Woodland – Species and Habitats

The re-consultation updated the ecology survey records, masterplans, designs and SANGS. The community maintain the strong objection to the original and amended proposals and ask for the following to be considered where appropriate.

The local community are also observers of these same environs such as the ancient woodland, meadows, the natural environment and record the species and ground flora surrounding Downlands Farm and woodlands.

Therefore, pictures of the habitats and species during the seasons, seem the only prudent way to demonstrate that the habitats tell a different story to that of the updated spreadsheets provided by the developer. The following responds to the re-consultation on behalf of the species and habitats impacted and various pictures and further observations are provided if the inspector is minded to consider the information.

The community have a different point of view to that of the developers in that the proposed development will break this most natural environment. Avoiding harm by providing protection from isolating and fragmenting the woodlands is the only measure suitable at Downlands which should never be built on. Conservation of the habitats for the species and heritage is the only appropriate measure for this Downlands area.

This is a response to the re-consultation and the abundance of species and ground flora at Downlands Farm.

Please note, this reply is not in order of priority and is a means to collate information.

A22 Woodland Ground Flora April and May 2023

1. A22 Compartment SC2 – W8 transition from Lake Wood continuous Woodland to Thirty Acre Wood.

2. The developers have added in their re-consultation ground flora of section W8. Pictures of the same area were taken in April May 2023 and May 2023 and these follow.

3. The following are pictures are of the ground flora from Lake Wood near tree sprayed with reference “P9” through developments compartment SC2 to Thirty Acre Wood compartment W8. These are continuous deciduous and ancient woodlands and plantations, along the side of the A22. W8 includes the location of the proposed new roundabout and access road. Of concern is any access visibility splays impacting more corridors of the woodlands, as well as breaking through the woodlands.

4. The developers seem to advise no woodland will be lost and no irreplaceable habitat will be harmed. The ground flora indicates the old woodland is a site of ancient woodland, ecological continuity as shown the old maps (see Woodlands & Heritage update re-consultation).

5. The pictures following were taken in April 2023 and May 2023 and provide evidence of the ancient woodland ground flora species indicators in abundance through the woodlands linked to Lake Wood and Thirty Acre Wood. This is what the local community has seen for decades driving along the A22 or walking to/from Lake Wood.

6. We confirm these pictures were taken this year, in this location, to support how important the soil and these woodlands connections are to Lake Wood and demonstrate the abundance of

ancient woodland ground flora. We feel it is not possible to divide the woodland into compartments to facilitate road access for a roundabout and road access for the emergency access and cycles as demonstrated by the pictures – these are continuous habitats. Many of the pictures will be self-evident on site based on the trees (standing, fallen, plantation), shapes of branches, deadwood.



7. Lake Wood ground flora looking towards the large fallen tree and tree P9 – 26th April 2023 from the carriage drive. The fallen tree is now on the ground next to the tree marked P9.



8. W8 - A22 Thirty Acre Wood Ground Flora – woodland and plantation. April & May 2023



9. A22 Thirty Acre Wood Ground Flora – woodland and plantation. April & May 2023

10. The abundance of ancient woodland indicator species is shown in the photos and included abundant dogs mercury, dominant wood anemone, frequent goldilocks buttercup in one part of transect w8, wood spurge was frequent in the access road area , bluebell also recorded frequent and the goldilocks buttercup where the access road is proposed. Wood avens was found in W8 not on developers list, as was common figwort, hedge woundwort was seen, some bilberry was also seen in W8.



11. A22 Thirty Acre Wood Ground Flora – woodland and plantation. April & May 2023



12. A22 Thirty Acre Wood Ground Flora – woodland and plantation. April & May 2023

13. Wood Spurge frequent in one section and frequent goldilocks buttercup was seen in the proposed access area of W8



14. A22 Thirty Acre Wood Ground Flora – woodland and plantation. April & May 2023

15. Wood spurge was frequent in the access area for roundabout and road

16. The abundance of ground flora for the roundabout and access area does not appear to be fairly represented in spreadsheets.



17. A22 Thirty Acre Wood Ground Flora – woodland and plantation. April & May 2023



18. A22 Thirty Acre Wood Ground Flora – woodland and plantation. April & May 2023

19. Of concern, the woodland flora from Lake Wood flows through to the adjacent plantation woodland as per some of these pictures. This may have been called Scrub SC2 yet the pictures show plantation woodland, wood anemone, bluebell, dogs mercury, lords and ladies. Is this proposed for re-engineering in the masterplan next to Lake Wood? This is much need plantation

woodland providing connectivity to a major ancient woodland site (Lake Wood) with active hazel dormouse in the plantation woodland / flora supporting Lake Wood for the NDMP and NBMP.



20. A22 Thirty Acre Wood Ground Flora – woodland and plantation. April & May 2023



21. A22 Thirty Acre Wood Ground Flora – woodland and plantation. April & May 2023

22. A frequent abundance of early purple orchid by the bypass in one section of W8, was it recorded on the spreadsheet as frequent?

23. Evidence of fencing dilapidation which occurs throughout these woodlands.



24. A22 Thirty Acre Wood Ground Flora – woodland and plantation. April & May 2023

25. Common Figwort in W8, was it recorded? One of the three plantation woodland with Dominant bluebell, heritage records demonstrate how old this area is.



26. A22 Thirty Acre Wood Ground Flora – woodland and plantation. April & May 2023

Budletts Wood – bluebell and cow-wheat



27. Budletts Wood is a Sussex Bluebell woodlands parts of which are placed in a SANG – of concern is what happens to the connection of Budletts Wood to the SANG re-consultation

28. Budletts Wood ancient woodland and abundant cow-wheat ancient woodland ground flora. The SANGS update appears to place this delicate ecosystem of ancient woodland ground flora being drilled with metal spikes, and a 2m board walk with a volume of visitors never experience and many more dogs running through this habitat can only lead to irreversible harm to irreplaceable habitat in Budletts Wood.



29. Abundant Cow-wheat in part of the Budletts Wood mosaic of irreplaceable habitats

iNaturalist app- 200 Species Observations

30. Species observations in the area have also included using the iNaturalist mobile app. The pictures of observations are from 2022 to 2023 and hold 200 records of observations of the flora and fauna during the seasons, accounting for circa 350 observations and 200 plus species pictures.

31. The pictures of observations have been made between Budletts, Downlands Farm and Thirty Acre Wood, with a few records in Lake Wood up to 2023.

32. The White Admiral butterfly for example was seen in 2023 and recorded in 2022, picture below. The developers may have dismissed this butterfly being in the local area.

33. Of concern is the impact to the normally unseen irreplaceable species and habitat ground flora such as the fungi and mushrooms across Budletts Woods and all the flora and fauna species. Irreplaceable habitat is a thriving natural ecosystem. The proposed impact by recreational pressure, direct and indirect harm and now proposing additional harm to this national environment with a new 2m x 464m man-made boardwalk punching through natural irreplaceable habitats shows how little the new masterplan has really cared about the environment in the pursuit of development.

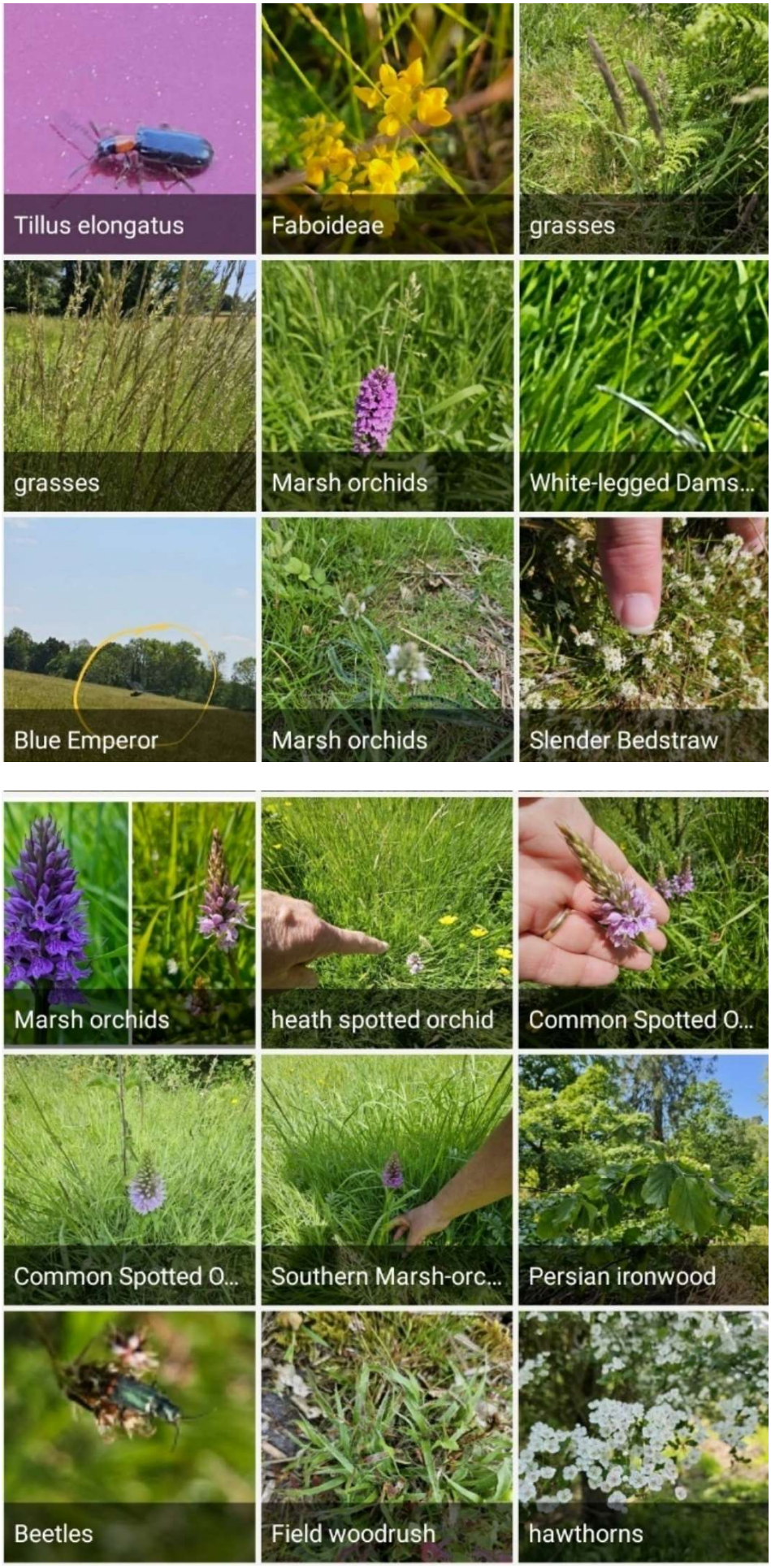
34. Therefore, to help provide an alternative picture to the species in the area, the following pictures are screenshots capturing the local community observations. We confirm these pictures and observations are recording the species from Downlands Farm area, Budletts to Thirty Acre Wood . Some records have recently been added via an iRecord app.

35. We are grateful for the inspectors tolerance as we merely wish to ensure the whole picture regarding the re-consultation is aware of the local community records as well.

36. A picture paints a thousand words, we felt these records may not be accepted unless they could be identified and therefore this seemed the only appropriate method to indicate other species found via the iNaturalist app 2022-2023 and the pictures of observations from the Downlands Farm area, Budletts, Thirty Acre Wood, a few from Lake Wood follow :-

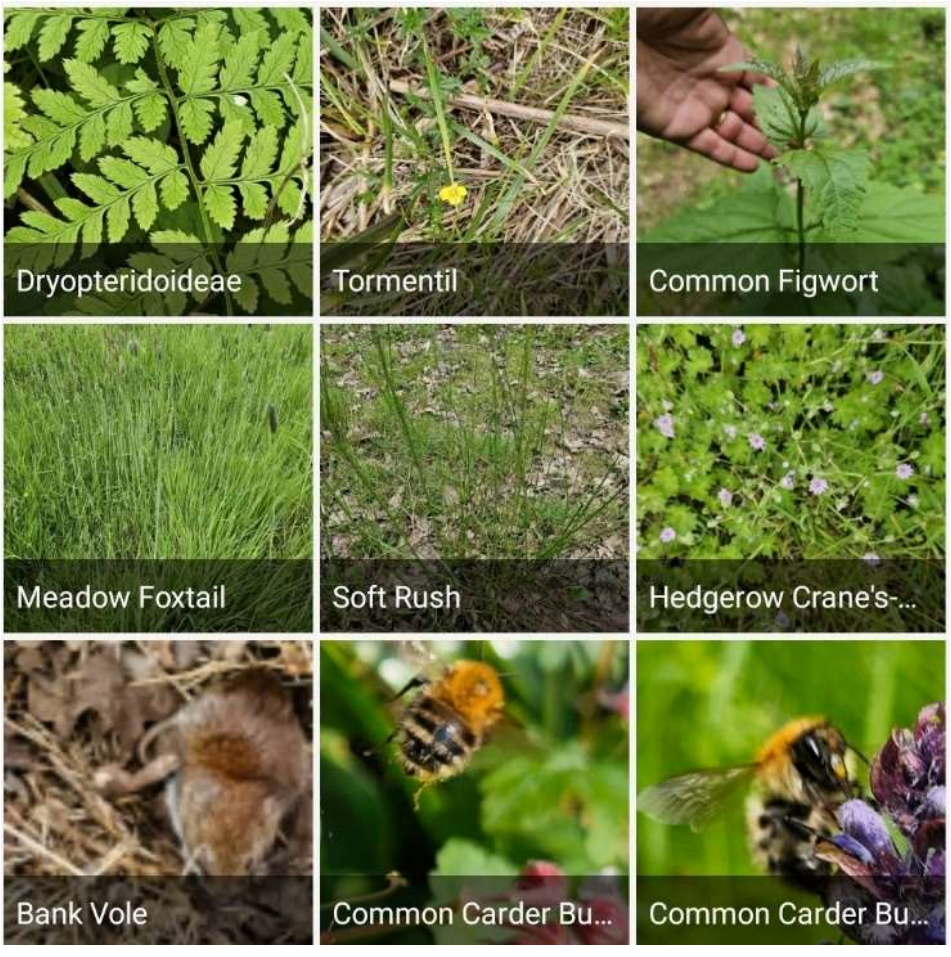

Barn Swallow
Seven-spotted Lady...
Beautiful Demoiselle
"great bulb fly"
Bumble Bees
Broad-bodied Chaser
Amblyteles armator...
Vestal Cuckoo Bum...
Bright Horse Fly


Eurasian White Ad...
Javelin Wasp
Abax parallelepiped...
Common Copperba...
Common Knapweed
Gasteruption
Common Red Soldi...
Common Red Soldi...
"moth"

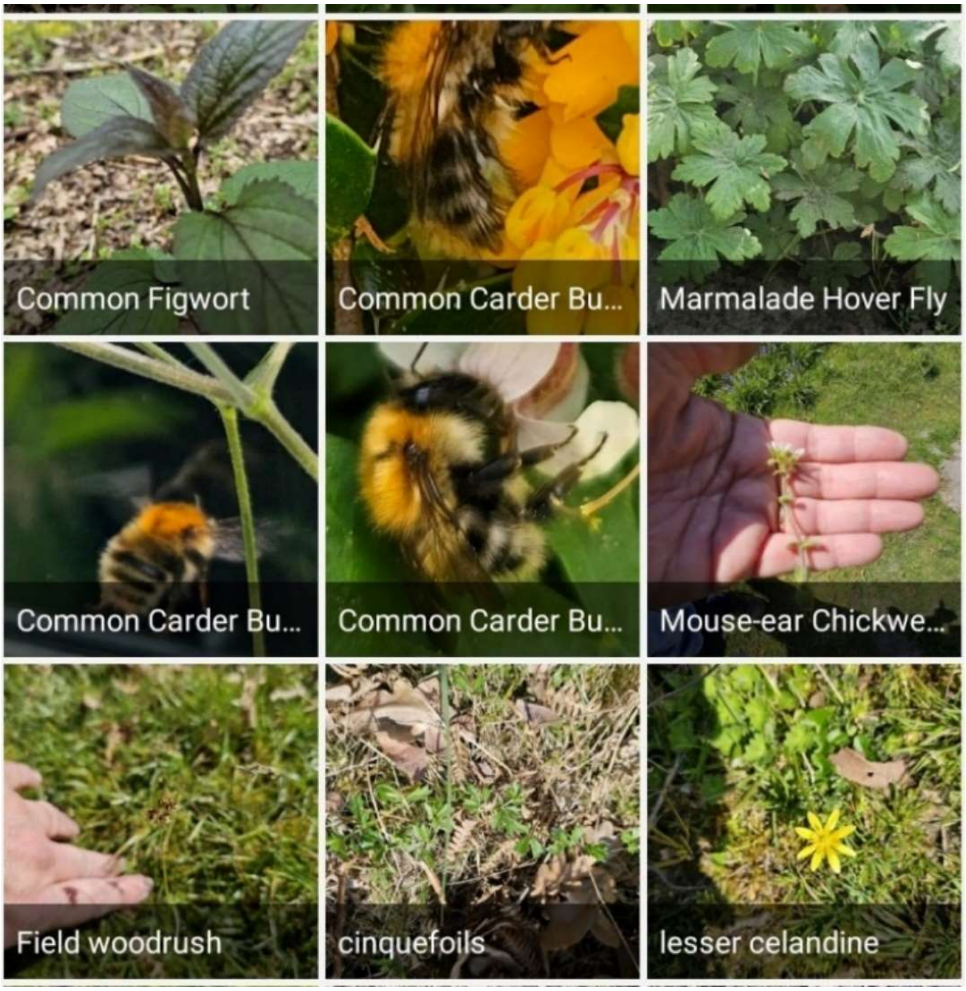


The Persian ironwood is from a different woodland.

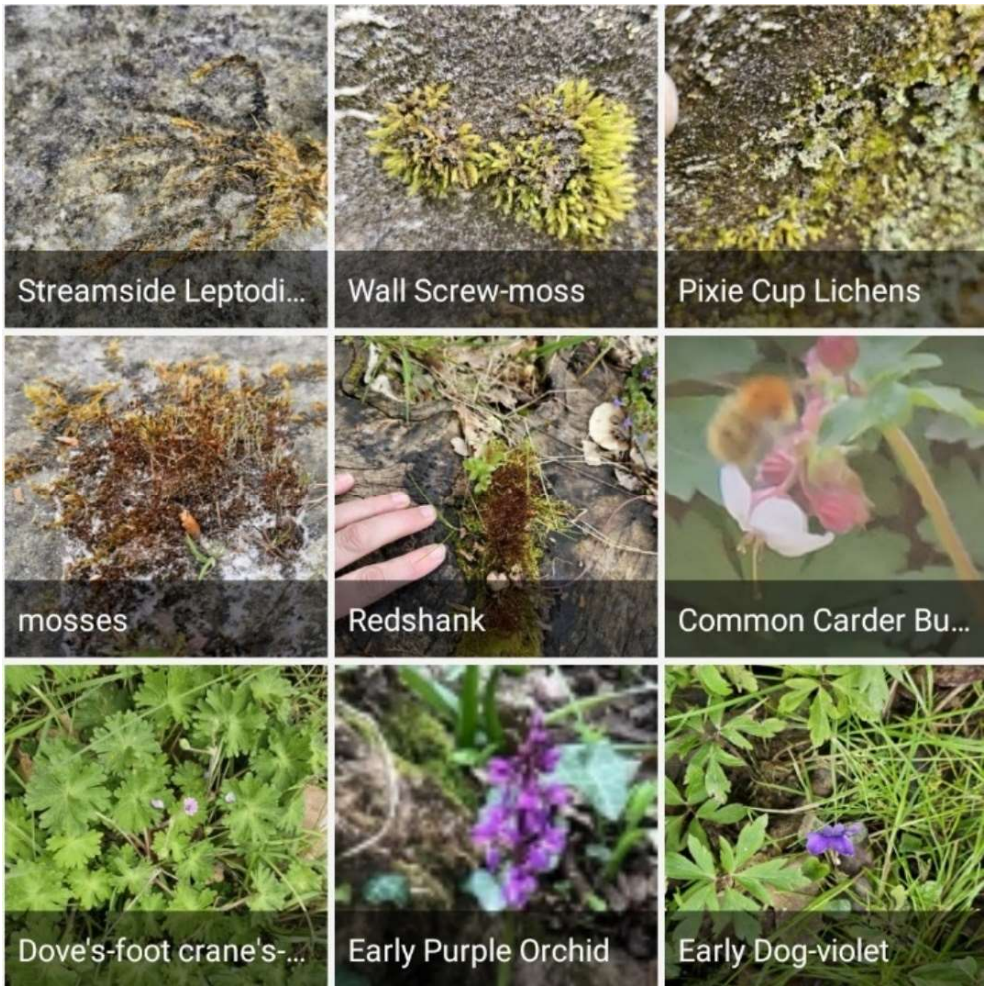

Viviparous Lizard
Western Honey Bee
White-legged Dams...
Lesser hop trefoil
Common Vetch
Rough chervil
Dark Sailor Beetle
Dark Sailor Beetle
Yellow Pimpernel


Dryopteridoideae
Tormentil
Common Figwort
Meadow Foxtail
Soft Rush
Hedgerow Crane's-...
Bank Vole
Common Carder Bu...
Common Carder Bu...


Holly Blue
Changing Forget-m...
Sheep's sorrel
Tiger Crane Flies
Barn Swallow
catchweed bedstraw
currants and goose...
Cow Parsley
Common Carder Bu...

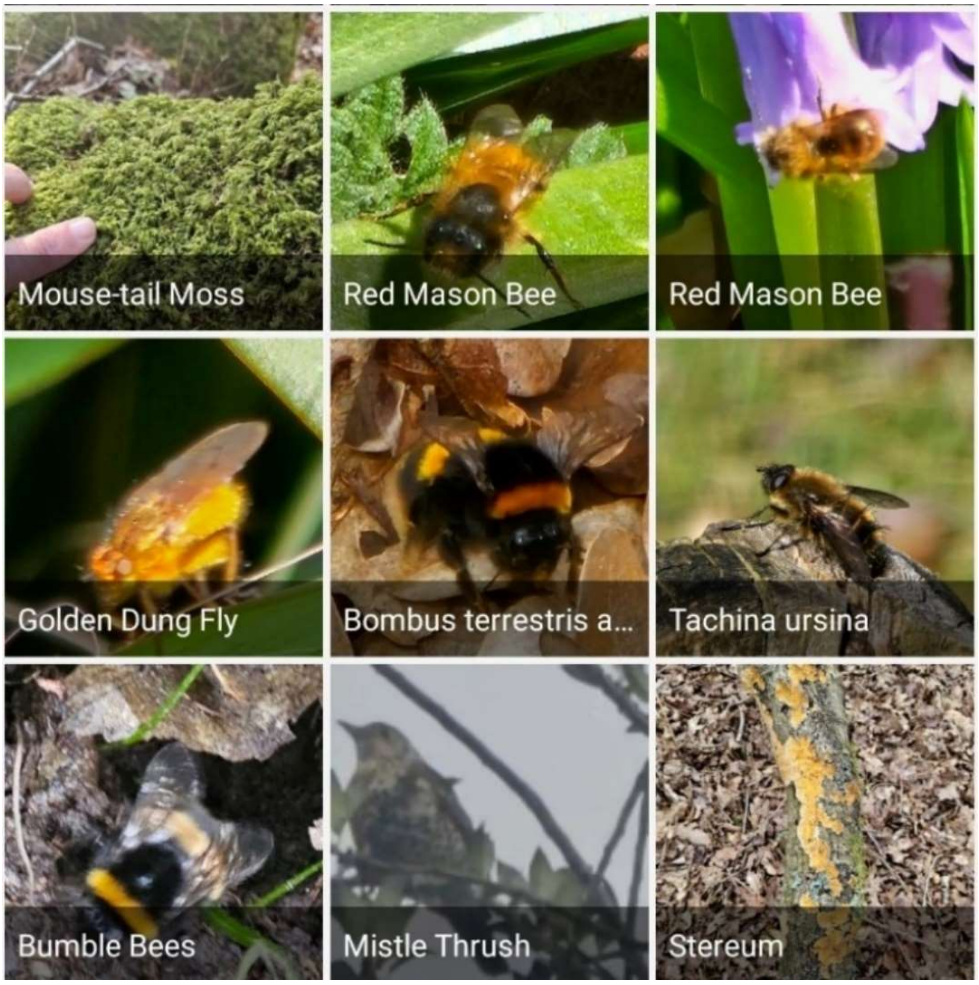

Common Figwort
Common Carder Bu...
Marmalade Hover Fly
Common Carder Bu...
Common Carder Bu...
Mouse-ear Chickwe...
Field woodrush
cinquefoils
lesser celandine

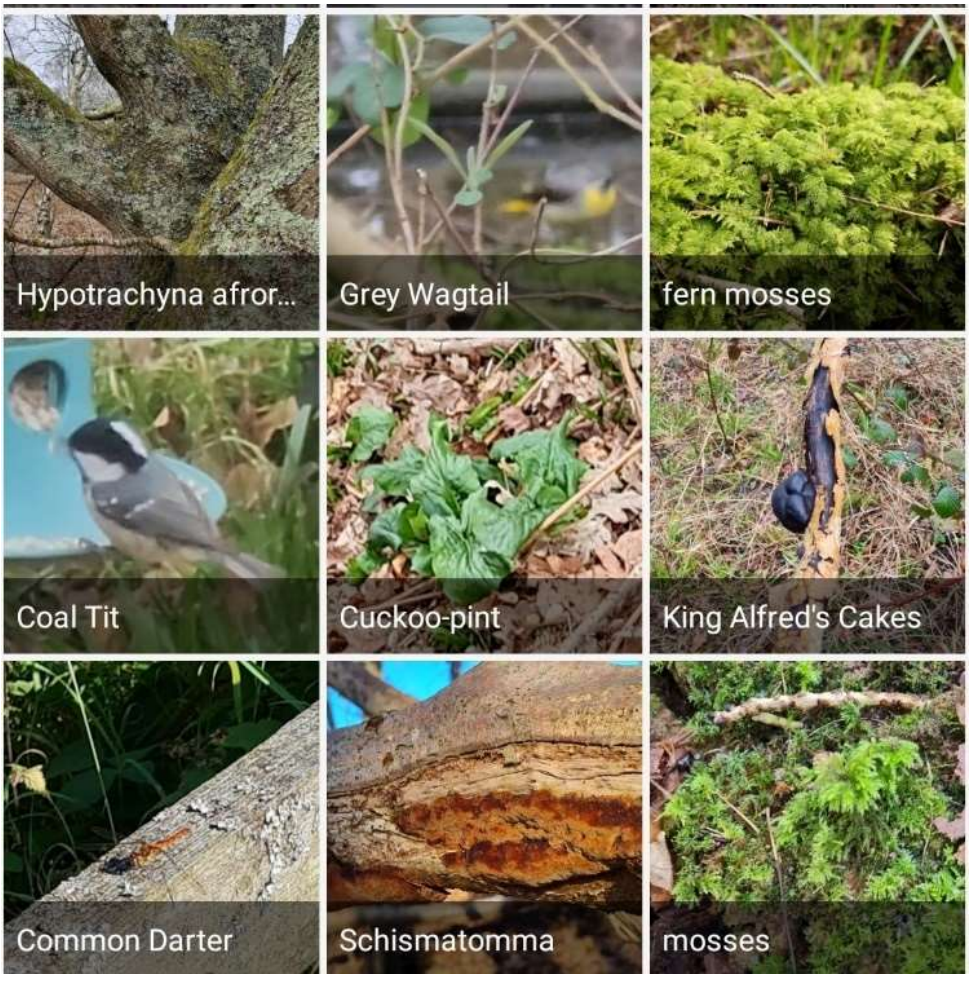

Common Fieldcap
Scaly male fern
Field woodrush
Flesh Flies and Sat...
Thoracobombus
greater stitchwort
mosses
Tormentil
male fern

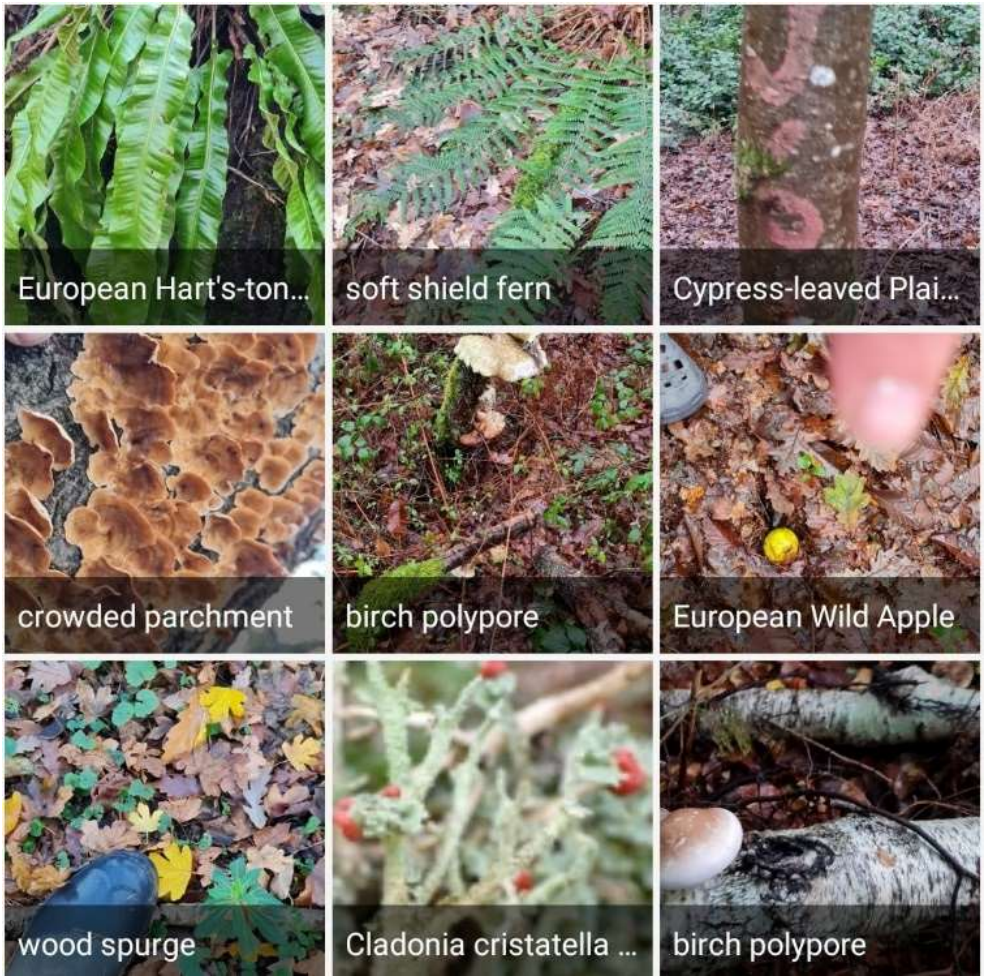

Streamside Leptodi...
Wall Screw-moss
Pixie Cup Lichens
mosses
Redshank
Common Carder Bu...
Dove's-foot crane's-...
Early Purple Orchid
Early Dog-violet

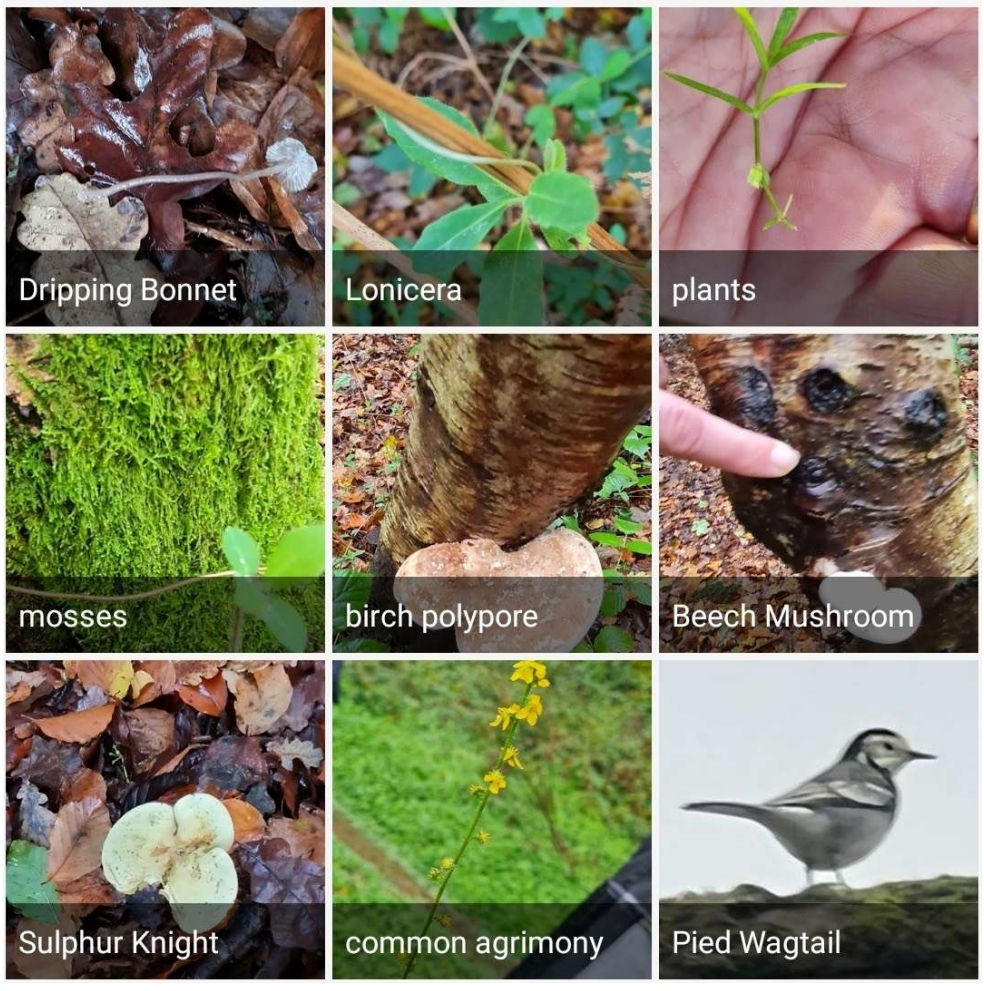

Red-tailed Bumble ...
wild cherry
Coal Tit
Goldilocks Buttercup
Tapered Drone Fly
Red-tailed Bumble ...
Tortula
juniper haircap moss
Orthotrichaceae

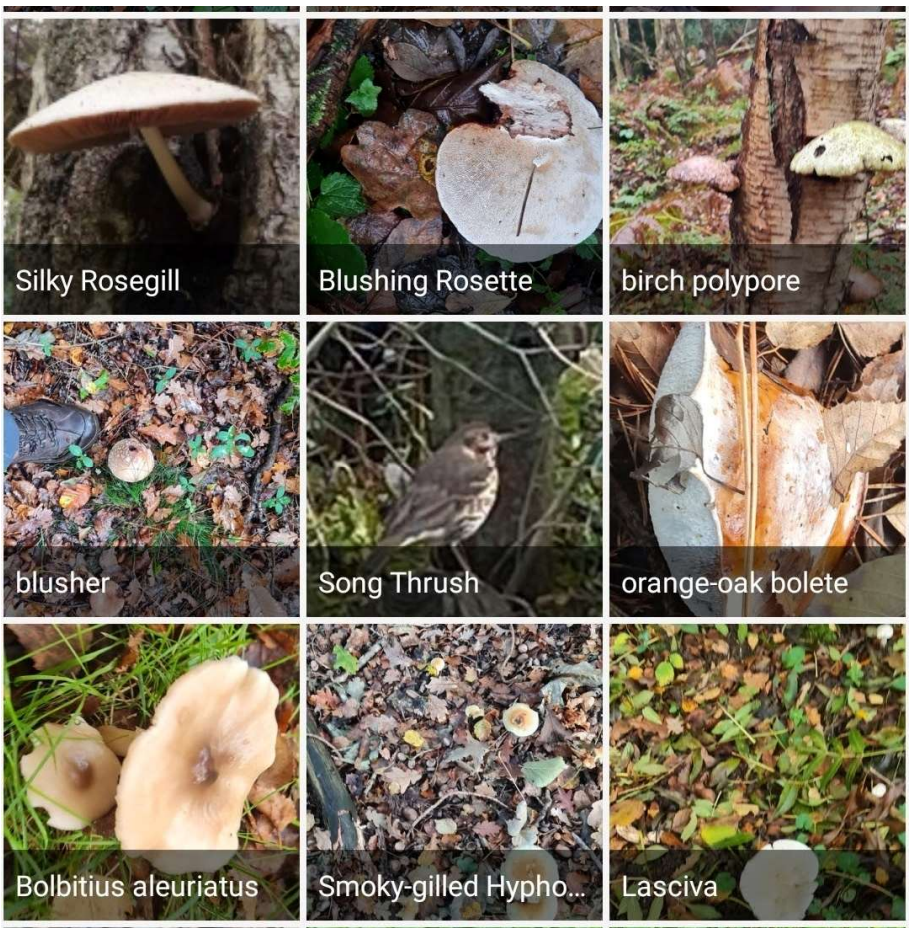

Pixie Cup Lichens
scaly pelt lichen
Sphagnum mosses
Spring Heath
mosses
Pixie Cup Lichens
Trumpet Lichen
Hairy-footed Flower...
Tapered Drone Fly

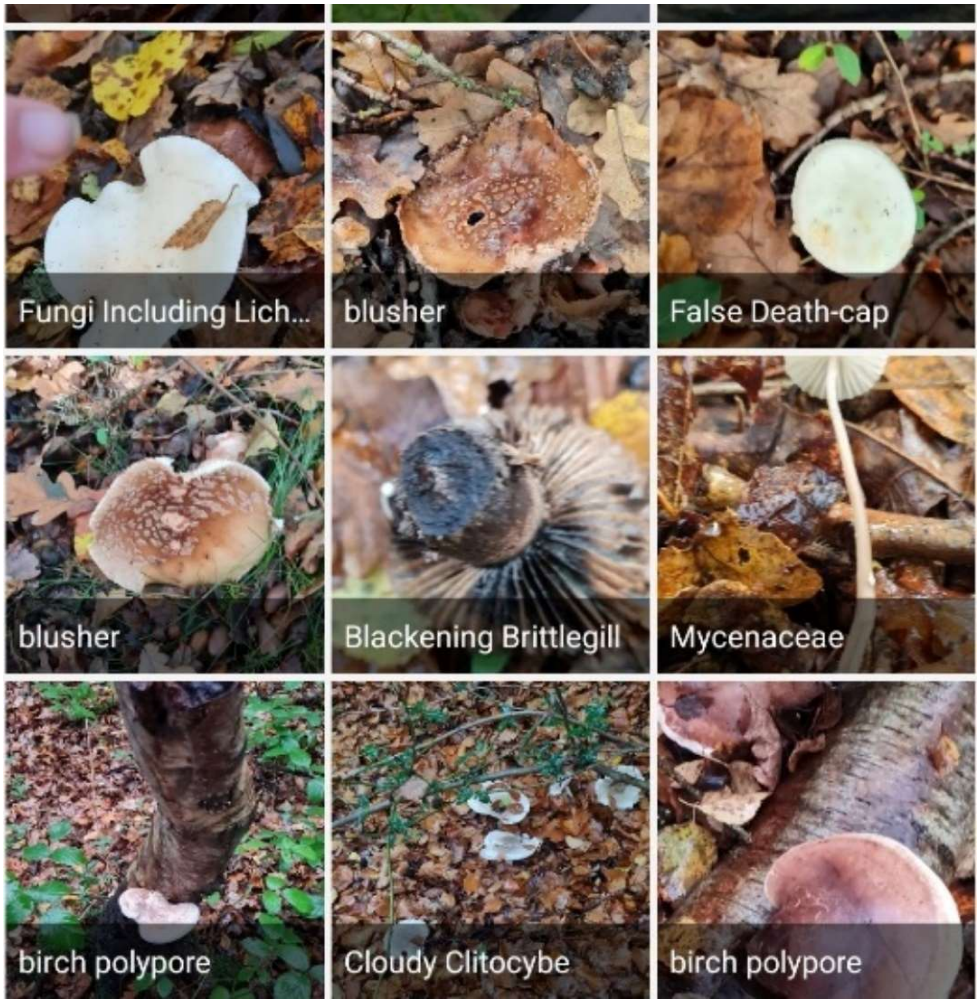

Mouse-tail Moss
Red Mason Bee
Red Mason Bee
Golden Dung Fly
Bombus terrestris a...
Tachina ursina
Bumble Bees
Mistle Thrush
Stereum

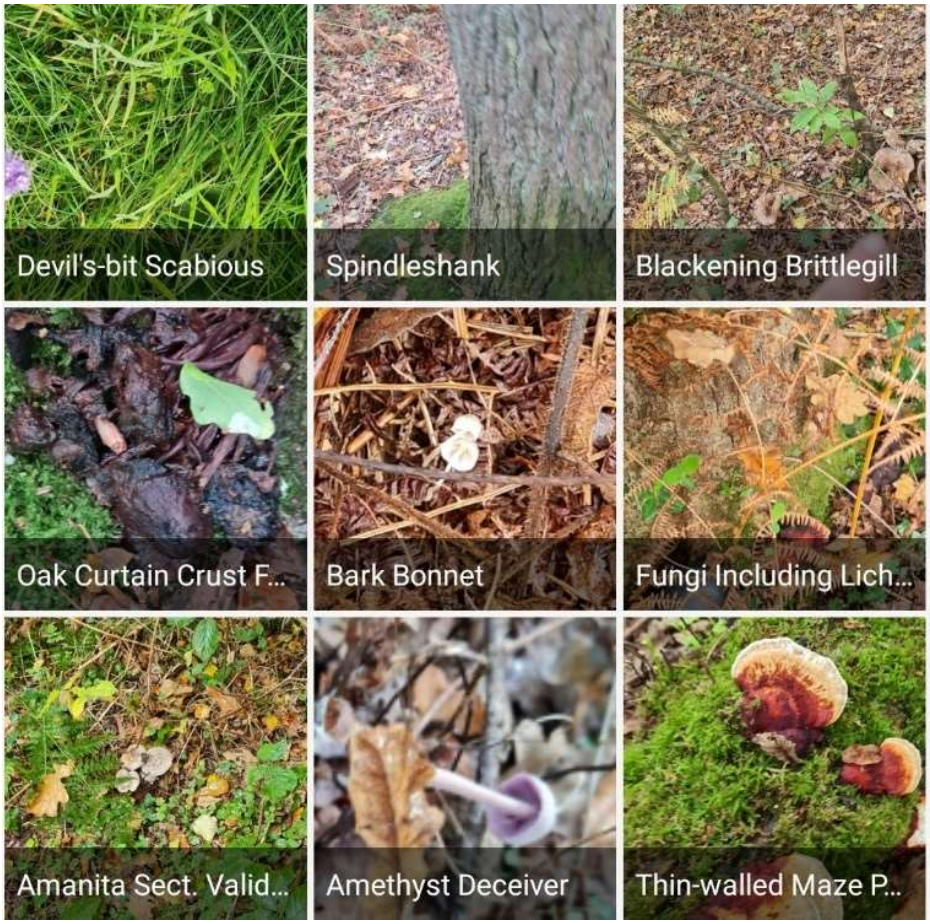

Hypotrachyna afror...
Grey Wagtail
fern mosses
Coal Tit
Cuckoo-pint
King Alfred's Cakes
Common Darter
Schismatomma
mosses


European Hart's-ton...
soft shield fern
Cypress-leaved Plai...
crowded parchment
birch polypore
European Wild Apple
wood spurge
Cladonia cristatella ...
birch polypore


Dripping Bonnet
Lonicera
plants
mosses
birch polypore
Beech Mushroom
Sulphur Knight
common agrimony
Pied Wagtail

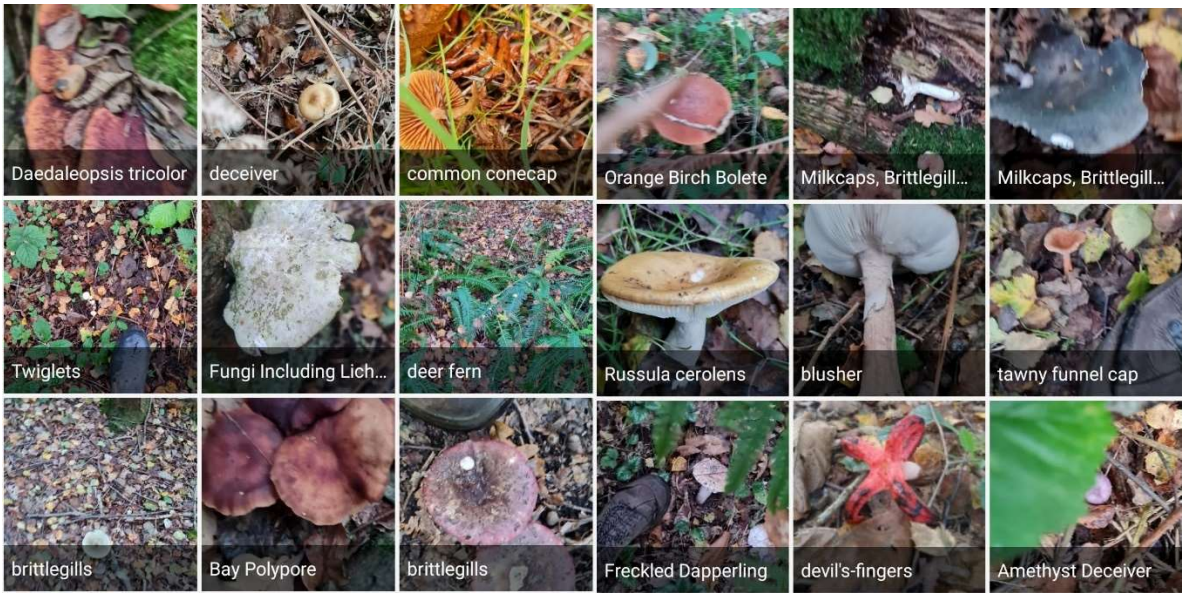

Silky Rosegill
Blushing Rosette
birch polypore
blusher
Song Thrush
orange-oak bolete
Bolbitius aleuriatus
Smoky-gilled Hypho...
Lasciva


Fungi Including Lich...
blusher
False Death-cap
blusher
Blackening Brittlegill
Mycenaceae
birch polypore
Cloudy Clitocybe
birch polypore

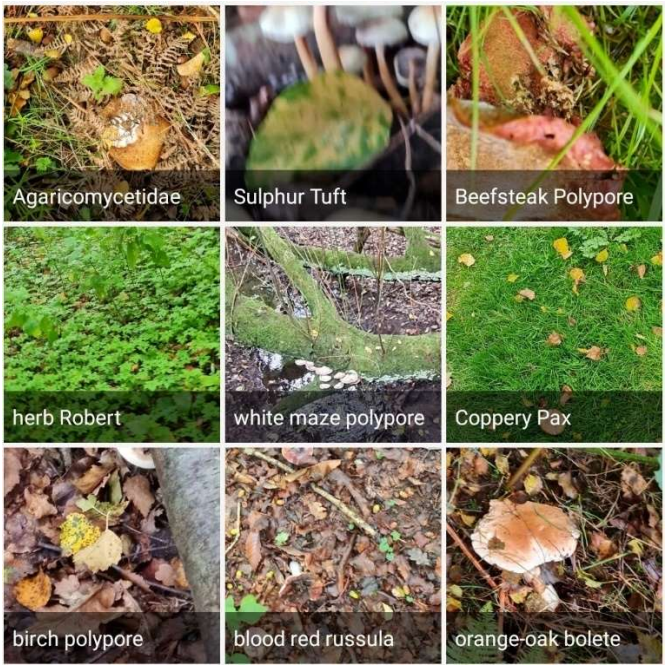


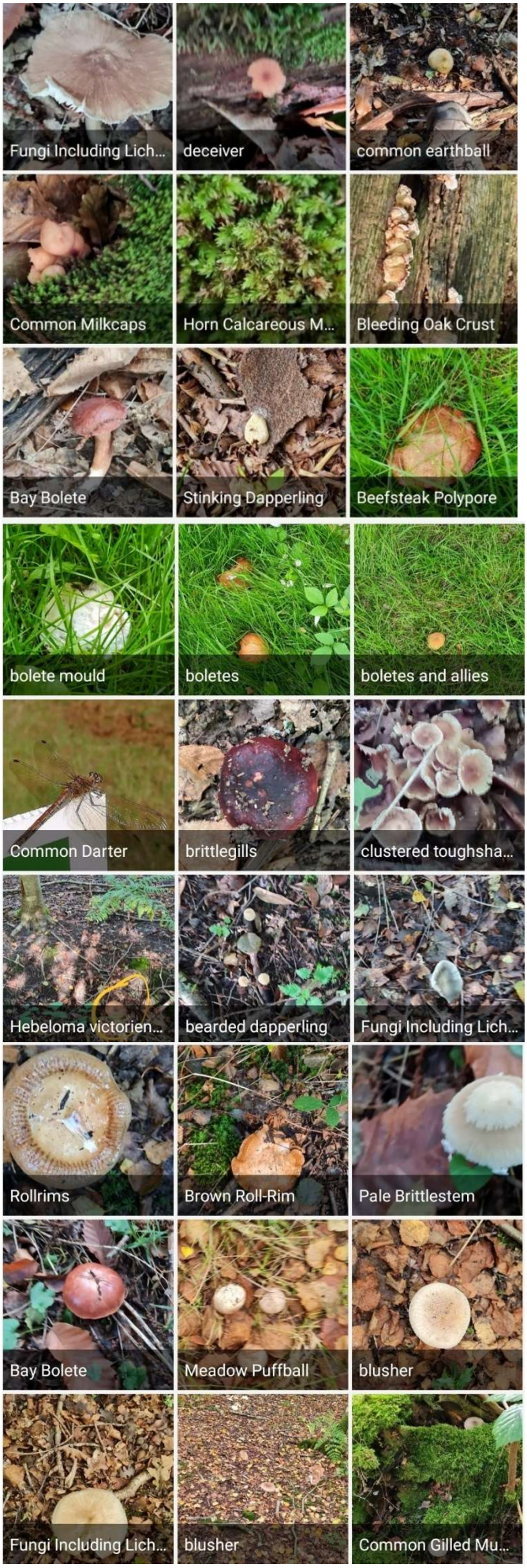


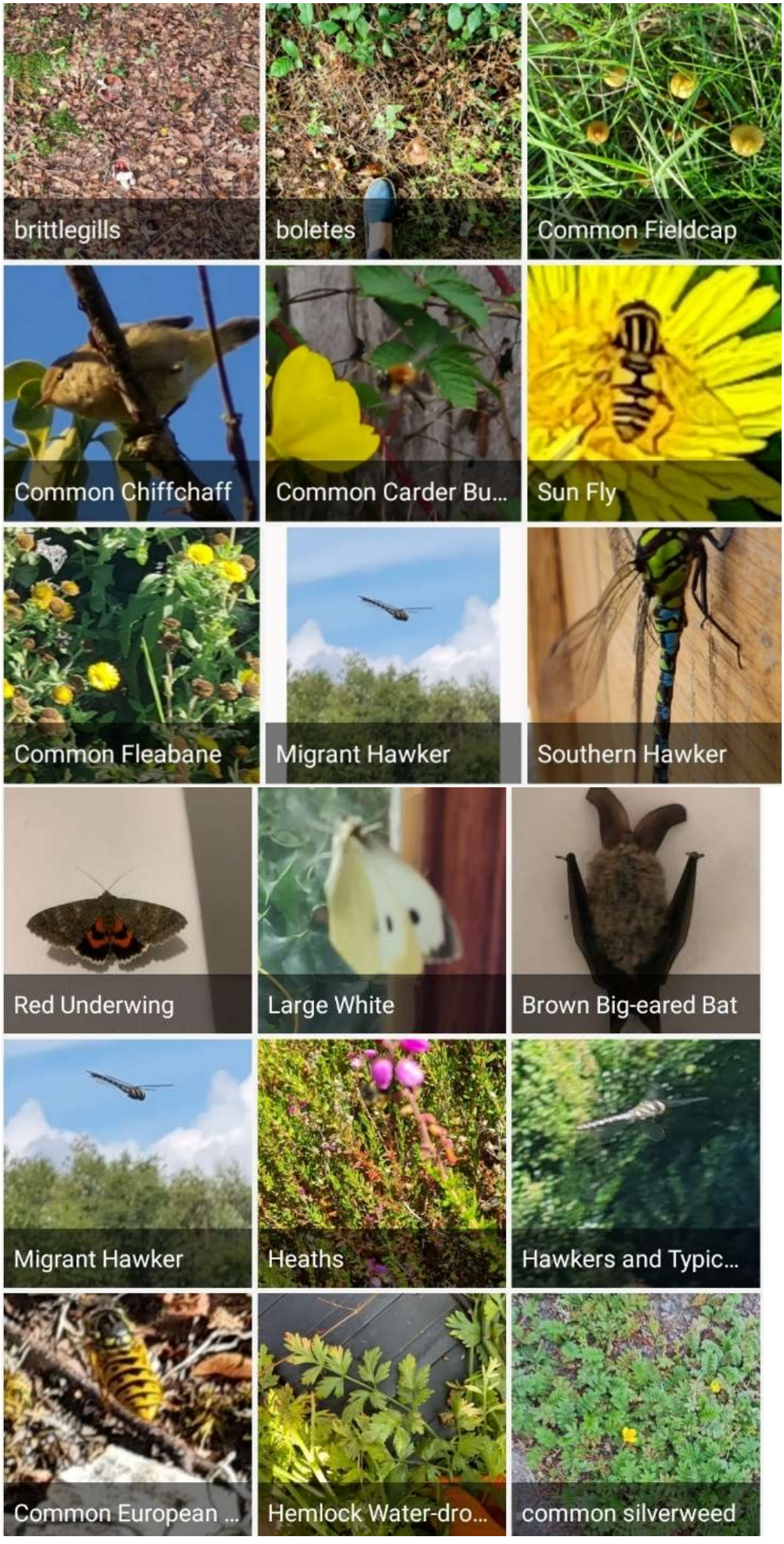
37. The majority of the fungi was from Budletts Wood and Shermanreed ghyll Woodland Autumn 2022. The pictures were the local Downland Farm woodlands unless stated, the observation added to iNaturalist to aid recording and potential/likely species.

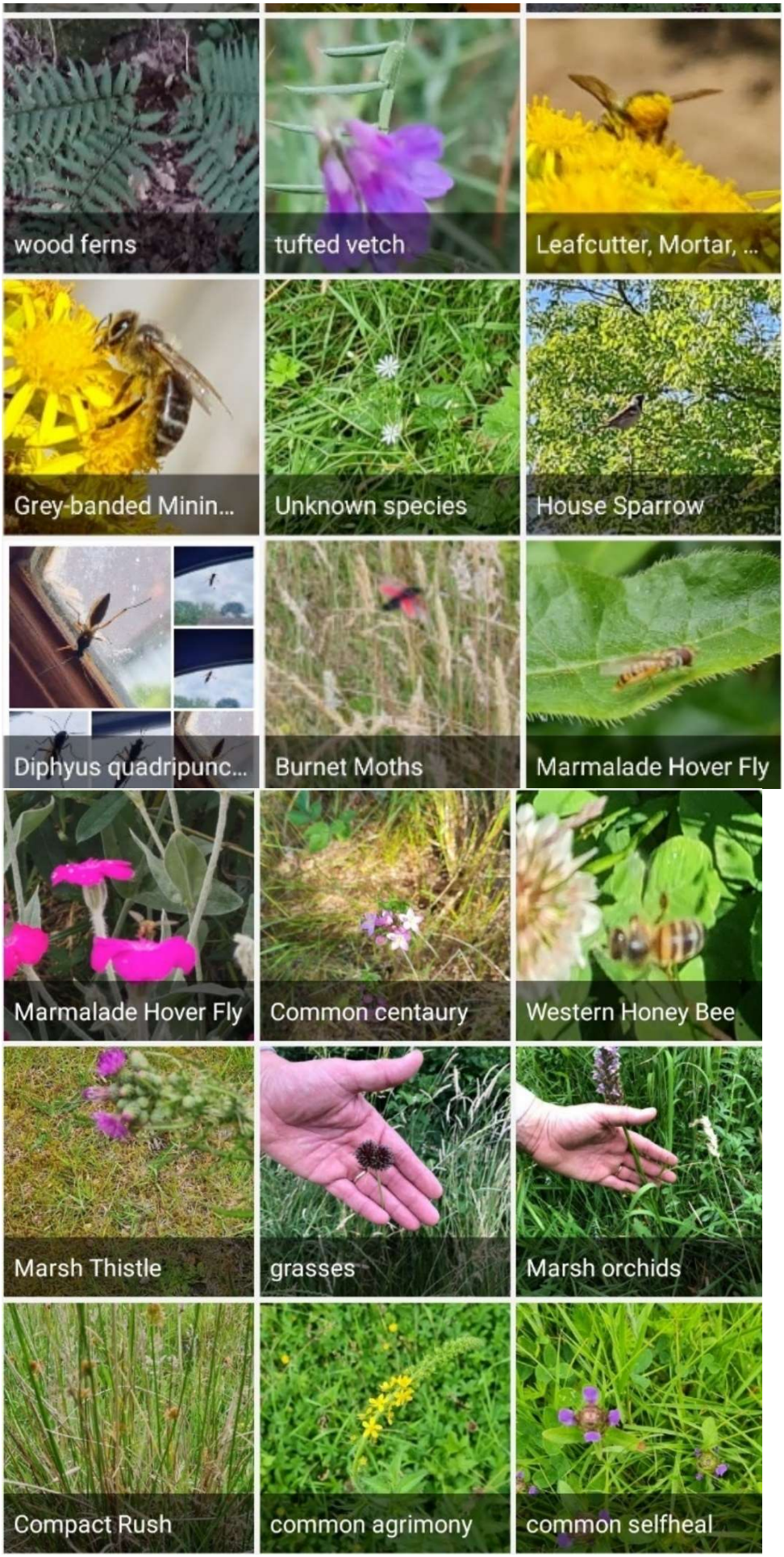

Daedaleopsis tricolor
deceiver
common conecap
Orange Birch Bolete
Milkcaps, Brittlegill...
Milkcaps, Brittlegill...
Twiglets
Fungi Including Lich...
deer fern
Russula cerolens
blusher
tawny funnel cap
brittlegills
Bay Polypore
brittlegills
Freckled Dapperling
devil's-fingers
Amethyst Deceiver


Gymnopus sect. Le...
Common Milkcaps
Fly Agaric
Oyster Mushrooms
fairy ring marasmius
Fungi Including Lich...
Fly Agaric
Tall Psathyrella
Xerocomoideae
brittlegills
Nectria
The Flirt
Oak-loving Trich
Spindleshank
Oakbug Milkcap
yellowing curtain cr...
Bay Bolete
brittlegills


Agaricomycetidae
Sulphur Tuft
Beefsteak Polypore
herb Robert
white maze polypore
Coppery Pax
birch polypore
blood red russula
orange-oak bolete


Fungi Including Lich...
deceiver
common earthball
Common Milkcaps
Horn Calcareous M...
Bleeding Oak Crust
Bay Bolete
Stinking Dapperling
Beefsteak Polypore
bolete mould
boletes
boletes and allies
Common Darter
brittlegills
clustered toughsha...
Hebeloma victorien...
bearded dapperling
Fungi Including Lich...
Rollrims
Brown Roll-Rim
Pale Brittlestem
Bay Bolete
Meadow Puffball
blusher
Fungi Including Lich...
blusher
Common Gilled Mu...

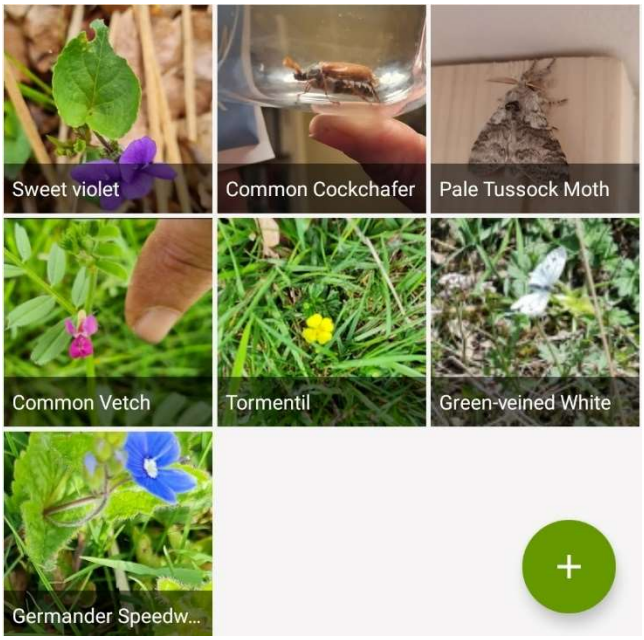

brittlegills
boletes
Common Fieldcap
Common Chiffchaff
Common Carder Bu...
Sun Fly
Common Fleabane
Migrant Hawker
Southern Hawker
Red Underwing
Large White
Brown Big-eared Bat
Migrant Hawker
Heaths
Hawkers and Typic...
Common European ...
Hemlock Water-dro...
common silverweed


wood ferns
tufted vetch
Leafcutter, Mortar, ...
Grey-banded Minin...
Unknown species
House Sparrow
Diphyus quadripunc...
Burnet Moths
Marmalade Hover Fly
Marmalade Hover Fly
Common centaury
Western Honey Bee
Marsh Thistle
grasses
Marsh orchids
Compact Rush
common agrimony
common selfheal


sweet vernal grass
Germander Speedw...
Sheep's sorrel
grasses
woodrushes
Heath Bedstraw
Marbled White-spot
Common Vetch
Marsh orchids
bird's-foot trefoil
black knapweed
sweet vernal grass
Tree Bumble Bee
heath spotted orchid
knapweeds
Common White Wave
Bumble Bees
Dark Sailor Beetle
Beautiful Demoiselle
Small Heath
Northern Bluets
Buff-tailed Bumble ...
Common Carder Bu...
Common Carder Bu...
Brown Silver-line
Early Bumble Bee
Bumble Bees


Bumble Bees
Greater Bee Fly
mosses
mosses
mosses
wood ferns
carpet bugle
Broad-bodied Chaser
Moss Carder bee





38. NB, the 200+ pictures of the species are records of what was seen , some pending confirmation from 350 observations

39. The records highlight the rich assemblage and evidence the diversity of species at Downlands Farm

iRecord Species App

40. This is a mobile app to record observations and species , which are independently assessed. We confirm the following records are for the Downlands Farm local environment unless otherwise stated. Some records are in the queue for independent confirmation, with pictures attached of the species found.

41. This demonstrates further species records for the area not all are on the SxBRC list yet.

Amphibian and Reptile

42. The following records have been added to the Sussex Biodiversity Record Centre (SxBRC) and are pending independent assessment. These are all from 2023 Downlands Farm - demonstrating thriving and healthy population of amphibians and reptiles. Toads in ponds apparently are a priority pond habitat and place them in the top 20% of ponds.

Anguis fragilis	Slow-worm	reptile	Animalia	Squamata	Anguidae	18	05/04/2021	27/08/2023
Zootoca vivipara	Common Lizard	reptile	Animalia	Squamata	Lacertidae	17	15/06/2021	23/05/2023
Natrix helvetica	Grass Snake	reptile	Animalia	Squamata	Colubridae	8	14/07/2020	02/09/2023
Bufo bufo	Common Toad	amphibian	Animalia	Anura	Bufonidae	9	30/10/2020	16/05/2023
Rana temporaria	Common Frog	amphibian	Animalia	Anura	Ranidae	3	21/07/2023	04/08/2023
Rana	Frog	amphibian	Animalia	Anura	Ranidae	2	07/03/2022	01/03/2023
Triturus cristatus	Great Crested Newt	amphibian	Animalia	Caudata	Salamandridae	1	12/05/2023	12/05/2023

43. Pending SxBRC assessment, each with pictures, Downlands Farm include :-
Slow Worm – 17
Common Lizard – 17
Grass Snake – 7
Common Toad – 5
Common Frog – 5
Great Crested Newt – 1

44. SxBRC records for example include the following insects including 6 records of the White Admiral Butterfly – not found by the developers desk-based assessment.

Insects

45. The WD/2006/2855 insect survey of Downlands Farm last planning application demonstrated a site of interest. Why has the developer not referred to this list in their desk-based studies, and why has it not been recorded on the desk-based systems they say they use? It is of concern that their previous ecology reports have not been provided to SxBRC for input to the desk-based systems, and have their current reports been provided to SxBRC for the databases? Development ecologists advise they review desk-based records, but the system also needs their reports to be included as well.

46. The following is to example the type of insects being observed, and the developers conducted no adequate update to their old Entomology survey yet the last survey advised area was of interest and County important.

47. The following insects are Accepted as considered correct at SxBRC via the iRecord app – Downlands Farm . The butterfly species indicating an environment of woodland and grassland (the grassland an important aspect supporting the woodlands). Within the evidence another butterfly species was advised by a resident.

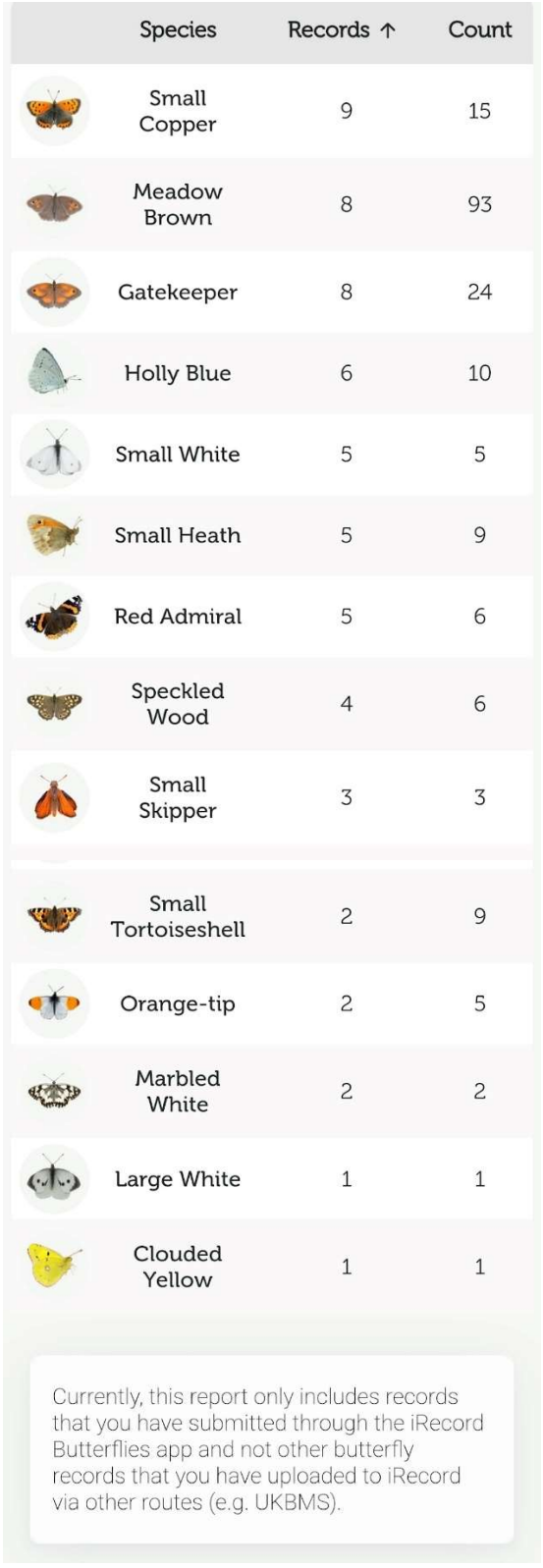
Abax parallelepipedus		insect - beetle (Coleoptera)	Animalia	Coleoptera	Carabidae	1	09/08/2023	09/08/2023
Hybomitra distinguenda	Bright Horsefly	insect - true fly (Diptera)	Animalia	Diptera	Tabanidae	1	20/06/2023	20/06/2023
Bombylius major	Dark-edged Bee-fly	insect - true fly (Diptera)	Animalia	Diptera	Bombyliidae	1	26/04/2023	26/04/2023
Melolontha melolontha	Common Cockchafer	insect - beetle (Coleoptera)	Animalia	Coleoptera	Scarabaeidae	1	31/05/2021	31/05/2021
Rhagonycha fulva	Common Red Soldier Beetle	insect - beetle (Coleoptera)	Animalia	Coleoptera	Cantharidae	1	03/07/2022	03/07/2022
Tachina fera		insect - true fly (Diptera)	Animalia	Diptera	Tachinidae	1	28/07/2023	28/07/2023
Amblyteles armatorius		insect - hymenopteran	Animalia	Hymenoptera	Ichneumonidae	1	23/06/2023	23/06/2023
Bombus vestalis	Vestal Cuckoo Bee	insect - hymenopteran	Animalia	Hymenoptera	Apidae	1	28/06/2021	28/06/2021
Catocala nupta	Red Underwing	insect - moth	Animalia	Lepidoptera	Erebidae	1	27/08/2023	27/08/2023
Colias croceus	Clouded Yellow	insect - butterfly	Animalia	Lepidoptera	Pieridae	1	27/08/2023	27/08/2023
Pieris brassicae	Large White	insect - butterfly	Animalia	Lepidoptera	Pieridae	1	09/08/2023	09/08/2023
Anthophora plumipes	Hairy-footed Flower Bee	insect - hymenopteran	Animalia	Hymenoptera	Apidae	1	09/04/2023	09/04/2023
Bombus hypnorum	Tree Bumblebee	insect - hymenopteran	Animalia	Hymenoptera	Apidae	1	15/06/2022	15/06/2022
Bombus pascuorum	Common Carder Bee	insect - hymenopteran	Animalia	Hymenoptera	Apidae	1	28/05/2022	28/05/2022
Vespa crabro	Hornet	insect - hymenopteran	Animalia	Hymenoptera	Vespidae	1	24/08/2021	24/08/2021
Graphocephala fennahi	Rhododendron Leafhopper	insect - true bug (Hemiptera)	Animalia	Hemiptera	Cicadellidae	1	02/09/2022	02/09/2022
Tachina ursina		insect - true fly (Diptera)	Animalia	Diptera	Tachinidae	1	04/04/2023	04/04/2023
Zygaena filipendulae stephensi	Six-spot Burnet	insect - moth	Animalia	Lepidoptera	Zygaenidae	1	20/07/2021	20/07/2021
Melanargia galathea serena	Marbled White	insect - butterfly	Animalia	Lepidoptera	Nymphalidae	1	14/07/2021	14/07/2021
Agriphila tristella	Common Grass-veneer	insect - moth	Animalia	Lepidoptera	Crambidae	1	21/08/2023	21/08/2023

Accepted name	Common name	Group	Kingdom	Order	Family	No. of records	First record	Last record
		insect						
Maniola jurtina	Meadow Brown	insect - butterfly	Animalia	Lepidoptera	Nymphalidae	19	12/08/2020	21/08/2023
Lycaena phlaeas	Small Copper	insect - butterfly	Animalia	Lepidoptera	Lycaenidae	13	11/08/2021	09/09/2023
Pyronia tithonus	Gatekeeper	insect - butterfly	Animalia	Lepidoptera	Nymphalidae	12	04/08/2021	17/08/2023
Vanessa atalanta	Red Admiral	insect - butterfly	Animalia	Lepidoptera	Nymphalidae	11	26/06/2021	06/08/2023
Coenonympha pamphilus	Small Heath	insect - butterfly	Animalia	Lepidoptera	Nymphalidae	11	26/05/2021	09/08/2023
Polygonia c-album	Comma	insect - butterfly	Animalia	Lepidoptera	Nymphalidae	10	12/07/2021	09/08/2023
Pararge aegeria	Speckled Wood	insect - butterfly	Animalia	Lepidoptera	Nymphalidae	9	08/09/2021	09/08/2023
Argynnis paphia	Silver-washed Fritillary	insect - butterfly	Animalia	Lepidoptera	Nymphalidae	8	12/07/2021	26/07/2023
Aglais urticae	Small Tortoiseshell	insect - butterfly	Animalia	Lepidoptera	Nymphalidae	7	15/06/2021	20/07/2023
Celastrina argiolus	Holly Blue	insect - butterfly	Animalia	Lepidoptera	Lycaenidae	7	06/05/2022	30/08/2023
Aglais io	Peacock	insect - butterfly	Animalia	Lepidoptera	Nymphalidae	7	12/02/2021	21/07/2023
Limenitis camilla	White Admiral	insect - butterfly	Animalia	Lepidoptera	Nymphalidae	6	16/07/2020	17/06/2022
Aeshna cyanea	Southern Hawker	insect - dragonfly (Odonata)	Animalia	Odonata	Aeshnidae	5	28/08/2022	06/09/2023
Libellula depressa	Broad-bodied Chaser	insect - dragonfly (Odonata)	Animalia	Odonata	Libellulidae	5	11/06/2023	24/06/2023
Pieris rapae	Small White	insect - butterfly	Animalia	Lepidoptera	Pieridae	5	25/08/2022	01/09/2023
Gonepteryx rhamni	Brimstone	insect - butterfly	Animalia	Lepidoptera	Pieridae	5	09/05/2021	14/05/2023
Melanargia galathea	Marbled White	insect - butterfly	Animalia	Lepidoptera	Nymphalidae	5	01/07/2021	23/06/2023
Ochlodes sylvanus	Large Skipper	insect - butterfly	Animalia	Lepidoptera	Lepidoptera	5	13/07/2021	26/07/2023
Platycnemis pennipes	White-legged Damselfly	insect - dragonfly (Odonata)	Animalia	Odonata	Platycnemididae	4	23/05/2023	24/06/2023
Anax imperator	Emperor Dragonfly	insect - dragonfly (Odonata)	Animalia	Odonata	Aeshnidae	4	24/06/2021	23/06/2023
Vanessa cardui	Painted Lady	insect - butterfly	Animalia	Lepidoptera	Nymphalidae	4	28/05/2022	09/08/2023
Aphantopus hyperantus	Ringlet	insect - butterfly	Animalia	Lepidoptera	Nymphalidae	4	12/08/2021	01/08/2023
Thymelicus sylvestris	Small Skipper	insect - butterfly	Animalia	Lepidoptera	Hesperiidae	4	17/06/2022	23/06/2023
Apis mellifera	Western Honey Bee	insect - hymenopteran	Animalia	Hymenoptera	Apidae	4	23/05/2023	14/08/2023
Eristalis pertinax		insect - true fly (Diptera)	Animalia	Diptera	Syrphidae	3	09/04/2023	01/09/2023
Pieris napi	Green-veined White	insect - butterfly	Animalia	Lepidoptera	Pieridae	3	06/05/2022	01/09/2023
Polyommatus icarus	Common Blue	insect - butterfly	Animalia	Lepidoptera	Lycaenidae	3	19/07/2022	21/08/2023
Lasius flavus	Yellow Meadow Ant	insect - hymenopteran	Animalia	Hymenoptera	Formicidae	3	03/01/2023	21/04/2023
Aricia agestis	Brown Argus	insect - butterfly	Animalia	Lepidoptera	Lycaenidae	3	13/06/2023	27/08/2023
Calopteryx virgo	Beautiful Demoiselle	insect - dragonfly (Odonata)	Animalia	Odonata	Calopterygidae	2	25/06/2023	25/06/2023

Sympetrum striolatum	Common Darter	insect - dragonfly (Odonata)	Animalia	Odonata	Libellulidae	2	04/08/2023	04/09/2023
Petrophora chlorosata	Brown Silver-line	insect - moth	Animalia	Lepidoptera	Geometridae	2	11/06/2023	11/06/2023
Volucella inanis		insect - true fly (Diptera)	Animalia	Diptera	Syrphidae	2	11/08/2023	21/08/2023
Machimus atricapillus	Kite-tailed Robberfly	insect - true fly (Diptera)	Animalia	Diptera	Asilidae	2	17/08/2023	25/08/2023
Coccinella septempunctata	7-spot Ladybird	insect - beetle (Coleoptera)	Animalia	Coleoptera	Coccinellidae	2	24/06/2023	30/06/2023
Lampyris noctiluca	Glow-worm	insect - beetle (Coleoptera)	Animalia	Coleoptera	Lampyridae	2	28/06/2022	07/07/2023
Eriothrix rufomaculata		insect - true fly (Diptera)	Animalia	Diptera	Tachinidae	2	18/07/2023	28/07/2023
Pyrausta aurata	Small Purple & Gold	insect - moth	Animalia	Lepidoptera	Crambidae	2	10/08/2023	16/08/2023
Anthocharis cardamines	Orange-tip	insect - butterfly	Animalia	Lepidoptera	Pieridae	2	03/05/2023	13/05/2023
Bombus pratorum	Early Bumblebee	insect - hymenopteran	Animalia	Hymenoptera	Apidae	2	07/06/2021	22/05/2022
Bombus terrestris	Buff-tailed Bumblebee	insect - hymenopteran	Animalia	Hymenoptera	Apidae	2	15/06/2021	28/05/2022
Plebejus argus	Silver-studded Blue	insect - butterfly	Animalia	Lepidoptera	Lycaenidae	1	22/06/2021	22/06/2021
Pyrrhosoma nymphula	Large Red Damselfly	insect - dragonfly (Odonata)	Animalia	Odonata	Coenagrionidae	1	24/06/2023	24/06/2023
Coenagrion puella	Azure Damselfly	insect - dragonfly (Odonata)	Animalia	Odonata	Coenagrionidae	1	26/06/2023	26/06/2023
Cordulegaster boltonii	Golden-ringed Dragonfly	insect - dragonfly (Odonata)	Animalia	Odonata	Cordulegastridae	1	17/08/2023	17/08/2023
Aeshna grandis	Brown Hawker	insect - dragonfly (Odonata)	Animalia	Odonata	Aeshnidae	1	22/07/2021	22/07/2021
Libellula fulva	Scarce Chaser	insect - dragonfly (Odonata)	Animalia	Odonata	Libellulidae	1	24/06/2023	24/06/2023
Zygaena filipendulae	Six-spot Burnet	insect - moth	Animalia	Lepidoptera	Zygaenidae	1	21/07/2021	21/07/2021
Xanthorhoe fluctuata	Garden Carpet	insect - moth	Animalia	Lepidoptera	Geometridae	1	03/06/2021	03/06/2021
Opisthograptis luteolata	Brimstone Moth	insect - moth	Animalia	Lepidoptera	Geometridae	1	28/05/2021	28/05/2021
Cabera pusaria	Common White Wave	insect - moth	Animalia	Lepidoptera	Geometridae	1	15/06/2022	15/06/2022
Tyria jacobaeae	Cinnabar	insect - moth	Animalia	Lepidoptera	Erebidae	1	21/07/2021	21/07/2021
Noctua pronuba	Large Yellow Underwing	insect - moth	Animalia	Lepidoptera	Noctuidae	1	30/07/2023	30/07/2023
Episyrphus balteatus	Marmalade Hoverfly	insect - true fly (Diptera)	Animalia	Diptera	Syrphidae	1	20/07/2021	20/07/2021
Sphaerophoria scripta		insect - true fly (Diptera)	Animalia	Diptera	Syrphidae	1	28/07/2023	28/07/2023
Ferdinandea cuprea		insect - true fly (Diptera)	Animalia	Diptera	Syrphidae	1	09/08/2023	09/08/2023
Eristalis arbustorum		insect - true fly (Diptera)	Animalia	Diptera	Syrphidae	1	01/09/2023	01/09/2023
Eristalis tenax		insect - true fly (Diptera)	Animalia	Diptera	Syrphidae	1	27/08/2023	27/08/2023
Helophilus pendulus		insect - true fly (Diptera)	Animalia	Diptera	Syrphidae	1	08/09/2022	08/09/2022
Myathropa florea		insect - true fly (Diptera)	Animalia	Diptera	Syrphidae	1	28/07/2023	28/07/2023
Merodon equestris	Greater Bulb-Fly	insect - true fly (Diptera)	Animalia	Diptera	Syrphidae	1	24/06/2023	24/06/2023

(The only record out of the Downlands Farm area was The silver studded blue from Cornwall, a notable butterfly for the butterfly records)

48. The iRecord Butterfly app is part of SxBRC and these were recorded at Downlands Farm 2022 and 2023 via the Butterfly app. Of interest, the assemblage of butterflies indicates the importance of the woodlands combined with heath and grassland meadows habitats. The White Admiral butterflies are recorded via iRecord not this app. This is just one list not the combined list of other observers in the area. To our mind, this shows another aspect that the area supports a wide array of species not considered with the updated species records.



Species	Records ↑	Count
Small Copper	9	15
Meadow Brown	8	93
Gatekeeper	8	24
Holly Blue	6	10
Small White	5	5
Small Heath	5	9
Red Admiral	5	6
Speckled Wood	4	6
Small Skipper	3	3
Small Tortoiseshell	2	9
Orange-tip	2	5
Marbled White	2	2
Large White	1	1
Clouded Yellow	1	1

Currently, this report only includes records that you have submitted through the iRecord Butterflies app and not other butterfly records that you have uploaded to iRecord via other routes (e.g. UKBMS).



← BACK Species report

Silver-washed Fritillary	4	19
Peacock	4	7
Ringlet	3	8
Painted Lady	3	22
Large Skipper	3	19
Green-veined White	3	5
Common Blue	3	9
Comma	3	7
Brown Argus	3	23
Brimstone	3	7

49. It is of significance to note the Barbastelle, a scarce species in Sussex and known to be using the area from other local bat surveys including Mr Bell at Gormanstan adjacent to Downlands Farm (we understand the Gormanstan bat survey has been sent to the inspector by 26th September for consideration).

50. It therefore does not seem appropriate the re-consultation dismissed the Barbastelle bat by the developers. It is known in this location from other surveys. It is of concern that it has been dismissed in the re-consultation as these are very suitable habitats for Barbastelle.

51. In addition, we would like to ask for specific advice from the Sussex Bat Conservation experts regarding the Bechstein bat habitats and has the Downlands Farm application lacked appropriate study within the *Myotis sp*. group within their re-consultation and previous reports. The Bechstein has been recorded within the notifiable distance, we understand it is very rare and requires experts and further study to make an assessment as we understand it may be an Annex species and a notifiable bat.

52. The first step of protecting irreplaceable habitat and protected species is to avoid harm, loss and deterioration and the local community feel this applies to the bat species using the area and that the side of Lake Wood and Fir Tree Grove / Gormanstan static recording for all the bats has not been provided.

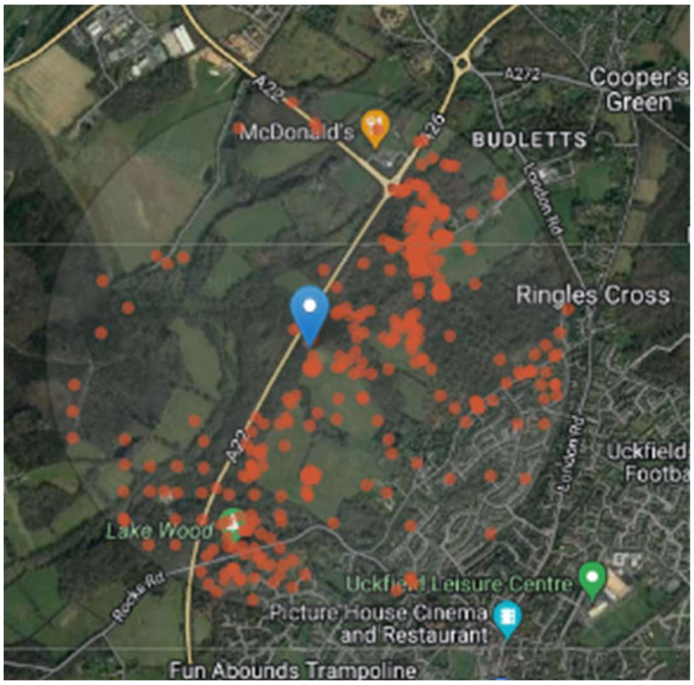
National Biodiversity Network (NBN) and Atlas [1]

53. NBN is included as an example due to the re-consultation we checked other species recorded and accessible via desk-based systems.

54. We checked an easy-to-use system called National Biodiversity Network (NBN) Atlas [2] which is an online dataset and described as "*The NBN Atlas is the UK's largest repository of publicly available biodiversity data, with more than 200 million records of over 46,000 UK species. This is a vital resource for those who wish to understand and protect nature"* and data from this independent system has therefore been included as we also consider it as a "desk-based" facility apparently not referenced by the developers. For example, the White Admiral was discounted as not in the area by the developers, yet new records are in 2022.

55. The NBN Atlas is an independent system collating some of the records from other independent services. The map shows the area explored with a 1km radius around Downlands.

56. NBN records indicate there are some 6220+- independent records for 762 species for Downlands Farm with a 1km radius. These records are a powerful additional resource to demonstrate how important the species are in this area.



57. NBN map for the following group of species, 1km radius from centre of Downlands Farm, North Uckfield.

[1] https://records.nbnatlas.org/explore/your-area#50.9830|0.0874|14|ALL_SPECIES
[2] https://nbnatlas.org/

Example species from NBN

58. Table of NBN Summary Species 1km radius, Downlands Farm. Of note, 315 insects have been identified and 73 birds , in addition to SxBRC identifying 118 birds for the area.

59. The NBN Atlas list is available for free download , however, we thought 6220 species records may not be appropriate for the inquiry and note that it is available on line if required.

Group	Species
Allspecies	**762**
Animals	423
Amphibians	5
Arthropods	315
Crustaceans	0
Insects	315
Myriapods	0
SpidersandAllies	0
Birds	73
Fishes	1
Mammals	18
Molluscs	4
Reptiles	4
Worms	0
Bacteria	0
Chromista	0
Fungi	67
Plants	272
Algae	0
Bryophytes	121
ClubmossesandFirmosses	0
FernsandAllies	3
FloweringPlants	146
GymnospermsandGinkgo	2
Hornworts	0
Protozoa	0

60. In the NBN records there are 67 fungi species in the area, how do they know which ones are in the ancient woodland ground proposed to be changed? Or potentially up to 272 plants and which ones are within the Downlands area and evidenced nearby within the radius. Pictures of fungi are noted on the iNaturalist list.

61. Of note, the NBN highlights 315 insects within the radius of Downlands Farm, independently verified within the Downlands Farm area.

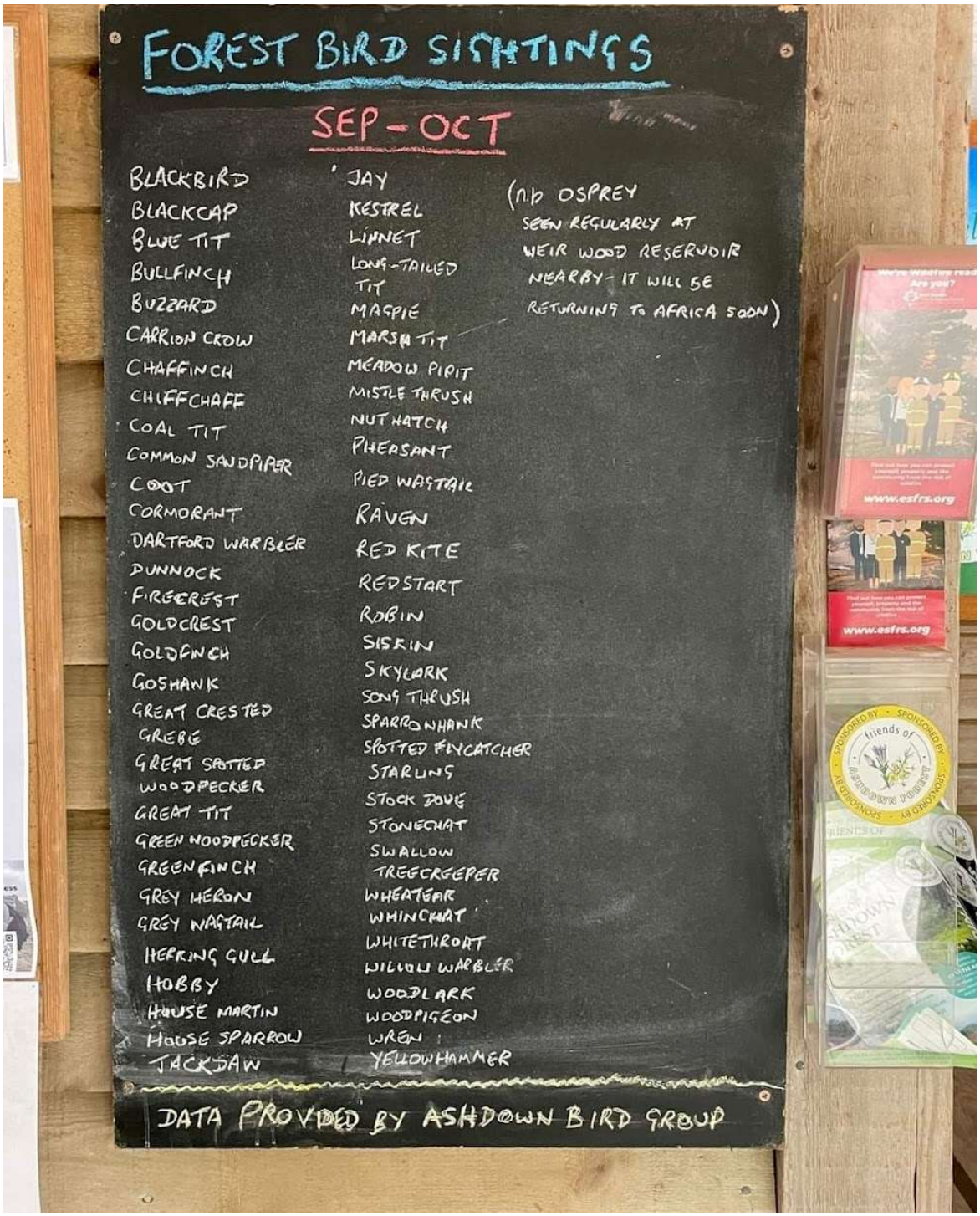
62. Walkers know there are more birds here than the developers have been able to record with a few site visits. The community are very concerned about the assemblage of birds using Downlands, SxBRC indicated 118, some are very scarce and endangered species have been missed including a locally known Annex 1 bird, the owl population, and many other prioirty species which visit and Lake Wood etc. The following is a list of birds from NBN which should be cross-referenced to other species lists available.

	Common Name	Species	Records
1.	Blue Tit	*Cyanistes caeruleus*	249
2.	Blackbird	*Turdus merula*	245
3.	Collared Dove	*Streptopelia decaocto*	239
4.	Chaffinch	*Fringilla coelebs*	238
5.	Robin	*Erithacus rubecula*	237
6.	Dunnock	*Prunella modularis*	233
7.	Great Tit	*Parus major*	231
8.	Woodpigeon	*Columba palumbus*	223
9.	House Sparrow	*Passer domesticus*	206
10.	Greenfinch	*Chloris chloris*	203
11.	Starling	*Sturnus vulgaris*	196
12.	Goldfinch	*Carduelis carduelis*	195
13.	Coal Tit	*Periparus ater*	186
14.	Nuthatch	*Sitta europaea*	183
15.	Magpie	*Pica pica*	181
16.	Great Spotted Woodpecker	*Dendrocopos major*	161
17.	Song Thrush	*Turdus philomelos*	135
18.	Wren	*Troglodytes troglodytes*	134
19.	Long-tailed Tit	*Aegithalos caudatus*	81
20.	Rock Dove	*Columba livia*	67
21.	Jackdaw	*Coloeus monedula*	61
22.	Carrion Crow	*Corvus corone*	54
23.	Siskin	*Spinus spinus*	33
24.	Pied Wagtail	*Motacilla alba*	29
25.	Chiffchaff	*Phylloscopus collybita*	22
26.	Jay	*Garrulus glandarius*	19

	Common Name	Species	Records
27.	Blackcap	*Sylvia atricapilla*	19
28.	Goldcrest	*Regulus regulus*	16
29.	Bullfinch	*Pyrrhula pyrrhula*	14
30.	Swift	*Apus apus*	9
31.	Green Woodpecker	*Picus viridis*	9
32.	Mute Swan	*Cygnus olor*	8
33.	Kestrel	*Falco tinnunculus*	8
34.	Skylark	*Alauda arvensis*	7
35.	Canada Goose	*Branta canadensis*	7
36.	Herring Gull	*Larus argentatus*	7
37.	Mallard	*Anas platyrhynchos*	6
38.	Greylag Goose	*Anser anser*	6
39.	Grey Heron	*Ardea cinerea*	6
40.	Rook	*Corvus frugilegus*	6
41.	Black-headed Gull	*Chroicocephalus ridibundus*	5
42.	House Martin	*Delichon urbicum*	5
43.	Moorhen	*Gallinula chloropus*	5
44.	Marsh Tit	*Poecile palustris*	5
45.	Tawny Owl	*Strix aluco*	5
46.	Treecreeper	*Certhia familiaris*	4
47.	Pheasant	*Phasianus colchicus*	4
48.	Mistle Thrush	*Turdus viscivorus*	4
49.	Lesser Redpoll	*Acanthis cabaret*	3
50.	Red-legged Partridge	*Alectoris rufa*	3
52.	Cuckoo	*Cuculus canorus*	3

	Common Name	Species	Records
48.	Mistle Thrush	*Turdus viscivorus*	4
49.	Lesser Redpoll	*Acanthis cabaret*	3
50.	Red-legged Partridge	*Alectoris rufa*	3
52.	Cuckoo	*Cuculus canorus*	3
53.	Whitethroat	*Curruca communis*	3
54.	Lesser Spotted Woodpecker	*Dryobates minor*	3
55.	Willow Warbler	*Phylloscopus trochilus*	3
56.	Mandarin Duck	*Aix galericulata*	2
57.	Stock Dove	*Columba oenas*	2
58.	Lesser Whitethroat	*Curruca curruca*	2
59.	Coot	*Fulica atra*	2
60.	Swallow	*Hirundo rustica*	2
61.	Common Gull	*Larus canus*	2
62.	Pied Wagtail	*Motacilla alba yarrellii*	2
63.	Garden Warbler	*Sylvia borin*	2
64.	Redwing	*Turdus iliacus*	2
65.	Kingfisher	*Alcedo atthis*	1
66.	Meadow Pipit	*Anthus pratensis*	1
67.	Brambling	*Fringilla montifringilla*	1
68.	Lesser Black-backed Gull	*Larus fuscus*	1
69.	Linnet	*Linaria cannabina*	1
70.	Nightingale	*Luscinia megarhynchos*	1
71.	Cormorant	*Phalacrocorax carbo*	1
72.	Redstart	*Phoenicurus phoenicurus*	1
73.	Woodcock	*Scolopax rusticola*	1
74.	Fieldfare	*Turdus pilaris*	1

63. Of note, the Ashdown Forest bird species for Sept and Oct 2023 has been published, it is noted below (extract from Facebook Ashdown Forest). As you can see in Autumn there are many similarities to the Downlands Farm and Lake Wood species lists, both the heritage landscapes are only a few km apart and literally face each other (in landscape setting and aspect) though we do not recall seeing Osprey!



64. The NBN system has a key online for their charts and gives a chart colour coded to groups of species. This gives an indication of the breadth of assemblage of species, highlighted by the NBN records, not referenced by the developers.

65. Downloaded from NBN referenced above, the NBN Charts for Downlands Farm 1km radius by Species grouped by

- a. Family and
- b. Genus

By family



By genus

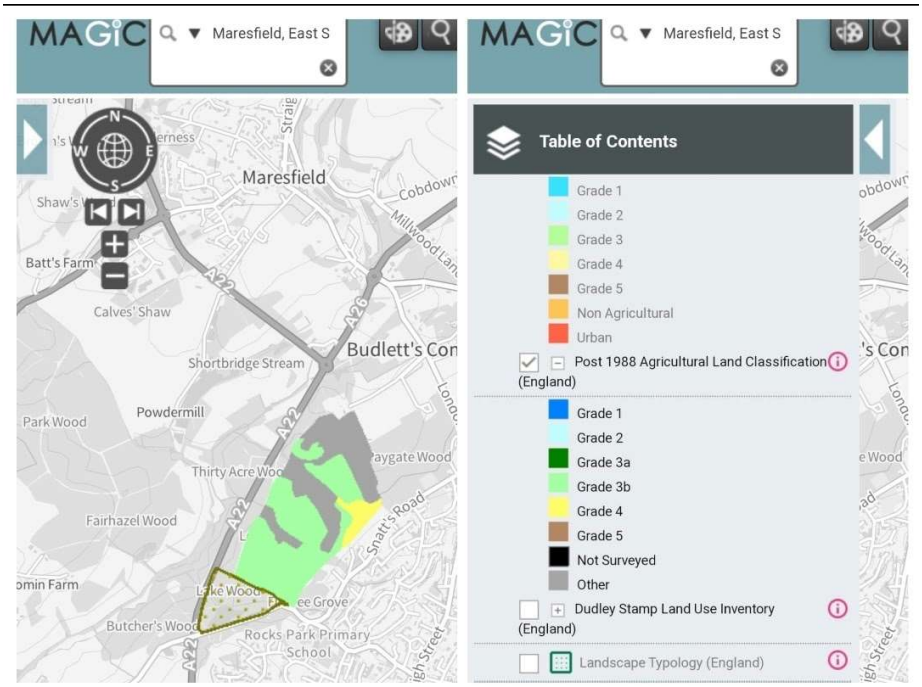


New Boardwalk path & Budletts Wood clearing 4C – restorable heath and acid soil habitat in ancient woodland

66. The proposed boardwalk impacts restorable heather habitats which are rare. WD/2006/2855 (copy below) described the woodlands as an important National Vegetation Classification. This included heathy woodland compartment W16 describes the heather we believe may be part of the area the proposed board walk may go over – a rare habitat of acid well drained soils. This area used to have much more heather 15-20 years or so ago and why has so much heather since disappeared which was also recorded in WD/2006/2855. Remnants of the heather are still present and restorable, with acid species indicators such as tormentil and devil's bit scabious present. In spring the area is abundant in other AW species such as bluebell. Volumes of visitors impacting the woodlands will not achieve this tranquil spot achieving any form of meaningful high distinctiveness or heathland. The boardwalk goes over the remnants of heather, tormentil, bluebell, devil's bit scabious.

67. Of concern relating to the SANGS re-consultation, we referred back to the MAGIC map system and were alarmed to find these records of Downlands Farm (map below). The ancient woodland area within Budletts Wood clearing (4c ?) in ancient woodland with acid species indicators and bluebell woodlands, why is it not shown on the maps as priority habitat and now shows as a soil category 3? This is a rare habitat of both ancient woodland and restorable lowland heath. Soil grade 3 hardly reflects the habitat.

68. The developers report advised it had now provided a baseline for Downlands Farm, why are the records downgrading these habitats but how can it have provided a baseline if it is not recorded on MAGIC correctly? For example, of great concern is the restorable priority acid habitat IN the ancient woodlands of Budletts Common. Why has it been amended to soil group 3? In addition, the Oak Parkland area proposed for the SANGS, off Snatts road, has been shown as scrub by the developer. How can this be accurate when the Woodland Trust maps and the RAF maps of 1959 show the woodlands including this area off Snatts Road. How can MAGIC now record woodland habitats with huge stands of oak between Paygate Wood and Shermanreed Ghyll just as a grade 4 soil. What is happening to these local map records of this remarkable habitat? The MAGIC map area below appears to correspond to the ecology maps of the developers. We would be extremely grateful if independent assessments and map updates can be recommended.



69. Due to the re-consultation, we referred back to the woodland evidence in their previous application and copied their assessment from WD/2006/2855 below W16 likely the Budletts Wood clearing in this latest application 4c evidencing the heather and acid soils.

The following are important National Vegetation Classification types recorded at Downlands Farm:

Dry Woodlands

Bramble Bracken Woodland W10

W10a *Quercus robur-Pteridium aquilinum-Rubus fruticosus* woodland is the predominant woodland type at Downlands Farm occuring on base poor soils. Almost all stands of W10 are ancient woodland though many lack mature trees. Bluebells are locally abundant in the ancient W10 stands.

Heathy Woodland W16

W16 *Quercus* spp.–*Betula* spp.–*Deschampsia flexuosa* woodland occurs on acid, well drained soils. Heather *Calluna vulgaris* occurs in the more open areas. The main tree species here are Oak and Birch with Rowan *Sorbus aucuparia* occasional. Some areas have Sweet Chestnut *Castanea sativa*.

Maple - Dog's Mercury Woodland

W8 *Fraxinus excelsior–Acer campestre-Mercuralis perennis* woodland occurs where the soils become enriched with bases. The main stand of this woodland type is in Longwood Gill but some localised areas were also noted in Thirty Acre Wood. Species noted in these areas include Maple *Acer campestre*, Yellow Archangel *Galeobdolon luteum* and Dog's Mercury *Mercurialis perennis*. Bracken *Pteridium aquilinum* is rare in W8 stands.

Wet Woodlands

Molinia Woodland W4

W4 *Betula pubescens–Molinia caerulea* woodland. This woodland occurs on damp to wet acid soils and has an understory with Purple Moor-grass *Molinia caerulea* usually accompanied by some Bog Moss *Sphagnum* spp. A localised stand of W4 woodland occurs as part of the Paygate Copse/Budlett's Wood where some rather acid soil has been exposed in a shallow valley.

Flushed Alderwood W7

W7 *Alnus glutinosa-Fraxinus excelsior–Lysimachia nemorum* woodland stands. The alder woods associated with the various watercourses at Downlands are referable to the NVC community Flushed Alderwood W7. The ground flora tends to have Opposite leaved Golden saxifrage *Chrysosplenium oppositifolium* and Yellow Pimpernel *Lysimachia nemorum*.

Acid Grasslands

Parched Acid Grassland **U1** *Festuca ovina-Agrostis capillaris-Rumex acetosella* grassland occurs on acid soils subject to summer droughting. This community can be very rich in species and provides open, warm sandy habitat for a range of invertebrates.

Humid Acid Grassland **U4** *Festuca ovina-Agrostis capillaris Galium saxatile* grassland is restricted to acid sites that are not too wet and which are also not subject to summer droughting.

Wet Grasslands

Rush Pasture **M23a** *Juncus effusus/acutiflorus-Galium palustre* rush pasture, *Juncus acutiflorus* subcommunity. This is a community restricted to damp, base poor soils that have not been 'improved' by modern farming. M23 often has species of nature conservation interest.

70. The community are concerned which flora the developers wish to pick and choose for removal for a proposed board-walk, which part of an irreplaceable habitat justifies this action? In the sandstone area in the clearing, do they propose to drill into the sandstone and damage it, which is part of the dry area on a path?



71. Picture restorable heath area in spring 2022 (above)



72. **Proposed 2m Boardwalk in Ancient Woodland Budletts Wood** - The current small path used by local walkers through Budletts Wood, is this the probable location of the proposed new boardwalk in a natural ancient woodland? The 2m boardwalk proposal will have to go over ancient woodland bluebells and other AW ground flora as in the picture above which also has areas of wild honeysuckle and primrose and in the Autumn many types of fungi in the AW along this path. The narrow path would have to be widened in Budletts Wood to accommodate the proposed 2m man-made structure (the recent Uckfield Bird in Eye appeal was dismissed and the dismissal included specific reference to widening a path in ancient woodland and adverse impact to the ground flora) If the proposed boardwalk is not in this the location, there are no other paths in this area of Budletts Wood – a quiet tranquil ancient woodland. This area is possibly one of the areas in the Uckfield Tourist Guide of the 1800s noted for its heathland.

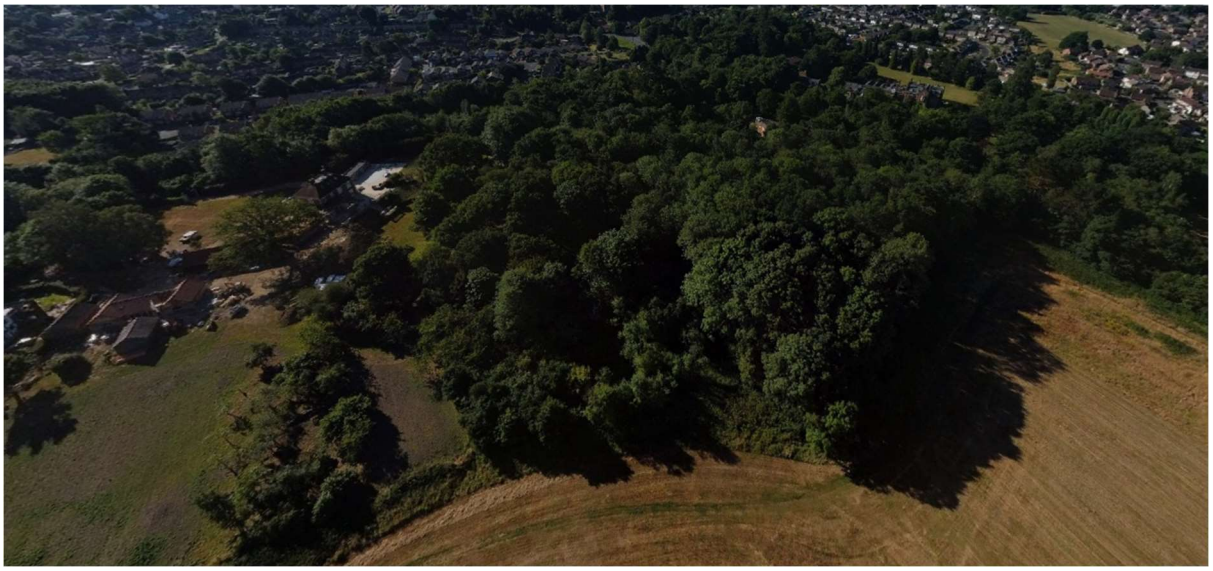


73. AW flora cow-wheat should be recorded as “Dominant” in the woodland surveys. Cow-Wheat in one part of Budletts Wood is very dominant in the mosaic of different types of AW. It is thought the new board-walk places a 2m width man-made structure in places over this fragile ancient woodland ground flora plant introducing loss and direct harm. The board walk is introducing harm to irreplaceable habitat only because of the developers proposed increased recreational visitors not because of the current gentle use.

74. Budletts Wood / Shermanreed Ghyll - Sussex Rare Devil's Fingers near the carriage drive and likely location of suggested boardwalk has not been accounted for with the 2m boardwalk for this ancient woodland fungi network. The iNaturalist pictures demonstrate a complex ecosystem including the fungi.



Fir Tree Grove



75. Area of other Gormanstan bat records (survey in evidence) including Barbastelle. No footpath access from the field side of Fir Tree Grove. The area within Fir Tree Grove has no lighting and joins Lake Wood. The developers ecology surveys seem lacking in the bat records at this part of the Downlands area.

Longwood Gill – ancient ghyll woodland

76. Due to the re-consultation, we are deeply concerned for the protection and conservation of Longwood Gill. Whilst this evidence may be in the inquiry, due to its significance we extracted the lower plant survey and other relevant species information , still missing protection within the re-consultation and exposed to irreversible damage with the updated plans.

77. [redacted]

78. [redacted]access their habitats if the area is dog proofed and important woodlands carved up with fencing?

79. Cat and (small) dogs are able to move under hawthorn and blackthorn buffer planting which will not prevent their access to the woodlands or Longwood Gill. In the Bird in Eye Inquiry, the developers suggested this planting prevented access to habitats.

80. Cat predation of hibernating dormouse and predation of a host of wildlife, mammals and birds within the gill habitat previously undisturbed.

81. In addition, the new SANGS has not reflected on the water flow changes to the lower plant survey of Longwood Gill from the previous application WD/2006/2855 likely to meet the criteria as a Local Wildlife Site and should be assessed and protected as such. Longwood Gill is very likely to meet International Significance based on the past surveys of Longwood Gill. Parts of Longwood Gill at its base are still proposed within the SANG and the Longwood Gill stream reaches up and over the carriage drive at times, and the ghylls stream continues through Thirty Acre Wood which is the base of the ghyll within the SANGS. The depth of the watercourse has not been assessed for the SANG in winter months. The new proposals fencing off all these connected woodlands will indirectly and directly bring harm.

Sports Pitch & Longwood Gill

82. A sports pitch was suggested in one of the maps, does this still apply? This was adjacent to Longwood Gill , could impact all the species within this response including the dormouse hedgerow to the GCN pond in the Woodland Copse on some plans, it is unclear if this remains within the plan , however, in the proof of evidence there is mention of sport play field provision.

83. We have not found an assessment for the impact a proposed sports pitch may include such as lighting , pitches and provision of parking is proposed for the sport pitch, and how that impacts Snatts Road and the bypass with other people and clubs using this, also having an impact on the species. However, this will create further light, noise and disturbance to a very quiet ghyll habitat and potential further impact if the sports pitch has surface and groundwater run-off, or if a 3G pitch is added which would introduce plastics to the natural environment.

84. Sports pitches normally have car parks. A SANGS car park will never provide enough parking for club sports. Therefore, where is the parking for the sports provision and what assessments have been provided for the increased impact to the environment and species within. It still remains inappropriate to add any car park in this environment, encase this ghyll on all sides by SANG, visitor impact, development, SuDS , Sewage treatment, dog and cat predation, recreation and sports fields.

85. The following is a cut and paste from WD/2006/2855 regarding Longwood Gill, likely of International Significance (Rose & Patmore, Ghylls) and the impact of the updated SANGS still has significant impact on this habitat fragmenting it with the SANG, housing and fencing. We apologise if in evidence, however, the lower plant survey of Longwood Gill has seemingly not been assessed for direct and indirect impact in the re-consultation and concerns had been voiced.

86. From WD/2006/2885 have they desk-based assessed their own previous survey? We could find no reference to the direct or indirect impacts to their former survey in the re-consultation.

LOWER PLANT SURVEY OF SANDROCKS AT LONGWOOD GILL, UCKFIELD, EAST SUSSEX

1.0 INTRODUCTION

1.1 Background

The following survey was carried for EPR by Neil Sanderson as a scoping survey to determine the level of lower plant interest on sandrocks within an ancient woodland gill. This was carried out as part of assessing the potential impact of development north east of Uckfield, East Sussex.

1.2 Survey

The site was visited by Neil Sanderson on the 2nd of December 2004 with Andy Cross and Gareth Knass of EPR. The survey was not a full lower plant survey. The survey concentrated on the rocks within the gill at Longwood Gill with the main aim of determining the quality of the lower plant flora in this habitat. Passing observations only were made on other habitats.

1.3 Rare Species and Indicator Species

1.3.1 Rarity

For bryophytes the definitions of Nationally Rare and Nationally Scarce species of follows the data in Hill *et al.* (1991, 1992 & 1994) as recommended on JNCC web site. This differs slightly from the lists in Hodgetts (1992) as the draft of Hill *et al.* (1994) used by Hodgetts (1992) differed from the published version. Red Data Book status is as listed in Church *et al.* (2001).

For lichens the definitions of Red Data Book status, Nationally Rare and Nationally Scarce and International Responsibility Species follows Woods & Coppins, (2003). International Responsibility Species are defined as follows:

- **International Responsibility Species**: this is a new category that recognises that some species are commoner in Britain than elsewhere. They are absent, rare or threatened in the rest of Europe and are thought, on existing data, to have 10% or more of their European or World population in Britain. These could be considered as more important than some Red Data Book species, which are common elsewhere in the world. The significance of these species depends on their actual British and local rarity but special attention needs to be paid to them in management.

1.3.2 Indicator Lists

Longwood Gill is likely to be an ancient woodland and thus the following list indicative of habitat quality was regarded to be of relevance to this site:

- **New Index of Ecological Continuity** (NIEC) (Rose, 1992 & Coppins & Coppins, 2002): Dr Francis Rose has devised an indicator list that can be used to assess the diversity and conservation value of woodland epiphytic lichen floras. This replaces an earlier more general indicator list the 'Relative Index of Ecological Continuity' (RIEC) Rose (1978). This list indicates habitat quality; the total number of species found is the

important parameter. The indicator species are associated with late succession stands with veteran trees (old growth stands i.e. stands more than 200 years old) (Alexander et al, 2002), especially those stands with a past continuity of old trees. Woods that have been clear felled, but regenerated, within the last 200 years (young growth stands) are therefore likely to be poorer in lichen indicator species than less disturbed stands. The lichen ancient woodland indicator lists are different from similar ancient woodland indicator lists composed of vascular plants or bryophytes. The latter reflect ancient sites rather than stands and are much less effected by the management of the trees. The NIEC ancient woodland indicator list consists of 70 species with Hodgetts (1992) regarding sites with 20 or more Ancient Woodland Indicators species as being of SSSI quality for their lichen flora. Sites with more than 30 such are likely to be of international significance. Such woods are likely to old growth stands with a strong continuity of veteran trees. Below this, as a rough guide, woods with 10 to 19 could be regarded as of county importance and those with 5 to 9 are of high local significance for their woodland lichen flora.

1.4 Nomenclature

The nomenclature follows Stace (1997) for vascular plants, Smith (2004) for mosses and Blockeel & Long (1998) for liverworts and Coppins (2002) for lichens.

Smith (2004) introduces some significant name changes, as did Blockeel & Long (1998); the changes for species recorded on this survey are listed below:

Older Name	New Name
Barbula fallax	Didymodon fallax
Eurhynchium praelongum	Kindbergia praelongum
Heterocladium heteropterum heteropterum	Heterocladium heteropterum
Rhynchostegium riparioides	Platyhypnidium riparioides
Polytrichum formosum	Polytrichastrum formosum
Isopterygium elegans	Pseudotaxiphyllum elegans
Scapania nemorosa	Scapania nemorea

New Name	Older Name
Didymodon fallax	Barbula fallax
Heterocladium heteropterum	Heterocladium heteropterum heteropterum
Kindbergia praelongum	Eurhynchium praelongum
Platyhypnidium riparioides	Rhynchostegium riparioides
Polytrichastrum formosum	Polytrichum formosum
Pseudotaxiphyllum elegans	Isopterygium elegans
Scapania nemorea	Scapania nemorosa

2.0 SURVEY

2.1 Species Recorded

2.1.1 Sandrocks

The species recorded from the sandrock exposures in Longwood Gill are given below in **Table 1.**

Table 1: *Species recorded from sandstone rock exposures in Longwood Gill*

SPECIES	ABUNDANCE (DAFOR)	COMMENT
Mosses		
Atrichum undulatum	O	Less acid rock, mature communities
Brachythecium rutabulum	O	Less acid rock
Dicranella heteromalla	F	On more acid drier rocks
Didymodon fallax	O	On less acidic damp rocks
Fissidens adianthoides	F	Less acidic wet rock
Fissidens pusillus	F	Wet rock
Fissidens taxifolius	O	Damp less acidic rock
Heterocladium heteropterum	O	On less acidic damp rocks
Hookeria lucens	R	Damp rock
Hypnum andoi	O	On more acid drier rocks
Isothecium myosuroides	F	On more acid drier rocks
Kindbergia praelongum	A	On less acidic wet rocks
Mnium hornum	A	Shaded rock with mature communities
Plagiomnium undulatum	O	Damp less acidic rock
Platyhypnidium riparioides	O	On rocks where streams flow over them
Polytrichastrum formosum	R	Humus on more acid drier rocks
Pseudotaxiphyllum elegans	F	Drier more acidic acid rocks
Rhizomnium punctatum	F	Damp less acidic rocks
Tetraphis pellucida	O	Dominant on damp acid rock in upper gill
Thamnobryum alopecurum	F	Dominant in mature communities on base rich damp rock
Thuidium tamariscinum	R	Humus on damp rock
Trichostomum brachydontium	F	Overhanging areas of more base rich rock

SPECIES	ABUNDANCE	COMMENT
Liverworts		
Calypogeia fissa	O	Damp rock
Cephalozia bicuspidata	O	Damp acid rock in early succession communities
Cephalozia lunulifolia	R	Damp acid rock in early succession communities
Diplophyllum albicans	A	On more acidic rocks
Jungermannia pumila	O	Patches on damp rocks in open communities
Lepidozia reptans	R	Acid rock at head of gill
Lophocolea bidentata	R	Damp rock
Lophocolea heterophylla	O	Damp rock
Pellia endiviifolia	O	More base rich damp rocks & soil
Pellia epiphylla	R	Damp rock
Plagiochila asplenioides	O	Mature communities on damp rock
Scapania nemorea	R	Rocks on SW at bottom end
Lichens		
Cladonia sp.	O	Sterile Cladonia
Lepraria incana	O	Dry rock overhanging
Lepraria lobificans	O	Damp rock
Micarea prasina	O	Damp acid rock
Porpidia crustulata	R	Damp rock
Trapelia coarctata	R	Damp rock
Verrucaria hydrela	R	Flushed sandrock

No. of species recorded:
Mosses 22
Liverworts 12
Lichens 7
Total No. of species recorded 41

A total of 41 taxa were recorded, of which 22 were mosses, 12 liverworts and 7 lichens. None were Nationally Rare or Scarce but several are of regional or county significance and these latter species are described in section **3.0**.

2.1.2 Lichen species noted on trees

The epiphytic lichen flora in most of the woods appears to be of little note but a two species of interest were noted on passing:

Schismatomma quercicola: an International Responsibility and NIEC Ancient Woodland Indicator was recorded from an old multi-stemmed Oak at the head of the gill. It was growing on acid bark.

Chaenotheca brunneola: a NIEC Ancient Woodland Indicator recorded from lignum on two standing dead trees just outside Longwood Gill, at about TQ467 227 and TQ468 228.

2.2 Lower plant communities of the Longwood Gill sandstones

The sandrocks within Longwood Gill vary in their pH values and moisture regime and, through this diversity, support several distinct lower plant communities. A significant feature of the rocks in this Gill is that most of the rocks are mildly base rich, a quite unusual feature for the Sussex sandrocks. Acid sandstone does occur in the Gill but only in the upper section of the Gill. In addition to the pH range, there are moisture differences imposed by the local hydrology giving a range of habitats from rocks within seasonal streams, through wet rock with seepages flowing over the surface and damp rock effected by seepage from within, to dry rocks.

Seasonal streams: small seasonal side streams of surface water flow into the gill and over the rocks locally. These support amphibious moss communities with *Platyhypnidium riparioides* dominant. The base demanding liverwort *Pellia endiviifolia* occurs on the edges of some of these seasonal waterfalls.

Damp to wet mildly base rich rock: the dominant rocks in the gill are less acidic than is normal for sandrocks and are flushed by ground water seepages through and over the rocks. Mature bryophyte communities are dominated by *Thamnobryum alopecurum* (dampest and most base rich rocks), *Kindbergia praelongum* and *Mnium hornum* (drier and more acidic). Associated species include *Atrichum undulatum*, *Brachythecium rutabulum*, *Fissidens adianthoides*, *Fissidens taxifolius*, *Plagiochila asplenioides*, *Plagiomnium undulatum* and *Rhizomnium punctatum*. Where the mature community has off has peeled of the wet rock the bare rock colonised by the small pioneer species *Jungermannia pumila* and *Fissidens pusillus*. On one rock the aquatic lichen *Verrucaria hydrela* was recorded in a seepage. Maturing but open communities include the mosses *Didymodon fallax*, *Heterocladium heteropterum* and *Trichostomum brachydontium*. The lichen *Lepraria lobificans* locally over grows the mosses.

Dry mildly base rich rock: Slightly overhanging area of mildly base rich sandstone are dominated by cushions of *Trichostomum brachydontium*.

Very dry acid rock: over hanging areas of dry acid sandrock are dominated by the lichen *Lepraria incana* and little else

Moister acid rock: in the upper section of the gill there area extensive exposures fairly dry acid rocks appear on the north east side. There area smaller acid outcrops elsewhere. These have abundant *Pseudotaxiphyllum elegans*, *Dicranella heteromalla*, *Diplophyllum albicans* and *Isothecium myosuroides*, with associated species including *Hypnum andoi* and *Polytrichastrum formosum*. Early succession species found in peeling areas include the liverworts *Cephalozia*

bicuspidata, *Cephalozia lunulifolia*, *Lepidozia reptans* and *Scapania nemorea* and the lichen *Micarea prasina*.

Wet acid rock: the largest outcrop in the upper gill has some steep acid sandrock kept damp by constant seepage through the rock. This is dominated by *Tetraphis pellucida*, the late succession dominant of the classic species rich acid sandrocks (Jackson & Rich, 1996). At present there is no peeling and sloughing off of the mature moss community, which is needed to provide habitat for pioneer communities. Furthermore, the outcrop is rather deeply shaded.

3.0 DISCUSSION

3.1 The Value of the Wealden Gill Sandrocks

The gills and the associated sandrocks of the Weald support assemblages of upland and oceanic bryophytes that are unique in lowland Europe and, consequently, are recognised as being of international significance for bryophytes (Hodgetts, 1996).

3.2 Significance of the sandrocks in Longwood Gill

3.2.1 Flora

Bryophytes

The gill does support two typical gill specialist bryophytes:

Heterocladium heteropterum

This moss is a widespread species in the western uplands in acidic to mildly basic rocks in deeply shaded and humid sites, normally in woodlands or ravines (Hill *et al.*, 1994). In lowland England it is confined to the Weald, where it is found on shaded rocks, often near streams (Rose *et al.*, 1991). Within the Weald, *Heterocladium heteropterum* has a localised distribution with only 20 tetrad records from East Sussex (Rose *et al.*, 1991). It has not been recorded from the tetrad containing Longwood Gill. Here it was found in open patches in the damp to wet mildly base rich rock community in several places.

Jungermannia pumila

This liverwort is a widespread species in the western uplands in moist places on boulders and rock outcrops in wooded or sheltered conditions, by streams and in gullies typically on base poor to moderately base rich substrates (Hill *et al.*, 1991). In lowland England it is confined to the Weald, where it is found on wet acid rocks by streams and water falls (Rose *et al.*, 1991).

Jungermannia pumila is local in the East Sussex High Weald, with Rose *et al.* (1991) recording from in 23 tetrads but not from the tetrad containing Longwood Gill. At Longwood Gill, *Jungermannia pumila* was a prominent pioneer species colonising areas where mature lower plant vegetation of the damp to wet mildly base rich rock community had peeled off exposing the rock surface.

Also of interest at Longwood Gill is the abundance of *Trichostomum brachydontium* on dry, mildly base rich overhangs. This is a species with a predominantly coastal and western

distribution in Britain and is uncommon in the lowlands. Within East Sussex it occurs only occasionally and is mainly on the Downs. In the Weald *Trichostomum brachydontium* appears to be very rare in the inland sandrock gills and has only been recorded from the coastal gills near Hastings. Rose *et al.* (1991) describe it as occurring in Marline Wood on basic rock outcrops, a similar habitat to that at Longwood Gill. That *Trichostomum brachydontium* occurs on such substrates implies that it an unusual species for the gills, where mildly base rich sandrocks are uncommon.

The record for *Trichostomum brachydontium* at Longwood Gill is a new one for this area of the High Weald in East Sussex.

In addition to the above species, the widespread High Weald oceanic species *Hookeria lucens* was also recorded within the gill.

Lichens

One lichen species appears to be new for Sussex:

Verrucaria hydrela

This is an aquatic crust forming lichen that is widespread on rock in acid upland streams but is rarely recorded from the lowlands. It has stronghold in the New Forest, where it occurs in flints in shallow streams and springs within ancient woodlands (Gilbert & Giavarini, 1997). It has not previously been recorded from Sussex, and this record from Longwood Gill is the eastern most British record for the species. At Longwood Gill it was found on rock both free of bryophytes and irrigated by a seepage.

Although the epiphytic lichen flora does not look to be rich overall, the Ancient Woodland indicator lichen *Schismatomma quercicola* was recorded from an Oak in Longwood Gill. *Schismatomma quercicola* is an uncommon species in East Sussex with Rose *et al.* (1991) recording it from 7 tetrads though did not record it from the tetrad containing this Longwood Gill.

3.2.2 Vegetation

The predominant vegetation of the rocks in the gill indicates wetter and rather more base rich conditions than is typical of sandrock exposures. As a result the assemblages on many of the rocks is that more normally found on steam side rocks within the gills (Jackson & Rich, 1996). Only in the upper gill do massive acid and damp sandrocks outcrop with late succession stands dominated by *Tetraphis pellucida*. This is the richest habitat in specialist oceanic bryophytes on the sandrocks (Jackson & Rich, 1996), where early succession stands occur. The exposures here, however, are deeply shaded and this habitat is not well developed at present.

3.2.3 Conservation Significance

Longwood Gill is clearly not as rich and diverse as the most important and larger SSSI gills of the Weald (Rose *et al.*, 1991) but it is clearly of county wildlife site quality. It probably also makes a significant contribution to the network of gills and sandrocks that gives the High Weald its international importance for lower plants.

WD/2006/2855 references Longwood Gill “It probably also makes a significant contribution to the networks of gills and sandrock that gives the High Weald its international importance for lower plants” This still has not been adequately addressed in the re-consultation and fencing it off is not adequate for such an important feature.

Further intensive survey would be likely identify more lower plant interest within the gill, but is unlikely to change this assessment.

3.2.4 Development Issues

The following issues have the potential to produce negative impacts on the conservation interest of the gill:

Hydrology: the rocks are affected by both surface and ground water flows and these are critical in creating habitat diversity for lower plants on the rocks and maintaining humidity within the gill.

Fragility of the rocks and heath and safety: the rock outcrops are likely to be both very attractive and dangerous to children. There is a risk of both damage to the rocks and their thin coating of bryophytes and to the children themselves.

Rubbish dumping: there is a danger of rubbish dumping into the gill. Garden rubbish is both the most likely material and a particular threat, with vigorous invasive exotics often forming a significant component of garden rubbish.

Past woodland clearance: the ancient woodland above the gill has been cleared for agriculture. Replacing it with a buffer of new woodland would be beneficial, whether the area is developed or not, but development could be a mechanism to achieve this.

Management: the coppicing or pollarding of trees and bushes, especially Holly shading some of the rocks would be beneficial. This would be desirable, whether the area is developed or not, but development could be a mechanism to achieve management.

4.0 REFERENCES

Alexander, K.N.A., Smith, M., Stiven & Sanderson, N. A. (2002) *English Nature research Reports No 494. defining 'old Growth' in the UK Context.* English Nature, Peterborough.

Blockeel, T. L. & Long D. G. (1998) *A Check List and Census Catalogue of British and Irish Bryophytes.* British Bryological Society, Cardiff.

Coppins A. M. & Coppins, B. J. (2002) *Indices of Ecological Continuity for Woodland Epiphytic Lichen Habitats in the British Isles.* British Lichen Society, London.

Coppins, B. J. (2002) *Checklist of Lichen of Great Britain and Ireland.* British Lichen Society, London.

Church, J. M., Hodgetts, N. G., Preston, C. D., & Stewart, N. F. (2001) *Red Data Books of Britain and Ireland: Mosses and Liverworts.* , Peterborough: JNCC.

Gilbert, O. L. & Giavarini, V. J. (1997) The lichen vegetation of acid watercourses in England. *Lichenologist* **29**: 347-367.

Jackson, A. & Rich, T. C. G., (1997) Lower plant communities of the Wealden sandrocks at Wakehurst and Chiddingfye Woods SSSI, SE England. In: *Conservation of Cryptograms in the Weald* (ed. A J Jackson & M Flanagan) 27-31.

Hodgetts, N. G. (1997) A national and international context for the cryptograms in the Weald with reference to current and future conservation initiatives for UK cryptograms. In: *Conservation of Cryptograms in the Weald* (ed. A J Jackson & M Flanagan) 1-18.

Hill, M. O., Preston, C. D. & Smith, A. J. E. (1991) *Atlas of the Bryophytes of Britain and Ireland Volume 1 Liverworts.* Colchester: Harley Books.

Hill, M. O., Preston, C. D. & Smith, A. J. E. (1992) *Atlas of the Bryophytes of Britain and Ireland Volume 2 Mosses.* Colchester: Harley Books.

Hill, M. O., Preston, C. D. & Smith, A. J. E. (1994) *Atlas of the Bryophytes of Britain and Ireland Volume 3 Mosses.* Colchester: Harley Books.

Hodgetts, N. G. (1992) *Guidelines for Selection of Biological SSSIs: Non-Vascular Plants.* Peterborough: JNCC.

Rose, F. (1976) Lichenological indicators of age and environmental continuity in woodlands. In: *Lichenology: Progress and Problems* (eds: D H Brown, D L Hawksworth & R H Bailey) 279-307

Rose, F. (1992) Temperate forest management: its effects on bryophytes and lichen floras and habitats. In: *Bryophytes and Lichens in a Changing Environment.* (eds: J W Bates & A M Farmer) 211-233. Oxford: Oxford University Press.

Rose, F., Stern, R. C., Matcham, H. W. and Coppins, B. J. (1991) Atlas of Sussex Mosses, Liverworts and Lichens. Brighton: The Booth Museum of Natural History

Smith, A. J. E. (2004) *The Moss Flora of Britain and Ireland, Second Edition.* Cambridge: Cambridge University Press.

Stace, C. (1997) *New Flora of the British Isles. Second Edition.* Cambridge: Cambridge University Press.

Woods, R. G. & Coppins, B. J. (2003) A *Conservation Evaluation of Lichens.* London: British Lichen Society.

Paygate Wood- Parkland Oaks between Paygate Wood and Sherman Reed woodlands

87. In the SANGS re-consultation we were unable to find an assessment for these stands of oak trees off Snatts Road near the proposed car park, or an assessment of the required connectivity between Paygate Wood ancient woodland to Shermanreed ghyll.

88. Is there an assessment if this may identify as “Parkland” criteria and may engage an ancient woodland protection area?.

89. Landscape setting - the SANGS car park in this important landscape harms the woodlands heritage rural character and appearance of the woodland and oak parkland.

90. Engineering the SANGS adjacent to Paygate Wood introduces change and harm to another ancient woodland. It is unclear from the maps what buffers are proposed without engineering impact adjacent to Paygate Wood which is currently a quietly used settled footpath. The area is a recorded priority habitat which was previously woodland shown on all the older maps, the field shows itself full of naturally regenerating oak saplings.

91. Additionally, of concern is the proposed SANGS car park impact to the landscape setting of Paygate Wood with a tarmac carpark in its woodland setting and any direct/indirect impact.

92. Woodland species - The understorey of the oak trees is now supporting wildlife and restoring the woodland connectivity. What assessments have been included for birds, amphibians, reptiles and if it is now used by the arboreal hazel dormouse within the bramble and blackberries connected to the woodlands known to support dormouse and Barbastelle bats.



93. Aerial of oak stands and oak understorey off Snatts Road, understorey connects woodlands Paygate to Shermanreed with naturally regenerating oak saplings and bramble.



94. Aerial of ancient woodland Paygate Wood connected through oak stands and naturally regenerating woodland of oak / bramble understorey to Shermanreed ancient woodland ghyll, a natural landscape free from manmade structures and SANGS engineering.

95. Thirty Acre Wood

96. Thirty Acre Wood will be fragmented, isolated and enclosed on all sides, the canopy will be fragmented and the re-consultation has not addressed this. Removing functional connectivity to its landscape setting while Thirty Acre Wood has a thriving hazel dormouse and thriving bat population both of which rely heavily on the connectivity of Thirty Acre Wood to Lake Wood and to Budletts Wood and Longwood Gill etc.

97. The re-consultation has cycling and hard surfaces within Thirty Acre ancient woodland and likely removes the connected canopy. It is unclear in the mass of paperwork if the proposed bus access is still here as it was in early design and what visibility splays are removed in the redesign, and roots impacted by compaction with the proposed road surfaces and how that impacts the updated designs.

98. The “hazel dormouse maps” from the last application WD/2006/2855 and this application WD/2022/1637 clearly demonstrate that the connectivity for an arboreal mammal is well established. The updates still fragment ancient Woodland in two places contrary to all standing advice and best practices of avoiding harm to connections between ancient woodland and endangered populations within the woodlands. The current scheme appears to offer “dropped kerbs” for the dormouse – completely at odds with the arboreal nature of the dormouse using a connecting canopy.



99. Picture of the connected woodland canopy between Thirty Acre Wood and Budletts Wood – proposed cycle and emergency access in the woodland RPA and branches cut back for access will disturb the woodland canopy needed by the hazel dormouse (purple beech tree is the area of change proposed in ancient woodland) (does this area still have access for the bus?)



100. Aerial picture of the connected ancient woodlands between Lake Wood, Thirty Acre Wood and Budletts Wood

101. The map evidence demonstrates that this Copse area has had woodland for hundreds of years. The aerial image above the Copse demonstrates it is woodland missing from the updated records removing its Ancient Woodland status, the re-consultation has not addressed concerns about this woodland habitat with priority ponds, great crested newt, hazel dormouse impacts.



102. Screenshot taken above the Copse and shows the similarities between Woodlands from aerial drone video in evidence
https://www.skypixel.com/photo360s/my-product-468db423-88e8-4c61-99bb-143eb0964bfe (courtesy of Kit Wilson with approval to use / share)