[redacted]

Downlands Farm - WDC Planning Application Ref. WD/2022/1637/MEA

Further to the developer's re-consultation on the Wealden planning application portal we respectfully submit an objection to the new proposals.

The re-consultation updated the application including:

- Emergency access design within ancient woodlands
- The SANGS updates using multiple ancient woodlands
- Access through woodlands and ancient woodlands
- Environmental Surveys

Our objection is based upon the impact on Woodland and Water, Woodland and Heritage, and Woodland Species and Habitat. Please find attached three documents dealing with each issue in detail. In summary:

Woodland and Water

The re-consultation updates records across the woodlands and habitats including updated drawings and masterplans. Of concern is how these updated designs cause impact to the water flowing across the woodlands.

We have therefore provided a visual collection of images from 2022 regarding the woodland and water from the Downlands Farm area to broaden the knowledge of these particular woodlands in relation to the re-consultation. The re-consultation does nothing to avoid the water environment being radically changed in the ancient woodlands, isolated habitats and Lake Wood.

Woodland and Heritage

Subsequent to the re-consultation, we have reviewed the historical evidence of the woodlands and the heritage landscape. We have found evidence that contradicts the SANGS and the amendments. We hope that this evidence will be considered.

Woodland Species and Habitats

Downlands Farm meadows, heath and woodlands are rich in wildlife diversity. The re-consultation does not seem to have any specific mitigation or measures to protect all the species populations.

In addition we have noticed that the re-consultation documents do not reflect the wildlife, ground flora and other species that we see in Downlands Farm and the woodlands throughout the year, and we do not believe that the developer's sporadic surveys can truly capture the diversity of the site.

We have also checked other records for known species that are missing from the re-consultation. We have added local community records, NBN Atlas and pictures of observations from iNaturalist. These include an Annex 1 bird (confirmed by SOS, Chattaway 2023), a woodland bird assemblage, additional bat surveys and identification of the *Myotis sp*. group. In addition, we have recorded more than 25 butterfly species and the Sussex Biodiversity Record Centre has recorded more than 118 bird species. We do not believe for one moment that the re-designs will safeguard all the species while at the same time they are breaking up and isolating their habitats.

We have compared our records with the developers' records and found them incomplete. For example, we have recorded more than 25 butterfly species and in addition Sussex Biodiversity Record Centre has recorded more than 118 bird species. We are concerned about the species of Downlands which are also referenced in the Habitats and Species of Principal Importance. The Habitats and Species of Principal Importance are listed in a government document (https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england).

The developer's Proof of Evidence claimed that the community did not object to the re-consultation. It is wrong to say that few responses mean no objection. The community has already objected vociferously and there are many who do not know how to participate in the inquiry process.