Our ref: 1005719/MRD/AB/014 let consult

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25 November 2022

Richard Cobb
Susses and Kent Area Team
Natural England
Customer Services
Hornbeam House
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Electra Way
Crewe
Cheshire
CW1 6GJ

Sent By E-Mail Only

Dear Mr Cobb,

Land at Downlands Farm, East Sussex

Aspect Ecology is advising the applicant in respect of ecological matters at the above site. We have been passed a copy of Natural England's consultation response dated 27 September 2022. The purpose of this correspondence is to address the queries raised.

As you note that the applicant sought to engage with Natural England pre-application under the discretionary advice service (DAS) but unfortunately Natural England was unable to do so due to resourcing issues. The DAS approach works very well with your Natural England colleagues in the other regions e.g. Thames Region, and it allows them to gain a first hand impression of the SANG at the outset which informs all subsequent comments from Natural England. We believe if you were able to now take up our offer of a site visit at this stage, this would enable a more constructive dialogue as many of the points or queries raised in Natural England's consultation response would become self-evident from a site visit. Therefore, please do let us know when you would be available to meet and we would be pleased to show you around the proposed SANG.

In the meantime, we set out below responses to the queries Natural England raise as far as is possible without the benefit of your site visit. These are grouped under the same headings as used in the Natural England correspondence:

Ancient woodland

1. "*While it can sometimes be acceptable for Ancient Woodland to be used as part of a SANG (e.g. where this is sensitively managed and ecological surveys don't pose any particular concerns), this SANG does appear to rely on a significant amount of ancient woodland that surrounds much of the site with the circular footpath cutting through it at multiple points. This will need careful consideration to ensure that increased visitors will not adversely affect this irreplaceable habitat".*

Reference to Natural England's document 'Guidelines for Creation of Suitable Alternative Natural Greenspace (SANG) – August 2021' finds that *"Surveys clearly show that woodland or a semi-wooded landscape is a key feature that people appreciate in the sites they visit, particularly those who use the SPA. This is more attractive than open landscapes or parkland with scattered trees"*. Accordingly, the woodland habitat is well suited to SANG but in terms of the Downlands site this only forms a

component of the SANG, with much of it formed by other habitats. The application has placed ancient woodland considerations at its heart and accordingly much attention has been directed to defining the characteristics and sensitivity of the woodland. A summary of this analysis can be found within the ES at chapter 7 Biodiversity paragraphs 7.194 – 6 which is informed by the data in the Baseline Ecological Appraisal e.g. at its Annex 4 Woodland Botanical survey. This work has identified that the woodland areas of increased sensitivity are Longwood Gill and part of Shermanreed Gill. In response to these findings, these areas have been excluded from the SANG design - see Plan 5719/SMP2 within the SANG and Woodland Management Plan. Reference to this plan and Plan 6170 D016 Rev. D: SANG Detailed Hard and Soft Landscaping Design within the SANG and Woodland Management Plan also shows that in a number of locations paths will be fenced to deter use of the woodlands by SANG users. As such, Natural England can be assured that careful consideration has been given to SANG design so as to ensure that increased visitors will not adversely affect this irreplaceable habitat.

2. *"The application evidence suggests that part of the circular route includes informal paths that are already used (Plan 5719/SMP3). However, it is unclear how extensively these are used and whether increased visitors would cause significant negative impacts on the site, so this needs to be investigated further"*.

We would direct you to paragraph 7.270 of the ES which describes the current visitor use of the woodland. In summary, the use is very light and hence the paths have good capacity to receive visitors, with this not diminished by the low level of existing use. This can be readily observed from a site visit.

3. *"EDP Plan 6170 D016 Rev. D shows that the proposed circular route includes new pathways that would encourage visitors to venture further into the ancient woodland that have not been identified as current informal pathways in Plan 5719/SMP3"*

It is common practice for SANG creation to be accompanied by new pathway creation. The purpose of providing new paths in this case is so as to further increase the attractiveness of the path network and in turn SANG to visitors. We would be pleased to review individual path locations during a site visit and would welcome comments by Natural England on any siting adjustments which are felt to be desirable.

Nature Conservation Value

4. *"The survey evidence suggests that in addition to the ancient woodland, there are valuable habitats and species present on site including priority habitat and protected species"*.

We would be grateful to learn as to which habitats / species Natural England is particularly referring to of relevance to SANG.

Circular route

5. *"It is difficult to assess the suitability of the circular route without visiting the site …..while the drawings suggest the length is acceptable, it does look contrived in some places …and ….there is a risk that visitors will cut across the middle. This might be helped by introducing more focal points…..While unsurfaced footpaths are preferred for their semi-natural feel, consideration needs to be made to ensure that they are usable throughout the whole year ….. This is particularly relevant for routes that cross or are near to water-courses/ponds, which may require boardwalks"*.

Natural England's observations are welcomed and the applicant has confirmed that they would be pleased to detail the use of focal points and boardwalks in key locations to assist with directing SANG users as effectively as possible. These exact locations of these would be most appropriately discussed during a sit visit.

Community orchard

6. *"While the principle of connecting multiple green spaces together as part of a broader network is welcome, the inclusion of the orchard within the SANG proposals needs to ensure that it is designed in a way that complements the semi-natural features that promote a 'wild' feel required for delivering an effective SANG. For example through non-linear planting and by combining with interspersed wildflower meadows"*.

Reference to the SANG Design Guidelines suggests SANG should have *"a semi-natural looking landscape with plenty of variation"*. The proposed orchard within the SANG would provide such desirable variation. Similarly, the design philosophy for the orchard is that this would be 'traditional in nature'. The Priority Habitat description[1] for Traditional Orchards describes these as *"….Traditional orchards are structurally and ecologically similar to wood-pasture and parkland…"* and accordingly this habitat would represent a further component of interest in the SANG. The applicant is amenable to further increasing the 'wild' feel as suggested by the introduction of more non-linear planting and glades along its margins with pathways or throughout. We would be pleased to discuss this during the site visit.

Other comments

7. *"The application is proposing to discount capacity of 10% on the grounds of existing, informal public access but it is not clear what the justification is for this figure"*.

We would refer Natural England to paragraph 7.270 of the ES. This discussion sets out that there is only a relatively low level of current use by the public. As such, it is considered that no discounting of SANG capacity is required, but nonetheless to take a precautionary approach, a 10% discount has been applied to capacity. In any event, it is highlighted that the capacity of the SANG significantly exceeds that required by the proposed number of residential units (no. 424 units with a SANG capacity of 848 units provided for even following the precautionary discount).

Lastly, we note that Natural England highlight that other ecological and landscape issues are also present and these are matters for the local planning authority to consider and address.

I trust the above clarification is of assistance. We would be grateful to learn as to Natural England's availability to meet on site which is the next step.

Yours sincerely

[redacted]

Alistair Baxter

([redacted])

[1] UK Biodiversity Action Plan; Priority Habitat Descriptions. BRIG (ed. Ant Maddock) 2008. (Updated 2011)