Lake Wood, which also supports a huge biodiversity of aquatic plants, invertebrates and vertebrates, including great crested newts, is also fed with water from Downlands Farm and would be jeopardised by the drainage engineering proposed by the developers.

The existing environmental quality of Downlands Farm was recognised by the previous public enquiry, and nothing has changed there since 2009. The fields have been leased out to a local organic farmer who has used them for harvesting silage and hay for animal fodder. The fields have been described as 'low quality agricultural land' but are actually high quality biodiversity habitats. It is an ecological principle that low fertility grassland leads to high biodiversity at many taxonomic levels. The South Downs chalk grassland is a prime example of that and is often referred to in ecological publications. Downlands Farm was once part of a large estate owned by the Streatfeild family and the fields were part of a dairy farm and used to graze cattle there. The habitats, many of which are primeval in character, would be irreversibly and profoundly damaged by <u>any</u> development. The proposed development would change the landscape irrevocably. Downlands Farm is a historic rural downland landscape described as being of High Weald character, punctuated by ancient woodland and prehistoric ghyll valleys formed during many planetary ice ages. These valleys support a rare and biodiverse assemblage of native British species that have evolved there since the Younger Drias ice age that ended 10,000 years ago. If permitted by WDC, these Sussex downlands would become a busy housing estate hostile to wildlife and would smother the timeless history and ecology of the site. My species list, compiled over 35 years, can be supplied on request. I also include the letter written by Prof. Beebee as an appendix. Additionally, I include a

description of the Lake Wood ecology described in c. 1820 by Dr Gideon Mantell, the famous local first discoverer of the previous existence of Dinosaurs.

There is a crescent of countryside habitats around the northern semicircle of Uckfield which is of particularly high quality for biodiversity. This has been demonstrated by the number of designations that can be found there, including Buxted Park SSSI, Uckfield Cemetery LWS, Lake Wood LWS and LGS, West Park LNR LWS, I would also include Hempstead Meadows LNR which is also north of the River Uck and part of the Uck flood plain extending through Buxted Park. Please may I also draw your attention to the fact that this crescent of land is also included within the WDC Biodiversity Opportunity Areas. As such, it represents an area that is already biodiverse presenting an opportunity for WDC to protect this biodiversity for perpetuity. These sites are highly valued by the people of Uckfield and essential to the wildlife that lives there. It may be that this area was not included within the HWAONB at the time of designation in 1983 because little was known about its environmental quality at that time, and there may have been arguments from developers that wanted to allow space for Uckfield to grow in that direction, but this is only speculation as I am mystified as to why land north of the river Uck was not protected at that time. I would also add that I have been part of the Uckfield Neighbourhood Plan Steering Group since 2014, and this plan has been the subject of a great deal of work by a large number of people and is nearing completion, please contact the Town Clerk for details. Downlands Farm was identified as a key green space for preservation, endorsed by every consultation exercise held during the process of compilation.

May I respectfully suggest that Wealden District Council protects the site with a charter that prevents development there for perpetuity as implied by the result of the public enquiry concluded in 2009. This will reduce the commercial value of the site such that it can be purchased by WDC or a suitable benefactor or charity who will support an application for Downlands Farm and its satellite habitats to be designated a Site of Special Scientific Interest. The use of the land can then be regulated and managed in order to protect, maintain and even increase its biodiversity in line with its WDC designation as a Biodiversity Opportunity Area. This will also serve the residents of Uckfield and the rest of Wealden District as a resource for education and recreation.

Until recently, there was a 7 km Ashdown Forest shadow area that gave some protection for the north of Uckfield. I gather that this has now been abandoned. However, the habitats still exist unchanged and the reasons for that protection have not gone away. We now have a huge amount of information about the habitats and history of Downlands farm going back some 150 million years to the formation of the Lower Cretaceous sand rocks that lie beneath its surface. The pushing up of those rocks some 60 million years ago to form the High Weald and then the ice ages that carved out the ghyll valleys feeding the biodiverse streams and tributaries of the River Ouse. We know about the gradual colonization of England after the last ice age 10,000 years ago by pioneer herbs, trees, birds, mammals, reptiles, amphibians, freshwater fish, and invertebrates. All these are still there and thriving (please see my species list). If we chose to make Downlands Farm into another modern human colony it will add to the destruction we are seeing globally with the extinction of some 200 – 2000 species every year, largely due to habitat degradation and other anthropogenic influences.

In Downlands Farm, Lake Wood, Budletts Common and the other habitats of North Uckfield we have a reservoir of life that can only mitigate the destruction that is

happening elsewhere. Despite the developers claims, no additional planting or environmental engineering can replace a habitat that has persisted for so long unchanging and allowing local genotype adaptations to occur in species that cannot be captured and relocated as the relocation zones will have their own better adapted individuals that will out-compete them. This is a fundamental population ecology principle.

The developers proposal would violate a beautiful living landscape that was enjoyed during the lifetime of the owner, Mr Preston who then, it appears to me, exposed Downlands Farm to other ruthless economic opportunists after his death.

The developers have even purchased the beautiful historic Chicory Cottage, the last home of the Streatfeild family, with a view to demolishing it and running a strategic cycle route through its grounds which include ancient woodland and sand rock outcrops.

It is necessary for the planning process at WDC to be strong, just and decisive in preventing a process that is both unpopular with the people Uckfield and Maresfield and a wider body of organisations, and also destructive to the ancient and historic living landscape we know as the Weald of Sussex.

I would respectfully ask you Mrs Turner, Mr Robins and your colleagues to please realise that Downlands Farm is an exceptional case. The issue has developed from a deceased property speculator with no apparent training in ecology writing a 'Last Will and Testament' decreeing that the land must not be sold without planning permission for several hundred houses. This was left with his executors who are accountants who have tried repeatedly to expedite this wish and failed. I would argue that so many reasons have been voiced over the many years since Mr Preston died as to why this wish should not be granted. Also, an expensive long and detailed forensic public inquiry determined that such a development should never happen just 13 years ago. Since then, the only thing that has changed is the strategy of the developers. The habitats are as healthy and thriving now as they were then, perhaps more so due to the continued lack of disturbance rightly secured by Wealden District Council and people and organisations such as CPRE, WT and SWT supporting the Council's virtuous actions.

I respectfully ask you and your team to do all you can to avert what can only be described as a potential environmental disaster at all levels. Namely, I urge Wealden District Council to refuse both the outline and full applications for this development proposal from Gleeson Land and John Alison Land & Research Ltd.

With kind regards,

Dr Martyn Stenning M.Phil. D.Phil. MRSB CSci.

Appendix
Trevor Beebee's letter
Gideon Mantell's description

University of Sussex

Mr G Findlay,
The Planning Inspectorate,
4/04 Kite Wing,
Temple Quay House,
2 The Square,
Temple Quay
BRISTOL BS1 6PN

18.12.07

Dear Mr Findlay,

PLANNING INSPECTORATE REF: APP/C1435/A/07/2046982/NWF
PLANNING APPLICATION WD/2006/2855/MEA, DOWNLANDS FARM UCKFIELD

I wish to register an objection to the proposed housing development (as above) at Downlands, near Uckfield. The basis of my objection is the irreversible damage that the development will cause to a site of outstanding importance to amphibians and reptiles, a group of species widely recognised as being of great risk in Britain today. Survey by the developer's consultants clearly demonstrates that this an astonishingly good site, as summarised in the table below. The data are taken from the document ES6, which includes surveys in 2003 and 2007. Minimum numbers (amphibians) are based on the lowest numbers in the ranges defined by the consultants (e.g. 11 for an "M" rating, which was defined for numbers between 11-100), and therefore will in some cases be underestimates.

Species	**Occurrence at Downlands**	**Abundance at Downlands**	**Abundance "score" (see below)**
Reptiles	No. compartments where present (/9)	Average no. sightings per compartment	
Common lizard	9	6.0	Not relevant to reptiles
Slow-worm	9	8.7	
Grass snake	9	2.5	
Adder	5	0.8	
Amphibians	No. ponds occupied (/6)	Minimum number of animals seen (total across all ponds)	
Common frog	5	55	1
Common toad	3	47	1
Smooth newt	6	46	2
Palmate newt	6	135	3
Great crested newt	6	94	2

This site qualifies for SSSI status under Natural England's criteria specifically for amphibians and reptiles, which require a minimum abundance score of 10. The score is calculated by adding numbers for individual species of amphibians (summing at 9 in the

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table above), and adding 2 points for an assemblage with all five species (as here), thus giving Downlands a score of 11. On top of this, SSSI status is appropriate for "the best reptile locality in a survey area, with at least three reptile species". I have been involved with amphibian and reptile ecology and conservation for more than 35 years, and published many scientific papers (and several books) on the British species, including the *New Naturalist* volume on "Amphibians and Reptiles" in 2000. I know of no better sites for reptiles in the Uckfield area, and Downlands has good numbers of all four species. The combination of all five amphibians and the four reptiles together, each set of which alone would qualify for SSSI status, is remarkable and quite possibly unique in the region.

I should add that the damaging effects of a housing development will not be restricted to the obvious consequences of habitat destruction. Increased predation from pet cats on reptiles, especially common lizards and slow worms, is likely to be intense in the surrounding areas even where these are not physically destroyed (as has been shown on heathlands surrounding Bournemouth). Adders, a species of increasing conservation concern nationally, are very likely to suffer increased persecution by humans so close to an urban development, irrespective of the law that nominally protects them. Great crested newts, a priority species under the EU habitats directive for conservation throughout Europe, are highly vulnerable to the introduction of fish into their breeding ponds. Experience has shown that this is very probable where housing extends close to such ponds. Exactly this problem occurred at Peacehaven in the 1980s, when a pond created near a new housing estate in mitigation for destroying a crested newt site was rendered useless within a few years by the release of pet fish.

All the reptiles found at Downlands, and two species of the amphibians (common toads and great crested newts) are the subjects of UK Biodiversity Action Plans on account of their threatened or declining status. In my view, and the official views of two key organisations involved in amphibian and reptile conservation in Britain (the British Herpetological Society and The Herpetological Conservation Trust), it would be grossly irresponsible to permit the development to go ahead at Downlands. None of the proposed ameliorations are likely to safeguard the amphibians and reptiles there. "Green bridges", for example, are unproven concepts that are essentially evidence-free when considering their value for amphibians and reptiles. Their likely desiccation in summer may well deter amphibians from using them, while shade from dense vegetation (with or without trees) is equally likely to deter use by reptiles. Improved pond management, even if maintained, is unlikely to counter the threat from fish introductions (which only has to happen once). Fences to protect areas from cats are extremely unlikely to work for such an agile and determined predator.

I therefore urge, on behalf of the British Herpetological Society and the Herpetological Conservation Trust as well as myself, that the inquiry rejects the development proposal at Downlands and thus safeguards the future of this important and attractive piece of countryside.

British Herpetological Society

Herpetological Conservation Trust

Yours sincerely,

Prof. Trevor J.C. Beebee

A description of Lake Wood by Dr Gideon Mantell

Near "the Rocks," the seat of ---- Streatfeild, Esquire, about half a mile west of Uckfield, a group of sandstone rocks occurs, under circumstances of considerable beauty and picturesque effect. The path that leads to this interesting spot lies to the right of the road, and by circuitous route, conducts the spectator to the centre of a wood, where a beautiful lake, nearly surrounded by rocks, suddenly opens to the view. The cliffs, overhanging the water, are from twenty to thirty feet high, and are surmounted by forest trees and underwood. In some places the rocks are nearly perpendicular; in others, they descend with a gentle slope to the water's edge, the declivity being covered by a luxuriant vegetation. On the northern margin, a projecting point of high rock is perforated by a natural archway, that has been enlarged by art, and this leads to a recess in the sandstone on a level with the bosom of the lake. From this point the picturesque beauty of the scene is exhibited to particular advantage. On the opposite shore, the base of a rock that juts into the water is in like manner excavated into an arch, beneath which a shallop was moored at the time of my visit. In one of the vertical cliffs, some fine young birch trees had taken root between the thin layers that separate the strata, and in almost every fissure of the rock numerous plants had insinuated themselves, and by the beauty and variety of their foliage, relieved the monotonous and sombre appearance of the smooth grey sandstone. On the less elevated masses, lichens, mosses, and heaths were growing in great profusion and luxuriance. The strata are nearly horizontal, and partake of the characters of those already described.'

A description of Lake Wood from: The Geology of the South-East of England (Mantell 1833 p.203).

Dr Martyn J. Stenning M.Phil. D.Phil. MRSB. CSci.

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App Ref: WD/2022/1637/MEA - Land at Downlands Farm, Nr TN22 2AR

Proposal: Hybrid planning application comprising: outline application (with all matters reserved except for access) for the erection of up to 424 no. residential dwellings including affordable housing, the provision of vehicular, pedestrian and cycle access and separate emergency access from the Uckfield bypass (A22), pedestrian and cycle access from Snatts road, open spaces including children's play space, sustainable urban drainage systems, associated landscaping, infrastructure and earthworks; and full application comprising creation of a strategic sang, associated landscaping and car parking, and demolition of existing residential property and other buildings and provision of pedestrian and cycle access from rocks road, associated landscaping, infrastructure and earthworks. Site: WD/2022/1637/MEA: - Land at Downlands Farm, Uckfield.

Dear Mrs Turner,

Thank you for all the work you are doing to evaluate the merits and demerits of the above proposal. Having read recent representations on the public portal, I feel moved to write to you again in response to the 2 emails from Heather Hall, Heritage Officer, Planning and Environmental Services, Wealden District Council. Also, the response to them by: Environmental Dimension Partnership, Unit 11B, Waterside Court, St Helens, Merseyside, Lancashire, WA9 1AU, who are the global consultants engaged by Gleeson Land (Ancells Business Park, Sentinel House, Harvest Cres, Fleet GU51 2UZ). The latter's intention seems to be to cast doubt on the conclusions and estimations of Heather Hall.

My credentials are that I am one of 5 generations of Stennings to have lived in Uckfield. I have been an Uckfield Town Councillor, and served on several committees including, for many years, the Neighbourhood Plan Steering Group, Chaired by Holly Goring, Town Clerk, Uckfield Town Council. I also served as Chairman of the Uckfield and District Twinning Association for about 10 years. I am also a Chartered Scientist with a Doctorate in Ecology. It may be relevant that I did much of my doctorate research in Lake Wood which is adjacent to the proposed building site. I also knew the Streatfeild family, who originally gave me permission to work there, and I am, therefore familiar with much of the history of Downlands Farm and The Rocks Estate. All my views in the text are mine alone, but the facts are from reliable sources. I know also that I write on behalf of a very large number of residents of Uckfield who have voiced their opposition

to the above proposal, largely due to the landscape quality and biodiversity, but also due to the local cultural heritage included in this very special part of the Weald of Sussex.

I considered that it might be useful for you to have input from someone who has lived in close contact with the structure and history of the site. Also someone who understands, at first hand, exactly why 84 local residents (objecting to the proposal) attended the Uckfield Town Council Plans Committee meeting on 26th September 2022. Many of the attendees spoke eloquently and passionately about the reasons why they have objected to Gleeson's proposals. Those who did not speak clapped enthusiastically after those who did. Also, I write on behalf of (at least) 355 people of Uckfield and district who have taken the trouble to write to WDC because they oppose the proposals of Gleeson. I know there are many more residents who have not made their opposition to the proposals known, and many who have scant knowledge of all the facts.

I would like to start by highlighting the glaring errors apparent in the EDP report indicating a lack of conscientiousness in compiling the text, which is largely a desktop exercise with apparently just one site visit. EDP consistently mis-spell the name of the former Rocks Estate owners who landscaped and protected the estate for more than 200 years. The most recent owner of the estate was Commander Norman J. Scarlett Streatfeild D.S.C.. Please note the name Streatfeild is spelt with ei rather than "ie" as erroneously used in the EDP report. The estate consisted of a huge land holding of which Downlands Farm was a small part. The current house, now regarded as "Buckswood Grange", was built on the site of previous houses by the Streatfeild family in 1838 and was called "Rocks House" and only became "Buckswood Grange" when it became occupied by Buckswood School, which moved to Uckfield from Crawley during the 20th century. The name of the school became the address, and remained so after Buckswood School left the premises and moved to Guestling. More information can be found at:

https://theweald.org/P3.asp?PId=Uc.Rcks

The first known house on the site was called Copwood House which was demolished in 1770 and rebuilt as Rocks House, or sometimes just "The Rocks". This was demolished in 1838 and rebuilt to its current general appearance and form. Please note that the EDP report (section 1.19) claims that the building at this date, 185 years ago, has "…*recently been constructed*". Is 1838 recent? This house remained occupied by the Streatfeilds until 1938, but some of the family remained in Uckfield. There were Streatfeilds (by marriage into the Brocklebank family) still living at Chicory/Rocks Cottage until the late 20th century when they emigrated abroad. Since then, the cottage has had several owners.

Please note that on the above web-site, the dwelling known as Chicory Cottage was called "Rocks Cottage" photographed in 1922. Also, there is an excellent picture of the foot-bridge over the Rocks Road taken in c. 1944. There is much current discussion about the future of Chicory/Rocks Cottage with Gleeson wishing to demolish it and construct an access to Downlands Farm from the Rocks Road and through Fir Tree Grove, which EDP repeatedly (erroneously) refer to as "Fir Grove".

The EDP report is in error when refering to Gormanston (last residence on the estate of Mr Clarence Preston, whose last will it was to develop the site) as Godmanston (section 1.45). The report implies that this "…*reflected the trend of the wider residential expansion of Uckfield to the east of Snatts Road*." I would contend that this is not a trend as this seems to be the only new green field site building that I know of to the west of Snatts Road

which has consistently been the north western perimeter of the development boundary of Uckfield. All development to the east of Snatts Road was within the historic development boundary. As owner occupier of Downlands Farm, it was clearly the wish of Mr Preston to live within the high quality landscape and environment that he owned. His reason for building and naming the house Gormanston was that "Viscount Gormanston is a title in the Peerage of Ireland created in 1478 and held by the head of a branch of the Preston family, which hailed from Lancashire. It is the oldest vicomital title in the British Isles; the holder is Premier Viscount of Ireland." Mr Clarence Preston was declaring his (implied) connection to the noble family by naming his new house Gormanston. However, I understand from the Streatfeild family that there was no known family connection. This is apparently the only building NW of Snatts Road that was not built on the site of a previous building (i.e. brownfield). One wonders how it got permission as it was on a greenfield site outside the Uckfield development boundary and local plan.

The heritage tragedy is that in his last will and testament, Clarence Preston, formally co-director of Barham Estates Ltd, willed that Downlands Farm should not be sold without planning permission for the building of a housing or industrial estate. This decree has been pursued by his executers and accountants ever since. However, this outcome is not the will of hundreds of <u>living</u> occupants of the market town of Uckfield that has always been surrounded by farms since time immemorial. If Downlands Farm were to be built on, this would no longer be the case, marking the first step in merging Uckfield with Maresfield and the eventual conurbation of Uckfield with its surrounding villages. Indeed, in section 1.10, the report states that the land comprises parts of the "parishes of Uckfield and Maresfield". This itself complicates democratic processes. Section 1.12, the map and section 1.13 are useful indicators of how the landscape was in 1829, and how extensive the woodland was at that time. I know for sure that some of those woodlands have been thinned and felled since that time fairly recently while owned by Mr Preston. It would be useful to compare the O/S maps of the intervening time.

In section 1.17, EDP mistakenly refer to what was formerly Downlands House, then Charlwood Manor as "Charlwood House", correctly named in section 1.35. Then in 1.19 EDP refer to Fir Tree Grove as "Fir Grove".

EDP present some useful images of Downlands Farm in winter, illustrating the open grassy downland and frequent areas of woodland that makes up the rich environmental diversity that hosts the exceptional assemblage of wildlife that currently uses it as a refuge and breeding habitat. In the text, the author uses words such as "scrubby woodland" and "ruderal vegetation" that may imply that it is of little value, but it is just these successional stages in forest development that manifest habitat diversity and often hosts the largest range of species.

In 1.54, the author asserts that "it is not expected that the proposals development would diminish the setting of any of the (existing) buildings". Also that "Charlwood Manor would also be unaffected.". How can this be possible if some 424 houses, roads and other infrastructure is to be built within a few tens of metres of your home. A process that may take some years and result in the loss of High Weald quality landscape on your doorstep and outside any development boundary that has existed. How can this statement of EDP possibly be justified?

EDP list the factors convenient to them in the sections 1.60 to 1.90, but fail to mention several items. First, the existence of West Park Local Nature Reserve (WPLNR) which

was part of the Rocks Estate designated as a Local Nature Reserve in about 1996 and is a LWS and LGS similarly with Lake Wood.

In section 1.69 the author mentions only one tunnel beneath the Rocks Road connecting the Rocks House parkland with Lake Wood. However there are 2 tunnels. One is a coach tunnel that carries the coach road from Rocks House through the parkland, under the Rocks Road (this tunnel was bricked up by Mr Charlie Figg during the 1970s) when the Rocks Park (West Park) estate was sold off. However, access is still possible for wildlife though openings at the wall bottom. The coach road runs through Lake Wood and out into Downlands Farm all the way to Budletts Common and eventually to the public road near Maresfield. Although this track is no longer used by vehicles, it is still a track/pathway, there are local people who have used this path for decades and therefore it should be eligible to be a public right of way. The second tunnel is a pedestrian tunnel at the eastern end of Lake Wood with access between Lake Wood and the grounds of Buckswood Grange. The tunnel has bat-friendly metal gates at each end and are kept locked, but access is given to the residents of Buckswood Grange and Woodland Trust staff as required.

Additionally, no mention is given to the historic ice-house in the grounds of Buckswood Grange. Also, the whole complex has been shown to be a Mesolithic site with multiple rock shelters that have been investigated by M. F. Hemmingway during the 1970s and written up by the Sussex Archaeological Society. Many flint tools were found in Lake Wood and what is now WPLNR. The site was confirmed to have been occupied by Mesolithic people. There are outcrops of sandstone also within the proposed building site, but to date I have no knowledge as to whether these have also been investigated.

In 1.70, the author is misleading about the landscaping of Lake Wood. Most of the wood was managed for forestry, and only the relatively small area around the lake was used as amenity. Most of the woodland is ancient semi-natural woodland, part of the woodland is coppice with standards, the rest is mixed, mostly deciduous ancient woodland with several notable self-seeded veteran trees. A species list can be provided on request. Lake Wood is 9.471 hectares and is part of the local mosaic of habitats including WPLNR and the grounds of Buckswood Grange and should not be described as "*an isolated remnant of the wider grounds of The Rocks*". Also the author is in error to say that "*there is no longer any direct connectivity with the former mansion house to the south of Rocks Road*". The mansion house still exists, it has been divided into apartments and the residents frequently use the pedestrian tunnel beneath Rocks Road to visit and enjoy Lake Wood. Also, there are actually 3 access points from Rocks Road into WPLNR, which is contiguous with the grounds of Buckswood Grange, not just one as the author asserts. Indeed, the photograph comprising Figure 29 is taken from WPLNR. This nature reserve has signs at entrances and within, indicating its status, but this is ignored by the author. There is a gate, usually locked, for residents of Buckswood Grange to enter WPLNR through the dividing chain-linked fence.

1.79 asserts that "*there is no experience of the land within the site*." Referring to Lake Wood and Downlands Farm. This is totally untrue as there is a view across Downlands Farm right across to Ashdown Forest from the path at the eastern edge of Lake Wood. Indeed, people photograph Downlands Farm from the wood and also paint pictures. I have one such painting in my possession. This paragraph of the author is misleading.

The authors assert that the development "*is not expected to result in any change to the experience of Lake Wood*". I, however, do expect the development to have profound consequences to the experience of Lake Wood. I have already mentioned the views over Downlands Farm from the path from the eastern entrance, but the whole patchwork of habitats including the ancient woodland of Lake Wood, the ghyll valleys of Lake Wood, Shermanreed Wood and Longwood Ghyll ring with the sound of birdsong in the summer, also the buttercups of the organically farmed fields and the orchids, wood anemones and bluebells of Lake Wood and the woods of Downlands Farm are a continuous living land and soundscape. The total population of the proposed Downlands Farm human colony would probably exceed 1000 people among the c. 424 houses and also their pets. Lake Wood would become an obvious place for dog-owners to exercise their pets and let them defaecate. Domestic cats would roam within the woodland reducing the populations of dormice, yellow-necked mice, bats, lizards and nesting birds. The experience of Lake Wood would become vastly different. I am not convinced that a fence along the southern boundary of the proposal site would persist as a barrier to prevent "*any adverse impacts on its woodland character*", in section 1.88. Therefore section 1.89 becomes redundant.

Figure 32 depicts the wall along the southern boundary of Lake Wood that is believed to be more than 100 years old. The authors assert that this represents a severing of links between the components of the estate. However this very old wall and the fence along the boundary of Buckswood Grange and WPLNR have always been there in some form for over 100 years as this was a public road through a private estate. The 2 tunnels also still exist as preserved features. On the ground, there is a good relationship between the residents of Buckswood Grange and the Woodland Trust and also the Town Council who manage WPLNR. Also the vast number of animals using the various grounds move freely between them. The connectivity is essential to the functioning of the entire ecosystem of the various holdings, including Downlands Farm.

Regarding Chicory Cottage, it is clear that this dwelling has evolved since at least the early 19th century, and is a locally much loved place as part of 'Old Uckfield', and the last dwelling place of the historic Streatfeild family. The grounds consist partly of about a hectare of ancient woodland and is punctuated with lower Cretaceous sandstone outcrops. Many local people believe that Chicory Cottage should be preserved.

In summary, the "heritage addendum" by the author working for EDP and retained by Gleeson Strategic Land Limited serves not to allay fears concerning the consequences of expediting the plans proposed, but on the contrary, those fears have been confirmed and even multiplied by this report. I do appreciate the good work done by Heather Hall.

I respectfully ask you and your team to do all you can to avert what can only be described as a potential environmental disaster at all levels. Namely, I urge Wealden District Council to refuse both the outline and full applications for this development proposal from Gleeson Land and John Alison Land & Research Ltd.

With kind regards,

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