From: [redacted]
Sent: 27 January 2023 17:16
To: [redacted]r
Cc: [redacted]
Subject: WD/2022/0648/MAO Land at Mockbeggars Farm, Uckfield, TN22 2EA

Categories: Consultee

Dear Planning Officer,

Please find below ecology consultation for this application:

Biodiversity Net-gain and Ecological Mitigation/Enhancement
The directly affected areas of the site consist of what has been identified as semi-improved grassland (survey visits in May and Nov 21), which corresponds with the floristic species information provided. Two hedgerow (H2 & H4) are proposed to be severed to accommodate access road to proposed development in the north-eastern field; hedgerow planting is proposed along the eastern boundary of the site which flanks existing tree line.

Ecological mitigation/enhancement and biodiversity net-gain measures are provided. This includes new hedgerow planting, use of native local provenance species in planting scheme, grassland enhancement and developing species-rich meadow habitat, native planting within SUDS, bird, bat and hedgehog boxes, bee bricks, habitat piles and incorporation of nectar rich planting.

The landscape strategy plan, whilst not final, includes use of native species and the Council would expect to see a high proportion of native and locally distinctive species incorporated into a reserved matters application, without use of invasive non-native species. Retention of more valuable BNG habitats are proposed and with the ecological enhancement/mitigation and BNG features proposed, it is reasoned the development should be capable of BNG provision onsite, as per current local and national policy.

Ecological Connectivity and Local Ecological Network
The site is located within a local ecological network of large ancient woodlands inter-dispersed with smaller parcels of ancient woodland, priority habitat deciduous woodland, fields, hedges, tree lines and scattered and linear development the periphery of Ringles Cross and Budlett's Common. The site itself provides semi-natural connectivity between these habitats and is constrained by development on north, south and east sides. The site currently provides connectivity in the landscape between large areas of semi-natural and irreplaceable habitat Paygate/Budlett's Wood, Budletts Common to the west (which in turn leads on to Shortbridge Stream and Lake wood LWS) and View's Wood and Buxted Park SSSI to the east. The proposed development fragments north-south hedgerow H4 with proposed access road. There is a likelihood the proposed built form at the southern end of the site will segregate current connectivity to the wider local ecological network for species including bat species, European protected species. An annotated plan has been provided below. Similar concerns relating to fragmentation of the local ecological network have been raised with a number of other planning applications within the locality. The bat species recorded onsite are noted and the presence of numerous 'big bat' and barbastelle species records at locations consistent to suggest commuting across part of the habitat onsite due to be severed by development (see Bats, European Protected Species section below).



Annotated MAGIC map plan showing ecological connectivity for species, including bats, within the local ecological network. Red arrow and dotted orange arrow depicts severing/obstructing and partial severing of habitat connection proposed by development. Ancient woodland – brown stripped, priority habitat – solid green, SSSI - solid lime green 1, 2.

Bats, European Protected Species

Bats, European protected species, have been recorded utilising the site as part of the bat activity surveys undertaken to support the application. It is noted that the survey/survey data does not include the May-June period due to timing of surveys , rain at the end of June survey and failed static bat detector 29th June - 5th July. The survey confirms high bat activity within the site and confirms use of the site by a number of light avoiding species including, myotis, brown-long-eared and barbastelle; the latter of which is an annex IV species of the European Habitats Directive (Animal and plant species of Community interest i.e. endangered, vulnerable, rare or endemic in the European Community, in need of strict protection), a rare bat that forages/commutes over a large area.

Fragmentation impacts upon bat use of the site have been identified in the submitted ecological report and include high levels of activity recorded in the vicinity of the central hedgerow. The report states the access road will fragment the central hedgerow. It also states the western boundary hedgerow will be fragmented through access from London Road. Mitigation is proposed through hedgerow creation on site boundaries however there appears likelihood that the application in its current form would displace bat foraging and commuting from within the site and sever east-west bat connectivity across the site and beyond (as described in the ecological connectivity and local ecological network section above). The site is already bounded in part by existing development on its south, north and east sides and relatively narrow areas of peripheral planting would not, it is recommended, be effective mitigation for light avoiding bat species; forcing them towards existing development and associated lighting may lead to abandonment of use of the site and barriers to use of the wider ecological network. It is noted the current degraded state of Round Wood, the AW directly adjoining the site, which may already be impacting existing bat foraging and commuting areas. Barbastelle and other bat species identified in the bat survey work would also be feeding over and upon biomass produced from onsite habitat proposed to be lost.

The Bat Conservation Trust Bats and Artificial Lighting in the UK 2018 document states: “When considering how bats move through the landscape, artificial lighting has been shown to be particularly harmful if used along river corridors, near woodland edges and near hedgerows. In mainland Europe, in areas where there are foraging or ‘commuting’ bats, stretches of road are left unlit or lighting is designed in such a way as to avoid bat colonies being cut off from their foraging grounds. Studies have shown that continuous lighting in the landscape, such as along roads or waterways, creates barriers which many bat species cannot cross, especially the slower-flying species (Fure, A. 2012), even at very low light levels”. And: “It is noticeable that most of Britain’s rarest bats are among those species listed as avoiding artificial light, so artificial lighting has potentially devastating conservation consequences for these species (Rowse et al 2016)”. The annotated landscape strategy plan below shows proposed boundary mitigation areas not deemed suitable for light avoiding bat species and not retaining sufficient connectivity of the wider local ecological network:



Protected Species
Suitable precautionary methodology has been provided for protected species: badgers, hazel dormice, hedgehogs, herptiles, nesting birds.

Budlett's Common Rocks Local Wildlife Site

The development is proposed approximately 50 metres from local wildlife site CW80 Budlett's Common Rocks which is designated largely for its lower plant flora associated with sand rock. Impacts from the development upon the LWS are not anticipated.

Priority Habitat and Ancient Woodland, Irreplaceable Habitat
Recognised priority habitat is located to the southeast of the site and along part of the site's north boundary. The woodland to bordering the central/south-east of the site is also recognised ancient woodland (AW), irreplaceable habitat. The ecological report states a 15 metre buffer zone, or greater, will be provided from development to AW. The submitted landscape strategy plan includes what is depicted as semi-natural habitat between development and AW. Tree and woodland protection measures are recommended in the ecological appraisal. The ancient woodland buffer would need to function as such buffering AW from impacts of development, including light, noise and pet predation. Therefore it would need to include sufficient tree and shrub species to provide physical buffer to achieve this function.

Recommendation
Ecological objection: Impact on local ecological network and European protected species. Ref:

- National Planning Policy Framework 2021 sections 174 & 175. Establishing coherent ecological networks that are more resilient to current and future pressures; maintaining and enhancing networks of habitats and green infrastructure.
- Wealden District Core Strategy Local Plan (2013) Policy WCS12 Biodiversity. Ensure a comprehensive network of habitats, and work with partners to maximise opportunities to ensure habitats, biodiversity features and ecological networks are maintained, restored, enhanced and where possible created to achieve a net gain in biodiversity and sustain wildlife in both rural and urban areas.
- Wealden District Core Strategy Local Plan (2013) Policy WCS13 Green Infrastructure. The District's existing network of green infrastructure will be protected, improved and enhanced by the implementation of a Green Infrastructure Strategy, ensuring a multifunctional, accessible network which maintains and improves biodiversity and landscape character, increases opportunities for healthy living and contributes to healthy ecosystems and climate change objectives. Development proposals will not be permitted which would result in the loss of existing open space or harm to Wealden's network of green spaces unless measures are incorporated within the development that will either mitigate the effects of development.
- Wealden District Local Plan 1998 Saved Policy EN14. Landscaping within developments In appropriate cases, the Council will require landscaping, including surface treatments, to be carried out as part of development proposals. Where required, such schemes should:- (1) seek to retain existing trees, significant hedgerows and other valuable site features; (4) have regard to associated nature conservation benefits;

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