



Land at Bird in Eye Farm,
South of Bird in Eye Hill,
Uckfield

SANG Design and Framework Management Plan

Prepared by
CSA Environmental

on behalf of
Croudace Homes Limited and
Mr and Mrs Berry

Report No: CSA/2646/05

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This report may contain sensitive ecological information. It is the responsibility of the Local Authority to determine if this should be made publicly available.

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1.0 INTRODUCTION

- 1.1 The following Suitable Alternative Natural Greenspace (SANG) Design and Framework Management Plan has been drawn up by CSA Environmental on behalf of Croudace Homes Limited and Mr and Mrs Berry. It summarises the proposed approach to the creation of a bespoke strategic Suitable Alternative Natural Greenspace ('SANG') to mitigate the potential recreational impacts of the proposed residential development at Land at Bird in Eye Farm, South of Bird in Eye Hill, Uckfield on the Ashdown Forest Special Protection Area (SPA).
- 1.2 The purpose of this document is to describe the key objectives of the proposed strategic SANG and its delivery. Prescriptions are provided to guide future management for the benefit of biodiversity, as well as to establish the area as an important recreational resource for residents of the new development and the wider community. Details of habitat and visitor access enhancement measures and a clear management and monitoring schedule are provided herein.
- 1.3 This report has regard to the ecological and landscape features present within the proposed SANG area (hereafter 'the Site') and those new features that will be created as part of the future SANG development.
- 1.4 General management considerations (Section 4) have been formulated to inform and underpin the detailed management prescriptions contained in Section 5.
- 1.5 A Landscape Strategy and SANG Design Plan (CSA/2646/114/L) has been produced (Appendix B); which sets out the over-arching landscape principles of the SANG and should inform any detailed proposals produced subsequently to enable the final setting-out and installation of the SANG. It is anticipated that any such details will be secured by way of planning condition.

Purpose and Policy Context

- 1.6 Residential development of up to 290 units is proposed at Land at Bird in Eye Farm, South of Bird in Eye Hill, Uckfield. The proposed development is located approximately 5.4km from the Ashdown Forest Special Protection Area (SPA) at its closest points. The Ashdown Forest SPA and Special Area of Conservation (SAC) is a forest containing one of the largest single continuous blocks of lowland heath in south-east England, which are designated under the European Birds Directive and the Habitats Directive and protected in the UK under the Habitats Regulations. The SPA provides a habitat for the internationally important bird species of nightjar *Caprimulgus europaeus* and Dartford warbler *Sylvia undata*. These birds are particularly subject to disturbance from walkers, dog walkers and cat predation because they nest on or near the ground.

- 1.7 Development within 7km of the SPA (Zone of Influence) is required to provide mitigation in order to avoid increased visitor pressure on this protected resource. Policy WCS12 of the Adopted Wealden Core Strategy (2013) and Policy EA2 of the withdrawn Wealden Local Plan (2019) in addition to the Strategic Access Management and Monitoring Strategy set out the requirements for mitigation measures. These include the provision of Suitable Alternative Natural Greenspace (SANG) to absorb additional recreation pressure from new net development and prevent increasing impacts on the SPA. New development is also required to make financial contributions towards SAMM (Strategic Access Management and Monitoring) to be used to fund bird and visitor monitoring and the effectiveness of mitigation measures at the SPA.
- 1.8 Wealden District Council states that where bespoke SANGs are being considered, developers should seek to provide areas of SANG on-site in the first instance, i.e. co-located with the proposed development. The land for such a bespoke SANG must be enhanced to SANG standard through in-kind works by the developers as established and secured with a s106 Agreement.

SANG Capacity and Catchment

- 1.9 In the case of land at Bird in Eye Farm, the proposals will provide mitigation on-site in the form of 26.17ha of SANG land located to the east and south of land proposed for residential development and associated open space of up to 290 dwellings. The location of the SANG and the proposed development area are shown on the Landscape and SANG Strategy Plan (CSA/2646/114L) contained in Appendix B.
- 1.10 At present it is understood that Wealden District Council (WDC) have not provided a metric for calculating SANG capacity for Ashdown Forest SPA and have set out within their SANG design guidelines that the metric adopted for Thames Basin Heaths (TBH) (8ha / 1000 residents) is not applicable. However, it is understood that Natural England still apply the TBH metric as a guideline and it has been confirmed via email (dated 26 June 2020) that Natural England are happy for this metric to be adopted for the proposed SANG at Bird in Eye Farm, South of Bird in Eye Hill. As such delivery of a 26.17ha SANG (plus additional walking routes) has the capacity to provide mitigation for c. 3,271 new residents (or 1363 units; using a 2.4 residents / unit factor).
- 1.11 Predicted occupancy rates (based on 2.4 people per dwelling), will result in c.5.57ha SANG land being required as mitigation for the proposed 290 units (696 new residents), leaving a headroom capacity of c.15.6ha which could potentially become available for mitigation of future local development of up to 1073 new units / 2575 new residents (using a 2.4 residents / unit factor).

Ecological Assessment

- 1.12 A series of baseline ecological surveys have been conducted at the proposed development Site during 2019 and 2020, to determine any constraints to the proposed change of use (such as the presence of protected species or vulnerable habitats) and to guide SANG design to provide maximum benefit to biodiversity. Of the protected species surveys undertaken, only targeted dormouse surveys were undertaken across the SANG itself. The findings and conclusions of these investigations are presented separately in the accompanying Ecological Impact Assessment (CSA/3687/02).
- 1.13 The proposed change of use will provide intrinsic benefits to biodiversity; through for example the cessation of agriculture and the installation of structural landscape planting to provide visual screening at site boundaries. In addition to these innate benefits, dedicated design measures to improve on-site biodiversity are proposed; over and above what would be required to deliver the primary SANG objectives. These dedicated ecological enhancements at the Site have been quantified using the prevailing Natural England Biodiversity Metric 2.0 (Beta Version; December 2019); full details are provided within the Biodiversity Net Gain Report (CSA/2646/15).

Consultation with Natural England

- 1.14 Consultation with Natural England has been undertaken through the Discretionary Advice Service (DAS), in order to agree the best approach for provision of the SANG. Initial proposals for the SANG provision which included an outline SANG design and accompanying briefing note, were provided to Natural England in December 2018. A site meeting between CSA and Natural England representatives was then undertaken in April 2019, and the key principals of the SANG provision were discussed. CSA provided an updated outline SANG Design to Natural England following the meeting, in order to address the points discussed. Natural England were largely positive about the potential for a SANG to be delivered at this Site; although some further advisories in terms of the SANG design were raised. The majority of these points have now been addressed / an agreement reached.
- 1.15 A brief summary of the key outcomes of the consultation are summarised below. SANG Design points:
- Originally, 12ha of SANG was proposed immediately adjacent to the area proposed for residential development at Bird in Eye Farm (this has now been extended to 26.17ha which includes land to the east as well as the south). This area currently comprises paddocks use for grazing and two areas of plantation broadleaved woodland. Significant enhancement of these areas, through new wildflower

meadow creation, woodland and hedgerow planting, plus suitable management of existing habitat resources is proposed to add visual, amenity and biodiversity interest. Natural England confirmed that provision of the SANG could offer a significant opportunity for providing net gain for biodiversity, in line with key principles set out within the government's 25 Year Environment Plan.

- Natural England raised some concerns about being able to achieve a suitable circular walk length (of at least 2.5km) within the original 12ha SANG proposed, indicating that despite the new habitat creation proposed that this may be a little convoluted. As such, extension of the SANG area to include further fields to the south (total SANG area now c. 21.17ha) has been agreed, which will achieve a circular walk of c. 2.7km.
- A pinch point in the walking route was identified where the path crosses back over itself at the eastern end of the parcel of Ancient Woodland which divides the northern and southern SANG parcels. Natural England raised this as being a potential constraint and advised that an alternative access is provided between the northern and southern sections of the SANG, through the Ancient Woodland, to avoid a bottleneck along the path at this point.
- An agreement has been made with the third party landowner, who owns this strip of Ancient Woodland, that a c. 6m corridor through the woodland will be included within the SANG land, such that the pinch-point in the walking route can be avoided.
- Natural England confirmed via email (dated 26 June 2020) that as the issue of the pinch-point had been addressed and the total SANG area has been increased to c. 26.17ha that the metric of 8ha/1000 units could be suitably applied, subject to Wealden District Council's agreement.

- 1.16 As set out above, proposed development at Bird In Eye Farm has the capacity to deliver a bespoke SANG which would meet Natural England's requirements for the level of development currently proposed; with scope (subject to agreement with Wealden District Council) to provide additional capacity which could serve future development within a 5km radius. The level of further development to be accommodated would need to be agreed with Wealden District Council.

Management in Perpetuity

- 1.17 A number of options exist for the management in perpetuity of the proposed strategic SANG. It is understood that Wealden District Council may want to take on the management of the SANG themselves. Additionally, Croudace Homes have been in consultation with the Land Trust on the scope of this management plan and Croudace have received a Letter of Intent from the Land Trust (see Appendix E).

2.0 SITE DESCRIPTION AND BACKGROUND

Site Context

- 2.1 The proposed strategic SANG is located on the eastern outskirts of Uckfield, adjacent to the eastern boundary of the development area. The area has a rural character and sloping views across open countryside to the south and east are available from the SANG. Surrounding land uses adjacent to the SANG include farmland and detached rural properties.

Site Description

- 2.2 An Extended Phase 1 survey was undertaken of the proposed development area and SANG site in April 2019 which identified the habitats described below. The development area consists of a series of improved grassland fields, hedgerows, trees and a strip of ancient woodland along the western and southern boundaries. The proposed SANG Site comprises further improved grassland fields, a treeline which separates it from the development area, and two small blocks of plantation Millennium Wood. A stretch of off-site ancient woodland (W2) and associated stream separates the northern and southern area of the SANG, with a strip of this woodland (c. 6m wide) included within the SANG area to facilitate a path through the woodland as part of the circular walking route.
- 2.3 Further Phase 2 surveys for protected species of the development area and the northern section of the SANG commenced in April 2019 and were completed in September 2020. A comprehensive Ecological Impact Assessment (EcIA) (CSA/2646/11/C) has been produced to accompany the planning application. Relevant results are summarised herein.

Topography

- 2.4 The fields in the SANG area are generally gently sloping, with some areas of higher ground present along the northern boundary of the Site providing views to the south and west. Overall the topography within woodland W2 appears varied and undulating, with some steeper sections sloping down towards the stream that runs centrally through the woodland.

Current Site Conditions

- 2.5 The main landscape features worthy of retention can be summarised as follows;

Improved Grassland

- 2.6 The Site is largely dominated by fields and paddocks of improved grassland, grazed by horses and ponies. Dominant species include perennial rye-grass *Lolium perenne*, meadow foxtail *Alopecurus pratensis*, white clover *Trifolium repens*, creeping buttercup *Ranunculus repens* and broadleaved dock *Rumex obtusifolius*. Other occasional species included creeping thistle *Cirsium arvense*, meadow crane's-bill *Geranium pratense*,

common field speedwell *Veronica persica*, ground ivy *Glechoma hederecea* and yarrow *Achillea millefolium*.

- 2.7 Much of the existing grassland will be retained and made available for amenity use, whilst other large areas will either be allowed to develop as long grassland or enhanced to wildflower meadow.

Hedgerows and Trees

- 2.8 A treeline is present along the western boundary between the SANG and the development Site, which runs north to south. Species include oak *Quercus robur*, silver birch *Betula pendula*, hazel *Corylus avellana*, hawthorn *Crataegus monogyna*, cherry *Prunus avium* and beech *Fagus sylvatica*.
- 2.9 A number of mature oaks with fused trunks are also present to the east of woodland W3, just within the proposed SANG boundary. These oaks have been classified as veteran trees, due to their age and size, in addition to the presence of a number of notable features including woodpecker holes and rot holes.
- 2.10 A hawthorn dominated native hedgerow is present along the eastern boundary of the southern SANG fields.
- 2.11 These features will be retained as part of the SANG design with new areas of tree planting provided across the proposed SANG site by way of biodiversity enhancement for net gain.

Woodland

- 2.12 Two blocks of plantation broadleaved woodland are present within the proposed SANG (W3 and W4 on the Habitats Plan in Appendix A). Species present include hazel, silver birch, hawthorn and blackthorn *Prunus spinosa*. Evidence of bark stripping by deer was noted throughout these woodlands. It is understood that both woodlands were planted under the 'Millennium Woods' scheme, and as such comprise stands of even aged semi-mature trees. These woodland blocks will be retained and enhanced as part of the SANG design to allow natural tree regeneration as well as development of ground flora, which is currently relatively sparse. These habitats will also provide a natural feel and areas of interest within the SANG.
- 2.13 Retention and enhancement of these key landscape features will assist in the ability of the SANG to integrate well into the existing local landscape and provide additional enhancements for biodiversity net gain in the longer-term through supplementary planting.

Influence on SANG design

- 2.14 As site containing and boarded by a number of woodland parcels, with a generally natural character, the Site is well-suited to the creation of a SANG. Additionally, the area has good capacity for the provision of biodiversity net gain through the creation and establishment of new meadow grass sward across the existing pastoral fields, with new native

tree and thicket planting to supplement and strengthen the existing landscape features, which could be achieved alongside delivery of the SANGs primary purpose.

- 2.15 The existing farmland use of the open fields will influence the range and species diversity of the potential grassland enhancement / creation to some degree, due to the likely higher nutrient levels of the soil, however through careful preparation, weed control and initial management; it should be feasible to establish a diverse, species rich sward with good native floral interest.
- 2.16 There is currently only one boundary hedgerow which creates some degree of enclosure to the SANG area, however additional natural boundaries will be created through additional thicket planting around the northern and north-eastern boundaries.
- 2.17 The existing topography can also be used to an advantage to create an interesting walking experience for users of the new SANG and affording views out toward the surrounding open countryside which will assist in integrating the SANG as a semi-natural environment, with limited detracting physical features.

Fauna

Bats

- 2.18 Woodland, hedgerow and grassland habitats within and adjacent to the SANG are considered to offer good opportunities for foraging and commuting bats. Bat activity survey work undertaken across the proposed development site to the north and west of the SANG in 2019 identified low levels of bat activity; dominated by, common pipistrelle *Pipistrellus pipistrellus*. With low levels of activity by soprano pipistrelle *P. pygmaeus*, *Nyctalus/Serotinus* species, *Myotis* species (including whiskered bat *Myotis mystacinus*) and *Plecotus* species (including brown long-eared *P. auritus* and was also recorded during the course of the surveys of the development area in 2019. Whilst bat activity survey work did not extend into the SANG, given the similarity of the habitats present to the proposed development area a similar assemblage of bat species / level of activity may be anticipated within the SANG. Favourable management and enhancement / diversification of semi-natural habitats within the SANG has the potential to improve foraging and dispersal opportunities for a range of bat species; several of which are S41 species of priority for conservation.
- 2.19 Mature trees within the SANG area are may offer potential roosting opportunities for bats due to the size and age of trees present within more mature woodland areas and hedgerow / tree lines. Whilst no tree removal is currently proposed; the potential for roosting bats to occur should be taken into consideration when planning any tree maintenance works.
- 2.20 All bats are legally protected under part 3 (section 41) of the Conservation of Habitats and Species Regulations 2017. All bats and their roosts in

England, Scotland and Wales were originally protected under the Wildlife & Countryside Act 1981.

Other Mammals

- 2.22 The woodland and hedgerow habitats within both the development area and SANG area provide suitable opportunities for dormouse *Muscardinus avellanarius*. Surveys undertaken across the development area in 2019 confirmed the presence of dormice and further surveys within woodland W3 within the SANG area and the edge of woodland W2 which is adjacent to the SANG were undertaken in 2020. Whilst no evidence of dormice using woodland W2 or W3 was recorded; given the confirmed presence of dormice (within woodland W1 and hedgerow H2) in 2019, it is assumed that dormice may use more established woodland habitat / suitable hedgerows and could disperse into sub-optimal habitat during certain periods. Delivery of new scrub / tree planting within the SANG has the capacity to increase the amount of available habitat / resources for dormice; and with sensitive management increase habitat suitability for this species.
- 2.23 Dormice and their habitats are afforded protection under the provision of the Habitats Regulations, and as such their presence need to be considered during habitat management operations.

Birds

- 2.24 The habitats within the SANG offer a range of foraging opportunities for birds, and in particular, the trees, hedgerow and woodland habitats in and around the SANG offer suitable nesting opportunities for a range of bird species associated with these habitat types.
- 2.25 A barn owl box is also present on a tree within the treeline along the western SANG boundary (see Target Note 7 on the Habitats Plan in Appendix A) and a barn owl was seen flying out of the box during a site visit in 2019. Anecdotal accounts from the landowner also suggest that barn owl may use this box for nesting.
- 2.26 All wild birds, their active nests and eggs are protected under the Wildlife and Countryside Act 1981. Habitats within the Site provide extensive nesting opportunities for common and widespread bird species. In addition, barn owl are a Schedule 1 species under the Wildlife and Countryside Act 1981 and afforded protection from disturbance. As such, as their presence needs to be considered during habitat management operations.

Reptiles

- 2.27 A reptile survey of open habitat within the development area recorded low populations of slow worm *Anguis fragilis*, grass snake *Natrix natrix* (syn. *Helvetica*) during 2019. It is considered that there is some potential for these species to use woodland glade habitat within the SANG area for basking and foraging and plantation areas for hibernation during winter, however the majority of grassland habitats present support a short-grazed sward and as such are considered sub-optimal for reptiles. Wildlife friendly and more relaxed management within the SANG will provide good scope for the provision of new opportunities for reptiles.
- 2.28 Reptiles are afforded protection under Schedule 5 of the Wildlife and Countryside Act 1981 and are afforded protection against killing and injury. In addition, all native British reptile species are Section 41 Species of Principle Importance in England.

Amphibians

- 2.29 A great crested newt *Triturus cristatus* presence/absence survey was undertaken in the spring of 2019. Smooth/palmate newt *Lissotriton* sp., were identified in a pond within woodland W2, however eDNA sampling of ponds within 500m of the development area all returned negative results indicating that great crested newts are absent. However, smooth/palmate newt *Lissotriton vulgaris/helveticus* was recorded in Pond 1 within woodland W2 and as such these species are likely to use terrestrial habitats such as woodland, scrub and hedgerow basis within the proposed SANG. Provision of new habitat opportunities such as new areas of thicket planting and wildflower meadow, in addition to the creation of three new wildlife ponds will provide new opportunities for amphibians.

Invertebrates

- 2.30 Several records of notable invertebrate species were provided from within 1km of the development area. The on-Site habitats could support a range of invertebrates however it is considered unlikely that a significant assemblage is present given the grazed management of the grassland and limited plant assemblage across the majority of the Site. The ancient woodland is likely to support a greater range of invertebrate species, although this habitat will not be directly impacted as a result of the proposed development or implementation of the SANG. Creation of new areas of wildflower grassland and thicket in addition to the enhancement of woodlands W3 and W4 are likely to provide new opportunities for a range of invertebrate species.

3.0 GENERAL OBJECTIVES / SANG STRATEGY

SANG Provision

- 3.1 The proposed strategy for the SANG is shown on the Landscape and SANG Strategy Plan (CSA/1586/114/L) contained in Appendix B. The strategy has been prepared following consultation with representatives from Natural England and using guidance set out in Wealden District Council's Guidelines for the creation of Suitable Alternative Natural Green Space (SANGS).
- 3.2 Natural England SANGs Quality Guidance describes the essential features of the SPA which are valued by visitors and should be replicated in the SANG. It provides guidelines on the type of site which should be identified as SANG and the measures that can be taken to enhance it. The document provides a site quality checklist listing 'must haves', 'should haves' and 'desirables' which have all been considered during the design of the SANG at Bird in Eye Farm, South of Bird in Eye Hill. Full details of the checklist and how the SANG fulfils the criteria can be found in Appendix C.
- 3.3 The proposed area for SANG will be designed in order to provide a significant recreational resource for the local community. It will also be planted and managed to provide a significant benefit for local wildlife. The key features of the proposed SANG are as follows:
- Provision of a dedicated area of car parking for SANG visitors;
 - Safe access for walkers to the SANG from the proposed development area and car park, and maintenance of a safe environment for users of the car park and SANG area;
 - Provision of a circular walk c.2.7km in length which will exploit existing paths and link to existing footpaths in the surrounding area;
 - Provision of unrestricted access throughout the SANG, though marked pathways will be provided and maintained;
 - Maintenance of open grassland areas to permit dogs to exercise safely off the lead;
 - Enhance habitat diversity through native planting, habitat alteration, provision of a wildlife pond and appropriate management;
 - Provision of wildlife features including log piles, bird boxes and bat boxes;
 - Management works to be appropriately timed to avoid/minimise impacts to wildlife;
 - Incorporation of amenity features by providing benches (of rustic/naturalistic design) and enhancing viewpoints; and
 - Promotion of the SANG to new occupants through production of informative leaflets to be dispensed within new homebuyers packs.

- 3.4 This document aims to prescribe works to retain, and enhance habitats and guide the future management of the SANG for the benefit of wildlife. In addition, works are also intended to generally increase the botanical diversity and habitat structure on site for the benefit of local wildlife and to permit public access across the SANG. This plan is intended to provide a framework for the first ten years of management. The management prescriptions should be updated once a detailed SANG design is produced and assessed regularly to ensure the success of the regime and to allow revised prescriptions to be considered, if necessary.
- 3.5 Within this Plan, the management objectives and prescriptions for different habitats and features at the site are dealt with separately within the following four chapters:
- Infrastructure and interpretation
 - Grassland;
 - Woodland, trees and hedgerows; and
 - Waterbodies
- 3.6 Detailed tables of management prescriptions and timings are given at the end of this document. Some management tasks will apply to all or several Management Areas.

SANG Management Responsibilities

- 3.7 The initial establishment and management responsibilities will lie with Croudace Homes. Following the implementation of the landscape and ecology works and initial maintenance in Years 1, management responsibilities will be taken on by a third party.
- 3.8 Feasibility of The Land Trust to take on the future management of the SANG has been explored. Management of the SANG would need to be secured in perpetuity; and under The Land Trust model an endowment would be paid by Croudace to fund this. The Land Trust will thereafter remain responsible for the SANG provision and maintenance in perpetuity, in accordance with this Management Plan.
- 3.9 The endowment fund requirements have been calculated to provide returns sufficient to pay for the annual costs of management and maintenance of the SANG, and for the ongoing replacement of capital items that include paths, fencing, bins and interpretation. The costs of managing the SANG have been calculated by The Land Trust using rates and costs taken from comparable sites under management. It is envisaged that this endowment mechanism will be secured through a S106 agreement.

4.0 GENERAL MANAGEMENT CONSIDERATIONS

Trees

- 4.1 Trees within the SANG should be monitored regularly for signs of poor health or damage. Management intervention should only be undertaken if required on the grounds of health and safety.

Deadwood

- 4.2 Standing and fallen / wind-blown deadwood offer opportunities to a variety of wildlife including roosting bats, nesting birds, fungi and invertebrates. Therefore, in order to maximise biodiversity it is essential that both forms of dead wood are conserved within the boundaries of the site. This habitat also adds variety and interest for people using the SANG. As there will be informal public access to most areas of the site, it is likely that some standing deadwood removal will be required for health and safety reasons at some stage. On such occasions the following is recommended;

- Every effort should be made to retain the standing dead trunk;
- If fallen or cut wood has to be moved it should be left in as big pieces as possible and moved to an area as close as possible to the parent tree;
- Where felling is necessary it should be conducted by suitably qualified persons;
- Where possible all wind-blown deadwood should be left intact where it falls, and
- Where there is a health and safety risk, or this blocks access (e.g. tree falls across footpath) then the fallen section should be moved in its entirety to a suitable area in close proximity, or where necessary cut up into smaller manageable pieces. Consideration to moving fallen deadwood will need to be given to avoiding impacts to fauna and sensitive areas of ground flora.

Protected species

- 4.3 Surveys for protected species within the surrounding area have identified a range of widespread bat, dormouse, bird and reptile species which are known to / likely to use the SANG's habitats. Common lizard and grass snake have been recorded within suitable habitats in the development area, as have dormice and there is the potential for these species to use the SANG habitats also. Future management works will need to consider potential for impacts to these species/groups. For example:

- Impacts to the ground (soils, root balls and other sub-surface features) within areas of dense scrub and woodland habitat should be avoided in the winter months, where possible, when herptiles (reptiles and amphibians) may be hibernating in such areas;
- Areas of grassland should be cut in a way to minimise impacts to wildlife found within this habitat (i.e. not cut below c.10cm);

- Scrub removal, hedgerow trimming and any tree surgery works should be undertaken outside of the main bird nesting season (March to August inclusive) to ensure breeding birds are not disturbed / directly impacted; and
- If any tree surgery works to mature trees is required, as part of the future maintenance of the site, these should be assessed for their potential to support roosting bats, by a suitably qualified bat worker.

Maintenance of new planting

- 4.4 All new planting will be maintained in accordance with good horticultural practice to ensure the thriving of individual species.
- 4.5 All new / replacement planting will be conducted into well-prepared ground following good horticultural practice. All new native transplants should be protected with proprietary rabbit guards or shrub shelters.
- 4.6 Sufficient watering will be undertaken by the contractor to establish and maintain healthy plant growth.
- 4.7 Peat-based composts will be avoided.
- 4.8 All plants will be maintained in a disease and pest free state. In most instances, 'natural' methods of pest control are to be undertaken prior to any chemical application. In the event that natural methods of eradication are unsuccessful, plants will be treated through the application of a suitable proprietary herbicide/pesticide.
- 4.9 All trees and shrubs will be monitored for any sign of defects or poor health annually or after severe weather. Any signs of ill health or damage will be noted and remedial action when required.
- 4.10 Tree stakes, ties and guards will be checked annually for adjustment and/or replacement/removal as required.
- 4.11 Areas of shrub / tree planting with a bark mulch layer will be topped up annually in the spring to retain moisture and limit weed growth, to a nominal depth of 50-75mm.
- 4.12 All planting areas will be kept tidy and free from weeds, trimmings, debris and litter. Weeds should be removed by hand unless where it is unfeasible; whereby weeds can be treated by the application of a suitable proprietary herbicide.
- 4.13 All new tree and shrub planting will be protected from damage by deer through the implementation of shrub /tree guards at a height of 1.2m high.

5.0 SANG INFRASTRUCTURE AND INTERPRETATION

- 5.1 Research has shown that the primary catchment area of recreational sites is 400m linear distance from the site boundary. Accordingly, WDC SANG guidelines require that, "unless SANGS are small in size or provided adjacent to and for the sole use of a specific development and / or a local population living adjacent to the forest then they will need to be designed to attract visitors who arrive by motorised transport."
- 5.2 Domestic dogs are well documented to damage the qualifying interests of the SPA, and it is clear from SPA visitor survey data that the perceived suitability of a site to exercise dogs is a key factor in the users' selection of site to visit. As such, the proposed SANG will target dog walkers in particular.

Objectives

- (i) Advertise the presence of the SANG and encourage its use by new and existing members of the public, including those in excess of 400m from the SANG;
- (ii) SANGS must be perceived as natural spaces without intrusion from artificial infrastructure or buildings except in the vicinity of car parks. Visually sensitive way-markers and some benches if appropriately located will be acceptable.
- (iii) Promote the use of the SANG by dog walkers;
- (iv) Limit the impact of dog fouling and littering,
- (v) SANGS must seek to provide a rural and wild feel with a variety of habitats for visitors to experience (e.g. some of woodland, scrub, grassland, heathland, wetland, open water)
- (vi) Promote accessibility for the physically disabled and safe access for all users; and,
- (vii) Enhance public appreciation of, and engagement with the site.

Prescriptions

Design / Initial Instatement Works

Car Park

- 5.3 The proposed SANG is located immediately adjacent to the proposed development area and as such it will be within walking distance from the new dwellings in the proposed residential development. However, based on 8ha or SANG per 1000 residents, only c.5.57ha SANG land will be required for mitigation leaving a headroom capacity of c.15.6ha which could potentially become available for mitigation of future local development. This overprovision will widen the catchment of the SANG and

is expected to help draw recreational pressure from the existing local population, thereby reducing pressure on the SPA.

- 5.4 As such, a car park is being provided to accommodate visitors travelling from in excess of 400m from the SANG. The car park will be sited in the north-west corner of the SANG and accessed through the proposed development area as shown in the Landscape Strategy and SANG Design Plan (CSA/2646/114/L) provided in Appendix B. A height restriction to 2.0m will be installed at the entrance to the initial drop off point, which will restrict entry by commercial vehicles and thereby reduce the risk of fly tipping within the SANG (and will enable the car park to be closed, with a welded padlock box being provided for security). No artificial lighting will be included in the SANG car park.
- 5.7 A cycle rack will also be provided within the car park for visitors wanting to cycle to the SANG. The Car park will be bound with post and rail with wire stock proof fence to enclose the car park from the road network for the protection of dogs off leads.

Signage and Advertisement

- 5.8 The entrance to the car park will be signposted from the road, to advertise the presence of the SANG, using a brown 'tourist' sign. In addition, leaflets to promote awareness of the SANG will be included in new resident packs for new homes in the completed residential development. These leaflets, which will be designed in consultation with Wealden District Council, will describe the benefits of the SANG, show walking routes, and provide information on wildlife which users may encounter.

Litter and Dog Mess Bins

- 5.10 As well as detracting from the user experience, dog fouling can damage habitats through localised soil enrichment. Litter such as discarded glass bottles can also present hazards to wildlife, and reduce the visual appeal for SANG users. Indicative locations have been selected, as shown on the Landscape Strategy and SANG Design Plan (CSA/2646/114/L contained in Appendix B.

Seating

- 5.11 Similarly, strategic and discrete locations have been selected to provide seating, where SANG users can rest and appreciate views across the site.

Interpretation Boards

- 5.12 In order to enhance visitor understanding and appreciation of the SANG, interpretation boards will be positioned at key access points. These boards will show potential walking routes, describe wildlife which may be encountered and promote responsible use of the SANG. The interpretation board at the car park access point will incorporate a notice board

window, allowing the addition of community information, announcements and leaflets.

Fencing

- 5.13 In order to minimise visual intrusion by artificial infrastructure, defensive planting in preference to fencing will be used to mark the boundaries of the SANG. However, in the southern fields of the SANG, a 6m wide right of way around the boundary of the SANG will be retained to allow access to a third party landowner who owns Woodland 2. This area will be fenced off from the SANG using dog proof stock fencing and Chestnut paling fencing will be provided either side of the path through Woodland 2 to prevent trespassing into this woodland. Furthermore, the perimeter of the SANG will be bound with post and wire stock fencing to prevent trespassing into third party land outside of the SANG boundary.

Footpaths

- 5.14 Links will be made to existing Public Rights of Way to the south of the SANG to allow connectivity to existing public footpaths and for extended walking routes. The majority of footpaths through the SANG will be mown, with the exception of the footpath through the central woodland W2 which will be no dig hoggin construction in order to minimise impact and be sensitive to the woodland setting as well as ensure safe access throughout the year.
- 5.15 The existing bridge which crosses the stream within woodland W2 will need to be upgraded to support the amount of footfall expected through the SANG. A detailed bridge design will be provided at the Reserved Matters stage of the application.

In Perpetuity Management

- 5.16 Dog waste / litter bins will be emptied up to once per week or as required, at which point any litter immediately surrounding the bins will be picked and removed. Litter accumulated throughout the remainder of the site will be targeted through the management of the respective areas, as outlined in the following sections.
- 5.17 There will be biannual 'fit for purpose' checks of all SANG furniture carried out by the management company. Checks will be made for signs of wear, decay and vandalism. Where it is apparent that any one item of furniture is no longer safe (such as broken seating), fit for purpose (such as broken fencing), or has become visually unappealing (such as vandalised interpretation boards), this item will be promptly repaired or replaced as appropriate. These checks will be undertaken at the end of the summer period, where SANG furniture is likely to have received most intensive use, and in the early spring following wet and windy winter weather. Biannual checks of the car park surfacing will also be completed and remedial action taken as necessary.

6.0 ESTABLISHMENT AND MANAGEMENT OF GRASSLAND HABITATS

Objectives

- (i) Enhance the botanical species diversity of grassland habitats within the SANG through appropriate management of retained grasslands and planting new wildflower meadow;
 - (ii) Increase the habitat's carrying capacity for vertebrate and invertebrate fauna;
 - (iii) Maintain a network of mown informal pathways to encourage public access and minimise disturbance to grassland;
 - (iv) Provide significant areas of open grassland to allow dogs to exercise freely; and,
 - (v) Control and manage the extent of scrub and prevent its encroachment into open grassland areas.
- 6.1 Existing land cover at the application site, including the proposed SANG area, is dominated by agriculturally improved grassland, reflecting the site's use for horse and cattle grazing.
- 6.2 The existing improved grassland is heavily grazed, with the resulting short, species-poor sward dominated by perennial rye-grass *Lolium perenne*, meadow foxtail *Alopecurus pratensis*, white clover *Trifolium repens*, creeping buttercup *Ranunculus repens* and broadleaved dock *Rumex obtusifolius*.
- 6.3 In-keeping with the broader SANG objectives, some areas of grassland (shown as wildflower grassland on the Landscape Strategy and SANG Design Plan) will be returned to traditional meadow management to provide a naturalistic environment for users, and biodiversity value will be enhanced with the establishment of new wildflower grasslands. Access and layout design features have taken into consideration the need to promote use of the site for dog walking, as introduced in the previous section.

Retained Meadow Grassland

Longer Grassland Areas

- 6.4 The areas shown as 'Longer Grassland' and 'Natural Succession' areas will comprise the existing grassland sward which will be managed to enhance its biodiversity value. Significant areas of grassland are to be retained within the SANG, ensuring an immediate, established habitat as a recreational resource for new users. Long-term management of this habitat will seek to achieve a gradual reduction in soil fertility, allowing for less competitive floral species to colonise and establish over time, generating a more diverse grassland community. During construction/establishment, given the established nature of the grassland, no specific works are deemed to be required.

- 6.5 Management over the first five years will primarily seek to reduce the nutrient load within the soil, leading to the gradual reduction in coarse grassland and noxious weed species and compliment those habitats proposed within adjacent areas. As such, works will be limited to the completion of a hay cut regime, to be mown annually in early September and cut to a height of 75mm. Cuttings will be left for 3 to 5 days to dry and for seeds to drop, before collecting and removing from site to a suitable area for depositing cuttings away from water courses. Cutting will be avoided when prolonged rainfall is forecast.

Natural Succession Areas

- 6.6 In order to maintain structural diversity within the SANG, and moreover to ensure the retention of significant areas of longer vegetation for faunal species, pockets of retained grassland (20%) will remain uncut on rotation each year. Where necessary, ongoing management will include for topping of noxious weeds. Topping is considered likely to be of reduced importance in the longer term as the nutrient levels and weed seed base within the soil is depleted by on-going management.

Wildflower Meadow

Design / Initial Instatement Works

- 6.7 A number of north-south swathes within the SANG will be established as wildflower grassland, to provide visual interest for SANG users and enhance biodiversity value. The swathes are shown on the Landscape Strategy and SANG Design Plan (CSA/2646/114/L) contained in Appendix B. The area will first have the soil prepared through spraying with a suitable herbicide (e.g. glyphosate) to provide a stale seed bed prior to seeding, and the dead vegetation removed. This will reduce competition with the newly planted wildflower species. The topsoil will be harrowed or raked to a medium tilth, then rolled prior to sowing. Soil cultivation and spraying will be sensitively undertaken when in proximity to trees.
- 6.8 The wildflower mixture (EM2 from Emorsgate Seeds or similar) will be sown comprising 80% grass and 20% flower species. Wildflower grassland is best sown in the spring but can be sown in the autumn (September-October). The seed bed will be rolled or treaded following sowing to ensure good contact with the soil and ground moisture. Rolling will be done in dry conditions so as not to damage the soil structure.
- 6.9 Seeded areas will be fully watered at the time of sowing and sufficient watering will be carried out thereafter to ensure healthy establishment of the sward. Aggressive weed growth will be controlled through hand-pulling or the controlled use of herbicides, e.g. spot spraying or weed wipes, on a monthly basis.
- 6.10 If sown in the spring, the grassland will be topped regularly during Year 1 to promote growth and remove unwanted annual weeds. If autumn sown, spring mowing will not be undertaken to below 70mm as yellow-rattle *Rhinanthus minor* will be germinating. Arisings will be removed from the

meadow area to prevent excess nutrients accumulating. Mowing will not take place on wet ground.

- 6.9 The SANG has been designed to provide large open spaces of grassland to allow dogs to be freely and safely exercised off the lead. The walking routes as shown on the SANG Strategy Plan will be mown into the wildflower and meadow grasslands, to a length that they are clearly visible. The primary circular walking route will be maintained at c. 2m in width, with the secondary routes mown to a lesser width of c. 1m to make clear the distinction. Small areas of additional grassland, such as at the viewpoints, will also be mown to provide areas for play and picnicking.

In Perpetuity Management

- 6.11 The ongoing management of the meadow (longer grassland) and wildflower grasslands will be equivalent, therefore grassland management is prescribed as one here. For the second and subsequent years the grasslands will be managed with an annual cut to c. 150mm in late summer (August or early September), allowing the plants to flower and set seed before cutting. Arisings will initially be left in situ for 1-7 days to shed seeds, before being collected into habitat piles.
- 6.12 Additionally, in Years 2 and 3 (and thereafter as required) a further cut will be taken in spring to remove any excessive winter growth of grass or weeds which might compete with wildflowers, and arisings collected to prevent the build-up of nutrients. The grassland will then be left uncut to flower during the summer. No fertiliser will be added to the grassland habitats at any point during their establishment or maintenance.
- 6.13 The success of the grassland establishment will be checked regularly with any bare patches of newly planted wildflower grassland re-sown. Germinating weeds will be controlled through pulling or selective herbicide use as necessary, though this problem should reduce once the wildflower sward becomes established. The management regime should be reviewed and adjusted as necessary in Year 5 of this plan.
- 6.14 Arisings from grassland cutting will be stacked to compost down on site, in several discrete locations throughout the SANG. These compost piles will provide a habitat resource for invertebrates, reptiles and amphibians, and present a more practical and sustainable approach to disposal of arisings. However, if under monitoring it is identified that compost piles are becoming visually intrusive or are encouraging fly tipping of green waste, this aspect of management will need to be reviewed.
- 6.15 An annual inspection of scrub cover will be undertaken to monitor its growth in order to ensure that it is not encroaching on areas of grassland. Any such encroachment will be managed with an annual cut in the

autumn (thereby avoiding disturbance of bird nesting). Cutting should be undertaken using hand held equipment, taking care not to disturb the underlying ground conditions. Areas of amenity grassland will be cut up to five times per year.

- 6.16 Where litter is encountered during any routine or reactionary management operations, this will be collected and removed. In addition, there will be a dedicated annual sweep for litter and any other discarded items. This will be undertaken during the winter months, where grassland boundary scrub has died back and will facilitate the identification and retrieval of litter.

7.0 ESTABLISHMENT AND MANAGEMENT OF WOODLAND, TREES AND HEDGEROWS

- 7.1 The proposed SANG area contains two blocks of plantation broadleaved woodland as well as a treelines running north to south along the western boundary of the SANG area. Additionally, a number of mature trees are present within the SANG, most notably a veteran oak tree to the east of Woodland 3. All of these habitats will be retained within the proposed SANG.
- 7.2 The plantation woodland and treeline within the site contain oak *Quercus* sp. cherry *Prunus* sp., silver birch, hazel, blackthorn and hawthorn.
- 7.3 As part of the SANG strategy, new woodland and thicket planting will be implemented in order to augment the existing green infrastructure, and provide a diverse and appealing recreation area in addition significant areas of the SANG will be managed to promote natural woodland colonisation in the long term in a process termed 'wilding'. Wildling as an approach is adopted by the Land Trust at a number of their sites and ensures that new areas of woodland will establish from local genetic stock, ensuring a natural and diverse woodland community is established which reflects the species of prominence in the local area.

Objectives

- (i) Retain the vast majority of existing trees, shrubs and hedgerows within the SANG and incorporate these into the design of new planting a more naturalistic habitat forms;
- (ii) Only remove trees where this will benefit both biodiversity and amenity site value;
- (iii) Augment floral species-diversity through additional woodland and thicket planting;
- (iv) Utilise strategic woodland and thicket planting to screen views / compartmentalise sections of the circular walk;
- (vi) Maximise the value of retained and created habitats for biodiversity;
- (vii) Maximize connectivity of woodland habitats across the site for wildlife; and,
- (viii) Monitor trees and manage for safety and to maintain healthy growth, attractive form and promote longevity.

Prescriptions

Design / Initial Instatement Works

- 7.4 Areas of new native woodland and thicket planting will be provided throughout the SANG, in order to provide additional habitat and create screening, variety and interest along the route of the circular walk. New

planting will also be used to create new connections across the site between existing habitats, to facilitate the movement of wildlife through the site and local area. Planting areas are shown on the Landscape Strategy and SANG Design Plan (CSA/2646/114/L) contained in Appendix B.

- 7.5 The establishment and maintenance of new planting will accord with best horticultural practice and the general measures set out in Section 4. New tree and shrub planting will be undertaken during the winter months (November - February), the most appropriate time for planting, during a period free from frost. New plants will be sufficiently secured and protected through the use of guys, stakes and guards where appropriate. Scrub and weeds within the planting area will be controlled to prevent excess competition with new plants. Where woodland is proposed in areas already colonised by dense scrub (as is the case in some discrete areas in the east of the site) these will be allowed to gradually become woodland through natural succession, rather than through clearance and replanting.
- 7.6 Limited tree clearance will take place and will be limited to minor clearing within the plantation woodlands (Woodlands 3 and 4) to allow greater light into these areas and promote ground and shrub layer flora.
- 7.7 Selected cordwood arisings from felled trees will be used to create log piles within areas of existing and newly planted woodland. These will provide opportunities for a variety of wildlife including invertebrates, reptiles, amphibians and small mammals.

In Perpetuity Management

- 7.8 As established in Section 4, all future management operations will need to fully accord with legislation pertaining to protected species. In order to avoid impacts to nesting birds, scrub removal, hedgerow trimming and any tree surgery works will either be undertaken outside of the main bird nesting season (March to August inclusive), or following the completion of a nesting bird check by an appropriately qualified ecologist. Furthermore, any required tree surgery works to mature trees will be in accordance with BS8596:2015 on Surveying for Bats in Trees and Woodland.
- 7.9 Existing and new woodland planting will be monitored, and management intervention will be kept to a minimum. Weed growth at the base of new planting will be checked by regularly strimming between plants. As detailed in Section 4, all trees and shrubs will be monitored for any sign of defects or poor health annually or after severe weather. Any signs of ill health or damage will be noted and remedial action taken as required.
- 7.10 Rotational hedgerow trimming will be undertaken annually, trimming only one side of each hedgerow on each occasion, such that each side receives trimming on an alternate inter-annual basis, promoting structure

and minimising short term impacts to wildlife. Hedgerows will be topped once every two years, taking care to retain any standard trees. Hedgerow trimming will be completed during the late autumn or early winter months, with all arisings collected and removed from site.

- 7.11 Where litter is encountered during any routine or reactionary management operations, this will be collected and removed. In addition, there will be a dedicated annual sweep for litter and any other discarded items, including that which may have become attached to or accumulated within areas of scrub, woodland or thicket planting, or within the canopy, branches or trunks of individual trees. This will be undertaken during the winter months, where trees are not in leaf and scrub has died back, which will facilitate the identification and retrieval of litter.

8.0 ESTABLISHMENT AND MANAGEMENT OF WATERBODIES

- 8.1 The proposed SANG design includes the creation of a wildlife pond, which will provide enhancements for biodiversity and new opportunities for amphibians and reptiles.

Objectives

- (i) Provide new wetland habitat resources which add to habitat diversity within the Site through creation of new standing water habitat, benefiting a range of wildlife species.

Prescriptions

Design / Initial Instatement Works

- 8.2 A new wildlife pond will be created within the SANG, as shown on the Landscape Strategy and SANG Design Plan (CSA/2646/114/L) contained in Appendix B. The pond will provide a feature of interest to SANG users and will be managed to promote biodiversity.
- 8.3 The plant species greater pond sedge *Carex riparia*, soft rush *Juncus effusus*, marsh marigold *Caltha palustris* and yellow flag-iris *Iris pseudacorus* will be planted at the margins of the ponds to provide wildlife habitat and aesthetic value. The pond will also be planted with native floating and aquatic species, such as common hornwort *Ceratophyllum demersum*, common water starwort *Callitriche stagnalis*, and water plantain *Alisma plantago-aquatica*.
- 8.4 The locations of proposed pond is shown on the Landscape Strategy and SANG Design Plan (CSA/2646/114/L) contained in Appendix B. The pond will be enhanced in its biodiversity value through appropriate management.
- 8.5 The pond will be planted with submerged macrophytes, which will add visual appeal to the ponds as well as supporting communities of aquatic invertebrate and amphibian wildlife. Marginal wet shelves and gentle profiles will be created to encourage the establishment of emergent marginal macrophytes. This will also serve to promote safety of SANG users.
- 8.6 Fish will not be introduced to the ponds as these species can suppress other wildlife communities.

In Perpetuity Management

- 8.7 Emergent and marginal pond vegetation may require cutting back to prevent the pond becoming clogged with plants or dead organic matter. Management is unlikely to be required in the first five years, however this will be monitored on an annual basis. Emergent pond vegetation will be controlled if it starts to exceed 50% of the surface of the pond, but removal

will not reduce coverage to less than 25%. If required, management will occur in the autumn, with different sections of the pond vegetation cut back or cleared in a rotational manner across different years. Any arisings from the cutting of emergent vegetation will be left at the edge of the pond for 24 hours, to allow any associated fauna to escape, before being collected up and removed composted on-site.

- 8.8 This management plan does not prescribe the use of fertiliser anywhere within the SANG. It is important that, should subsequent revisions to management provide for the use of fertilisers, these will not be used in close proximity to waterbodies. Such use would increase the risk of run-off pollution, algal blooms and deoxygenation of waterbodies.
- 8.9 Where litter associated with the ponds and ditches is encountered during any routine or reactionary management operations, this will be collected and removed. In addition, there will be a dedicated annual sweep for litter and any other discarded items. This will be undertaken during the winter months, where emergent and marginal macrophytes have died back, which will facilitate the identification and retrieval of litter.

9.0 MANAGEMENT ADVICE AND WORKS SCHEDULE

- 9.1 A schedule for all prescriptions is provided in the tables below, giving a timetable for management actions for a period of ten years.
- 9.2 An annual review of management success and failures will be undertaken by site managers, with corrective actions planned and completed where appropriate. A more thorough review of the management prescriptions will be undertaken after 5 years, in case more significant alterations are required. A new management plan should be prepared by site managers prior to the end of Year 10 of this plan, taking a further 10-year view of management requirements at the site.

MANAGEMENT OF SANG INFRASTRUCTURE, INTERPRETATION AND WILDLIFE FEATURES						
Area/Asset	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6 -10
Car park	Construction of car park and connecting path to circular walk.	Biannual checks (early spring/late summer) of surfacing and furniture with remedial action as required.	Biannual checks (early spring/late summer) of surfacing and furniture with remedial action as required.	Biannual checks (early spring/late summer) of surfacing and furniture with remedial action as required.	Biannual checks (early spring/late summer) of surfacing and furniture with remedial action as required.	Biannual checks (early spring/late summer) of surfacing and furniture with remedial action as required.
Signage	Erect SANG car park signage from Bird in Eye Hill access.	Biannual checks (early spring/late summer) of fitness for purpose. Clean and trim back obscuring vegetation as necessary.	Biannual checks (early spring/late summer) of fitness for purpose. Clean and trim back obscuring vegetation as necessary.	Biannual checks (early spring/late summer) of fitness for purpose. Clean and trim back obscuring vegetation as necessary.	Biannual checks (early spring/late summer) of fitness for purpose. Clean and trim back obscuring vegetation as necessary.	Biannual checks (early spring/late summer) of fitness for purpose. Clean and trim back obscuring vegetation as necessary.
Dog/litter bins	Distribution of combined dog mess/litter bins. Empty weekly, or less frequently as appropriate.	Empty weekly, or less frequently as appropriate. Biannual checks of fitness for purpose. Clean, repair and replace as necessary to maintain function.	Empty weekly, or less frequently as appropriate. Biannual checks of fitness for purpose. Clean and replace as necessary to maintain function.	Empty weekly, or less frequently as appropriate. Biannual checks of fitness for purpose. Clean and replace as necessary to maintain function.	Empty weekly, or less frequently as appropriate. Biannual checks of fitness for purpose. Clean and replace as necessary to maintain function.	Empty weekly, or less frequently as appropriate. Biannual checks of fitness for purpose. Clean and replace as necessary to maintain function.
Seating and Interpretation	Distribution of timber seats and interpretation boards.	Biannual checks (early spring/late summer) for wear, decay or vandalism. Repair or replace damaged, dangerous or defaced furniture as appropriate.	Biannual checks (early spring/late summer) for wear, decay or vandalism. Repair or replace damaged, dangerous or defaced furniture as appropriate.	Biannual checks (early spring/late summer) for wear, decay or vandalism. Repair or replace damaged, dangerous or defaced furniture as appropriate.	Biannual checks (early spring/late summer) for wear, decay or vandalism. Repair or replace damaged, dangerous or defaced furniture as appropriate.	Biannual checks (early spring/late summer) for wear, decay or vandalism. Repair or replace damaged, dangerous or defaced furniture as appropriate.
Other Infrastructure	Installation of post and rail fencing around southern SANG fields and through Ancient Woodland	Biannual checks of fitness for purpose. Repair and replace as necessary to maintain function.	Biannual checks of fitness for purpose. Repair and replace as necessary to maintain function.	Biannual checks of fitness for purpose. Repair and replace as necessary to maintain function.	Biannual checks of fitness for purpose. Repair and replace as necessary to maintain function.	Biannual checks of fitness for purpose. Repair and replace as necessary to maintain function.

Hibernacula and log piles	Establish 2no. Artificial hibernacula as per the specification. Use selected cordwood from neighbouring sites to create log piles in discreet locations.	Supplement log piles with selected cordwood arisings as available. Note that standing and fallen deadwood should be retained in situ wherever possible.	Supplement log piles with selected cordwood arisings as available. Note that standing and fallen deadwood should be retained in situ wherever possible.	Supplement log piles with selected cordwood arisings as available. Note that standing and fallen deadwood should be retained in situ wherever possible.	Supplement log piles with selected cordwood arisings as available. Note that standing and fallen deadwood should be retained in situ wherever possible.	Supplement log piles with selected cordwood arisings as available. Note that standing and fallen deadwood should be retained in situ wherever possible.
Bird boxes	Erect 8no. assorted woodcrete bird boxes under direction of ecologist.	n/a	n/a	n/a	Replace missing bird boxes if required.	Replace missing bird boxes if required in Year 10.
Bat boxes	Erect 8no. assorted woodcrete bat boxes under direction of ecologist.	n/a	n/a	n/a	Replace missing bat boxes if required. Note that bat boxes should only be inspected by a licenced bat worker.	Replace missing bat boxes if required in Year 10. Note that bat boxes should only be inspected by a licenced bat worker.

MANAGEMENT OF WOODLAND, TREES AND HEDGEROWS						
Area/Asset	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6 -10
New woodland planting	Planting during Nov – Feb in a period free from frost. Use guys, stakes and guards as appropriate to protect stock. Control scrub and weeds to prevent competition.	Fit for purpose check of guys, stakes and guards, repairing or replacing as necessary. Control scrub and weed establishment between planting. Monitor planted stock for defects or disease and treat or replace as necessary.	Fit for purpose check of guys, stakes and guards, repairing or replacing as necessary. Control scrub and weed establishment between planting. Monitor planted stock for defects or disease and treat or replace as necessary.	Remove guys, stakes or guards where no longer required. Control scrub and weed establishment between planting if necessary. Monitor planted stock for defects or disease and treat or replace as necessary.	Remove guys, stakes or guards where no longer required. Control scrub and weed establishment between planting if necessary. Monitor planted stock for defects or disease and treat or replace as necessary.	Monitor stock for defects or disease and treat as necessary.
Existing trees and woodland	Annual check for signs of disease or decay. Management intervention only where necessary for health and safety. Retain deadwood wherever possible.	Annual check for signs of disease or decay. Management intervention only where necessary for health and safety. Retain deadwood wherever possible.	Annual check for signs of disease or decay. Management intervention only where necessary for health and safety. Retain deadwood wherever possible.	Annual check for signs of disease or decay. Management intervention only where necessary for health and safety. Retain deadwood wherever possible.	Annual check for signs of disease or decay. Management intervention only where necessary for health and safety. Retain deadwood wherever possible.	Annual check for signs of disease or decay. Management intervention only where necessary for health and safety. Retain deadwood wherever possible.
Existing hedgerows	Rotational annual cut of alternate faces of each hedgerow in autumn or early winter.	Top and rotational annual cut of alternate faces of each hedgerow in autumn or early winter.	Rotational annual cut of alternate faces of each hedgerow in autumn or early winter.	Top and rotational annual cut of alternate faces of each hedgerow in autumn or early winter.	Rotational annual cut of alternate faces of each hedgerow in autumn or early winter.	Rotational annual cut of alternate faces of each hedgerow, and top on alternate years, in autumn or early winter.
Other prescriptions	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.

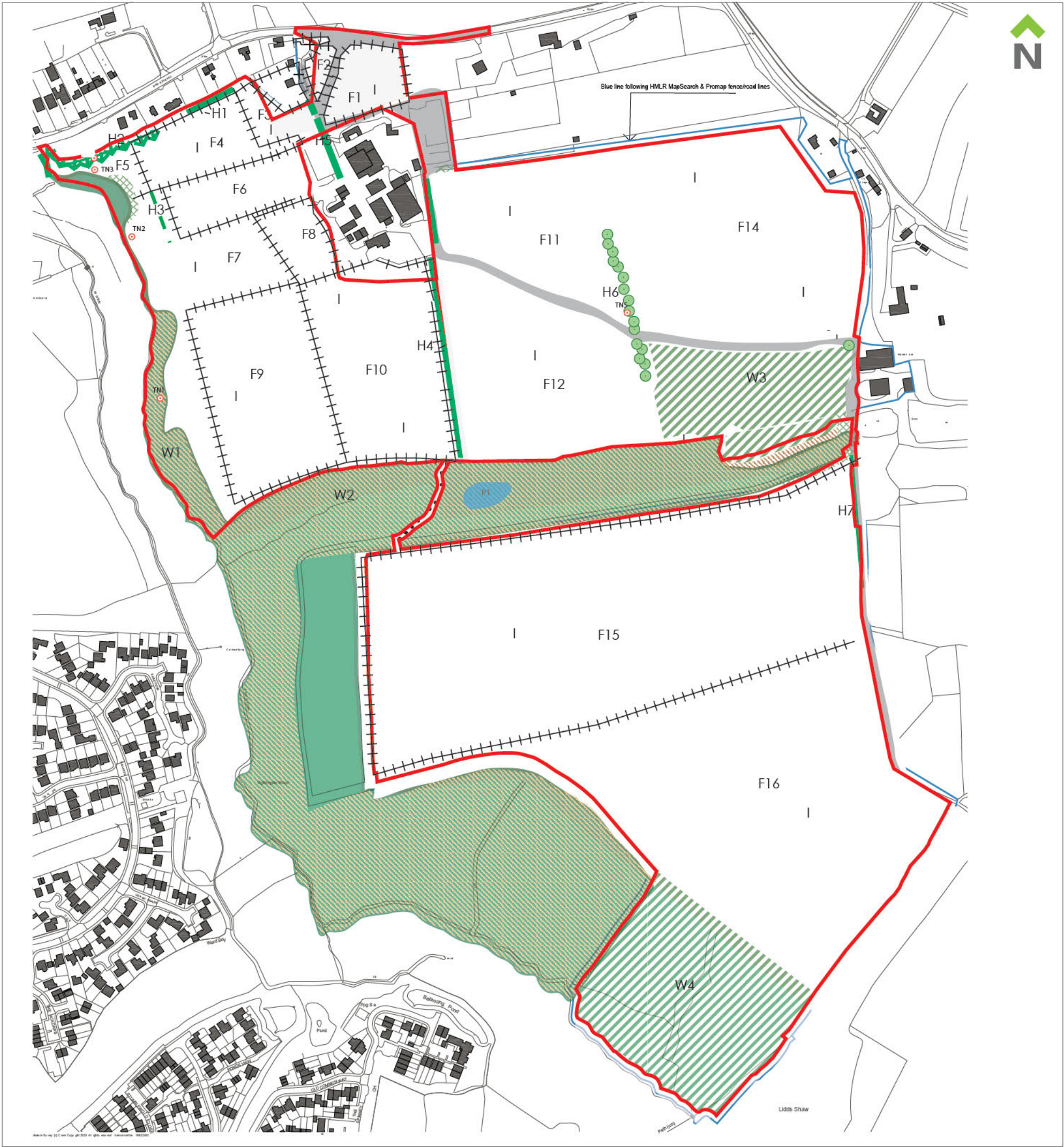
MANAGEMENT OF GRASSLAND HABITATS						
Area/Asset	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6 -10
Retained Meadow grass areas	Cease intense grazing and any chemical inputs in improved grassland areas to become long grass.	Annual cut to min 75mm in late August September. Leave arisings for 1-7 days before collecting to shed seed.	Annual cuts once a year to c. 150mm in August, with at least 25% left uncut. Leave arisings for 1-7 days before collecting to shed seed.	Annual cuts once a year to c. 150mm in August, with at least 25% left uncut. Leave arisings for 1-7 days before collecting to shed seed.	Annual cuts once a year to c. 150mm in August, with at least 25% left uncut. Leave arisings for 1-7 days before collecting to shed seed.	Annual cuts once a year to c. 150mm in August, with at least 25% left uncut. Leave arisings for 1-7 days before collecting to shed seed.
'Natural succession' areas	Cease intense grazing and any chemical inputs in improved grassland areas to become long grass.	Annual cuts once a year to c. 150mm in August, with at least 20% left uncut on rotation each year. Leave arisings for 1-7 days before collecting to shed seed.	Annual cuts once a year to c. 150mm in August, with at least 20% left uncut on rotation each year. Leave arisings for 1-7 days before collecting to shed seed.	Annual cuts once a year to c. 150mm in August, with at least 20% left uncut on rotation each year. Leave arisings for 1-7 days before collecting to shed seed.	Annual cuts once a year to c. 150mm in August, with at least 20% left uncut on rotation each year. Leave arisings for 1-7 days before collecting to shed seed.	Annual cuts once a year to c. 150mm in August, with at least 20% left uncut on rotation each year. Leave arisings for 1-7 days before collecting to shed seed.
Mown grass Paths	Cease intense grazing and any chemical inputs. Mow up to 5 times per year. Mow walking routes regularly as required to ensure they are clearly visible.	Mow up to 5 times per year. Mow walking routes regularly as required to ensure they are clearly visible.	Mow up to 5 times per year. Mow walking routes regularly as required to ensure they are clearly visible.	Mow up to 5 times per year. Mow walking routes regularly as required to ensure they are clearly visible.	Mow up to 5 times per year. Mow walking routes regularly as required to ensure they are clearly visible.	Mow up to 5 times per year. Mow walking routes regularly as required to ensure they are clearly visible.

Wildflower meadow	Spray off grassland to produce stale seed bed. Harrow / rake to a medium tilth, then roll during dry conditions. Seed and water, control aggressive weed growth by monthly hand-pulling or selective herbicide. Top regularly at 70-150mm, removing arisings.	Check regularly and re-sow failed patches. Cut in spring to remove excessive winter growth. Annual cut to c. 150mm in August. Leave arisings for 1-7 days before collecting to shed seed. Control aggressive weed growth by hand-pulling or selective herbicide. Mow walking routes fortnightly or as required to maintain c. 50mm sward.	Check regularly and re-sow failed patches. Cut in spring to remove excessive winter growth. Annual cut to c. 150mm in August. Leave arisings for 1-7 days before collecting to shed seed. Control aggressive weed growth by hand-pulling or selective herbicide. Mow walking routes fortnightly or as required to maintain c. 50mm sward.	Cut in spring to control excessive winter growth if required. Annual cut to c. 150mm in August. Leave arisings for 1-7 days before collecting to shed seed. Control aggressive weed growth by hand-pulling or selective herbicide. Mow walking routes fortnightly or as required to maintain c. 50mm sward.	Cut in spring to control excessive winter growth if required. Annual cut to c. 150mm in August. Leave arisings for 1-7 days before collecting to shed seed. Assess requirement for continued control of weed growth. Mow walking routes fortnightly or as required to maintain c. 50mm sward.	Cut in spring to control excessive winter growth if required. Annual cut to c. 150mm in August. Leave arisings for 1-7 days before collecting to shed seed. Control weed growth as appropriate. Mow walking routes fortnightly or as required to maintain c. 50mm sward.
Colonising scrub	n/a	Annual inspection of scrub cover. Control encroachment by up to 30% annually as necessary with an autumn cut. Do not reduce below 200mm.	Annual inspection of scrub cover. Control encroachment by up to 30% annually as necessary with an autumn cut. Do not reduce below 200mm.	Annual inspection of scrub cover. Control encroachment by up to 30% annually as necessary with an autumn cut. Do not reduce below 200mm.	Annual inspection of scrub cover. Control encroachment by up to 30% annually as necessary with an autumn cut. Do not reduce below 200mm.	Annual inspection of scrub cover. Control encroachment by up to 30% annually as necessary with an autumn cut. Do not reduce below 200mm.
Other prescriptions	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.

MANAGEMENT OF WATER BODIES AND DITCHES						
Area/Asset	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6 -10
New pond establishment	Excavate new wildlife pond and plant with aquatic vegetation.	n/a	Annual check of aquatic vegetation. Control to 25% in autumn if 50% cover is reached. Leave arisings on bank for 24hrs before removing.	Annual check of aquatic vegetation. Control to 25% in autumn if 50% cover is reached. Leave arisings on bank for 24hrs before removing.	Annual check of aquatic vegetation. Control to 25% in autumn if 50% cover is reached. Leave arisings on bank for 24hrs before removing.	Annual check of aquatic vegetation. Control to 25% in autumn if 50% cover is reached. Leave arisings on bank for 24hrs before removing.
Other prescriptions	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.	Remove litter encountered during routine management. Annual sweep for litter / discarded items during the winter.

Appendix A

Habitats Plan
CSA/2646/108/C



- Application Site Boundary
- Improved Grassland
- Ancient Woodland and Number
- Broadleaved Woodland
- Hn Hedgerow and Number

- Hardstanding
- Scrub
- Tall Ruderal Vegetation
- Pn Pond and Number
- Plantation Woodland

- Line of Trees
- Tn Target Notes
 - TN1- Bluebells in Woodland
 - TN2- Trees with woodpecker holes providing bat roost potential. Tree Creeper seen entering a woodpecker hole
 - TN3- Spoil/Log Piles
 - TN5- Barn Owl Sighting



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Project	Land at Bird in Eye Farm South of Bird in Eye Hill Uckfield	Date	April 2021	Drawing No.	CSA/2646/108
Drawing Title	Habitats Plan	Scale	See Bar	Rev	C
Client	Croudace Homes Limited and Mr & Mrs Berry	Drawn	TF	Checked	CC

Appendix B

Landscape Strategy and SANG Design Plan
CSA/2646/114/L

1. Public Open Space

The site benefits from approximately 75% being designed as public open space. Multi-functional green corridors, with new tree planting will break up the development parcels and provide a strong landscape framework for the new housing.

A key feature of the site is the green corridor, with planting designed to frame views of The Oast (Grade II Listed) within the Bird in the Eye Farm complex. A low cut hedgerow on the edge of the farm complex will allow for the building to the seen from within the public open space, while the green corridor will frame the views towards it, respecting its setting and enabling the building to continue to be seen from the higher parts of the town further to the west.



2. Strategic Suitable Alternative Natural Greenspace

A large area of land to the east and south of the new housing will be provided as a Strategic Suitable Alternative Natural Greenspace (SANG) providing a significant recreational resource adjoining the site and for the wider town. A car park within the area will allow for dogs to be off leads from the point they leave the car. A 2.7km circular walking route will be provided with secondary walking routes which link to the main one, offering users opportunities to vary their routes. The primary walking route will connect to public footpath Framfield 65b, which extends along the outside of the south eastern boundary of the Strategic SANG, opening the opportunity for access to the wider footpath network and longer walks. Planting within the Strategic SANG, including areas of woodland, trees and wildflowers, will draw the eye and add to the experience of the routes through the seasons. This new planting, as well as the establishment of a wildlife pond, will offer further biodiversity benefits and habitat creation.



3. Biodiversity Enhancements

The Site provides significant scope for a range of biodiversity enhancements to be delivered alongside the new development and Strategic SANG. New woodland and tree planting will strengthen existing habitat and maintain the ecological functionality of these features for dormice and foraging bats which have been recorded within the Site. New areas of wildflower planting will diversify the existing range of flora and provide new habitat for reptiles and invertebrates. In addition, the inclusion of dormouse nest boxes, bat boxes, bird boxes and the creation of log piles for reptiles will provide further opportunities for these species across the Site.



Consented Outline Application
WD/2010/2874/FE
146 dwellings and associated infrastructure

4. Retained Woodland and Trees

The site benefits from woodland and trees of high arboricultural and landscape quality, which are located on the boundaries. The vast majority of these can be protected, with some enhancements to provide further structure to the site.

Bird in the Eye Shaw, which bisects the site is a significant landscape feature, and will provide a mature backdrop to the development, as well as a sense of continuity, and of place. In addition, the woodland on the boundaries of the southern part of the SANG, including Nightingale Wood, will separate the walking routes from the new housing to the north, and indeed from the existing town to the west. Both Bird in the Eye Shaw and Nightingale Wood are designated as Ancient Woodland, and woodland margin planting and setting the development well back from the edge of Bird in the Eye Shaw will ensure their long term protection.



5. New Tree and Hedgerow Planting

Extensive native tree and hedgerow planting to be undertaken within the public open space to complement the well-wooded landscape character of the area and add to its wider green infrastructure. This will also provide opportunities for ecological enhancements.

Woodland margin planting on the northern edge of Bird in the Eye Shaw (Ancient Woodland) will provide planted protection to the woodland linking to the ecological corridors through the public open space of the development.

Street trees will be planted in the verges along the roads, and in the pocket parks to bring the benefits of green infrastructure into the centre of the development, in the form of improving air quality, providing wildlife refuges and assisting in absorbing surface water run-off.



6. Sustainable Drainage Features

Sustainable drainage basins to be located within the public open space. These basins will be planted with marginal plants which will offer enhanced ecological and habitat benefits.



7. Children's Play Provision

A LEAP (Locally Equipped Area for Play) will be located within public open space positioned centrally within the proposed residential area. This will allow easy access for residents. The LEAP will be designed in a 'rural style', incorporating timber elements of natural play befitting the settlement edge location of the Site. It will predominantly be aimed at younger children (up to 8 years) and will provide a range of play experiences and opportunities.



Proposed

Existing

Structural Tree Planting Mix
Woodland Margin Planting Mix
Thicket Mix
Proposed Street / POS Tree
Ornamental tree
Native hedge planting
Ornamental shrub / herbaceous ornamental grass planting

Wildflower and marginal planting in attenuation basin
Amenity grass
Longer grass
Wildflower meadow
Natural Succession
Wildlife Pond
Recreational footways
Proposed cycleway

Play areas - LEAP
Rustic Post and Rail Fencing
Timber seating
Dog waste bin

Strategic SANG walking routes
Primary walking route within mown grass paths
Secondary walking route with mown grass paths

CSA environmental
Dixons Barns, High Street, Ashwell, Hertfordshire SG7 5NT
01462 743647
cshwell@csaenvironmental.co.uk
csaenvironmental.co.uk
Project: Bird in the Eye Farm, Uckfield

Title Landscape Strategy & SANG Design
Client Croudace Homes Ltd.
Scale 1:1250 @ A0
Date April 2020
Drawing No. CSA/2646/114

Rev L
Checked JJ
Rev L

Appendix C

Wealden District Council SANG Criteria and Bird in Eye Farm Provision

Table 1. WDC SANG Criteria Assessment

SANG Criteria	Key Requirements	Bird in Eye SANG
Accessibility	<p>Unless SANGs are very small or only designed to serve development immediately adjacent it is assumed that some car parking provision will be required. Direct access to SANG from new residential sites is seen as a significant benefit, as are close with accessibility to existing settlement (i.e. within 400m).</p> <p>Car parking must be designed to be as accessible as possible and well signed from the road. There should be safe access from the car park into the SANG, with the ability to take dogs from the car park into the SANG off the lead.</p> <p>Car parks must be located sensitively within the surround land landscape.</p>	<p>A car park will be provided at the entrance to the SANG (providing direct access away from main roads), to be access via a link road through the Croudace Homes development.</p> <p>There is ample room to provide adequate parking to serve all development currently proposed and some further additional development locally. SANG access can be clearly sign posted from the B2102 and within the development areas.</p>
Size & Length of Walking Routes	<p>Circular walk of minimum 2.5km to be provided, which must start and finish at car park / access points.</p> <p>For larger sites a range of longer circular routes of varying lengths must be provided (c.4-8km).</p> <p>WDC do not specify an area calculation, although provision of c.40ha is quoted to achieve a 2.5km walk.</p> <p>During a telephone call between CSA and Marian Ashdown at Natural England on 16th March 2016 (as part of DAS consultation), it was indicated that Natural England will accept c.8ha SANG / 1000 residents as a minimum, but emphasis is really on quality of walking experience. It should be noted that WDC do not endorse this quantitative approach, with their focus being solely on quality and level of current usage / potential for enhancement to assess capacity.</p>	<p>Site has capacity to achieve a main walking route of c.2.7km across the whole SANG area, with further walking routes providing additional linkages and access through the Millennium Wood to the north of the stream. The main walking route will also provide a direct linkage to the public footpath network to the south, providing access to longer walks within the wider countryside.</p> <p>The area identified for SANG is c. 26.17ha, a significant area of land. Whilst this doesn't meet the c.40ha quoted within the WDC guidance it should be noted that c.28.9ha of SANG has been consented for up to 1000 new dwellings consented at Ridgewood Farm, Uckfield (Ref: WD/2015/0209/MEA); which has been adopted and is being implemented by WDC. The proposed SANG at BIE Farm would have more generous provision per dwelling than that consented at Ridgewood Farm.</p> <p>If the 8ha / 1000 residents was applied then SANG proposed would be well within this threshold as the 290 units proposed would only require</p>

		<p>c.5.57ha of SANG land being required for mitigation leaving a headroom capacity of c.15.6ha (based on unit occupancy of 2.4 residents / unit); providing an adequate walk length could be achieved.</p> <p>As such the level of SANG provision is considered to be generous.</p> <p>During previous consultations, Natural England stated that due to the limitation of the pre-existing 'pinch point' to the east of the ancient woodland as part of the main walking route, that the SANG should only provide capacity for both areas of the Bird in Eye Farm development (up to 600 units across both land to the south and land to the north of Bird in Eye Hill), however this has now been resolved, and further land included within the SANG area. As such, it is suggested that this would open up the potential for capacity for further schemes within the area.</p>
Paths, Roads & Tracks	<p>Paths must be easily used and well maintained; they should remain unsurfaced where possible but must be accessible all year round.</p> <p>Path routes must be designed to avoid safety concerns, i.e. should be open and avoid long stretches through enclosed woodland.</p> <p>Where possible, footpaths should be routed where views can be maximised.</p>	<p>To provide a SANG with a strong semi-natural character, un-surfaced footpaths will be provided, including through areas of wildflower meadow and newly planted woodland.</p> <p>There may be a need to consider provision of surface path / boardwalk in areas of lower ground which may suffer from poorer drainage. Drainage improvements could be provided in order to ensure that footpaths along the circular walk are fit for purpose at all times of year. It may be appropriate to lay woodchips in some localised sections.</p> <p>Path routes over high ground would provide key views to the south / south-west.</p> <p>The existing pathway through the ancient woodland (which includes</p>

		<p>a wooden bridge which would require upgrading, will be used as part of the main walking route to connect the northern and southern fields.</p> <p>The walking route will also be directed around the eastern side of the ancient woodland, where alterations to the existing bridge across the stream would be provided to separate vehicular and pedestrian routes (to allow vehicular access to the southern SANG fields for management.</p> <p>Vehicular access along the east of the ancient woodland and the southern SANG fields would need to be retained to allow access to the SANG for maintenance; however this would be in use infrequently. A new vehicular access along the northern boundary of the SANG (see the SANG Strategy Plan in Appendix B) connecting to the existing farm buildings will be required to allow access for the landowner. This access will be outside of the SANG area and will be screened by trees in relation to landscape and visual impacts.</p> <p>There is the potential for a new path to be created through the ancient woodland as an alternative option (see SANG Strategy Plan), however, the valley within the eastern section of the woodland is very steep and boggy and as such creation of a new access point is likely to be constrained to some degree.</p>
Artificial Infrastructure	<p>SANGs should be perceived as natural spaces without intrusion from artificial infrastructure, except within vicinity of car park. Visually sensitive way markers are acceptable.</p> <p>SANGs must be free from unpleasant visual, auditory or olfactory intrusions.</p>	<p>The car park would be set close to the area of residential development to the east, however the main area of the SANG is free from intrusion. The existing treeline south of the proposed car park area will be reinforced with additional trees and extended north and south, to include some screening around the car park to mitigate any landscape and visual impacts.</p> <p>No unpleasant intrusions are known of.</p>

Landscape & Vegetation	<p>SANG must seek to provide a rural and wild feel with a variety of habitats for visitors to experience (e.g. woodland, scrub, grassland, wetland and open water). Should include naturalistic open space, with inclusion of open water if possible.</p> <p>Where possible sites with undulating topography area desirable. Desirable to have a focal point, as such a view point or water features is desirable.</p>	<p>The proposed SANG site currently has a rural feel, being part of a farm, with the vast majority of surrounding land currently undeveloped and comprising agricultural land. Habitats currently present within the SANG include open grassland, plantation woodland, Ancient Woodland and Ridgewood Stream. A variety of new habitats could be delivered as part of the SANG scheme including new native woodland/ shrub planting, wildflower grassland and pond creation.</p> <p>The site gently slopes towards the south and west, providing view points from the north of the SANG fields across the south of the SANG and off-site rural land to the south and east.</p>
Restrictions on Usage	<p>Access within SANGs must largely be unrestricted with plenty of space for dogs to exercise freely and safely off the lead.</p>	<p>The SANG area is currently largely open and although some new planting will be incorporated, open spaces will be retained in order to allow dogs to exercise freely.</p> <p>The SANG area is not situated next to any busy roads so dogs can safely be let off of leads. Dog proof fencing can be provided where appropriate to avoid disturbance of stock in neighbouring fields.</p>
Advertising	<p>SANGs should be clearly sign posted or advertised to ensure that people know of their existence.</p> <p>Leaflets and websites should be provided to advertise SANG locations.</p>	<p>Signage, interpretation boards and a website could easily be provided to advertise, promote use of and educate the public regarding the SANG.</p>
Implementation	<p>It is common place that SANG must be delivered in full prior to the occupation of new residential development. It will be important to ensure that where enhancement works are required that these can be full established prior to this. Where large scale SANGs are proposed it may be possible to stage these works in line with a phased development approach.</p>	<p>It is anticipated that access and habitat creation / enhancement works will be required, and this will need to be in place in good time prior to first occupation of the Croudace Homes development. Funding for such works will be identified at an early stage.</p>
Management	<p>Management of SANGs in perpetuity must be detailed and secured (i.e. through legal agreement).</p>	<p>Consultation on ownership, management and funding arrangements is in progress with the Land Trust. Implementation of the SANG would be developer funded, with management contributions to be secured as part of planning obligations for the residential development proposed.</p>

Appendix D

Consultation Responses from Natural England

Date: 10 February 2020
Our ref: DAS/10886/302767



██████████
Ecologist
CSA Environmental

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

0300 060 3900

BY EMAIL ONLY

Dear ██████████,

Discretionary Advice Service (Charged Advice)
DAS 6106

Development proposal and location: Proposed Suitable Alternative Natural Greenspace (SANG) at land at Bird in Eye Farm, Bird in Eye Hill, Uckfield, East Sussex, TN22 5HA

Thank you for your consultation on the above which we received on 06 December 2019. Our apologies for the delay in being able to respond, which has been due to intense workload pressure on our team during this period.

This advice is being provided as part of Natural England's Discretionary Advice Service. CSA Environmental has asked Natural England to provide advice upon:

- The proposed use of an area as Suitable Alternative Natural Greenspace (SANG) in relation to proposed phased development at land at Bird in Eye Farm, Uckfield.
- Air quality impacts advice for the purposes of a shadow Habitats Regulations Assessment (HRA)

This advice is provided in accordance with the Quotation and Agreement dated 21 January 2020.

Natural England has provided previous DAS advice on this proposal in our letter dated 01 February 2019 (our ref DAS/10886/266614), 23 April 2019 (our ref DAS/10886/276420) and my follow-up email dated 10 May 2019.

The following advice is based upon the following documents and correspondence:

- 2646_03_Rev A_SANG Strategy Plan Briefing Note ISSUE (November 2019)
- Phone conversation with ~~Steve Gaddwell~~ on 27 January 2020
- Revised site plan as submitted by email to me from ~~██████████~~ of CSA Environmental, on 03 February 2020 (file name 20200203134107926)

No site visit was undertaken as part of this DAS agreement.

Protected sites – Ashdown Forest Special Protection Area (SPA)

Proposed Suitable Alternative Natural Greenspace (SANG)

This DAS advice relates to a proposed area for use as SANG, as avoidance mitigation for a proposed phased development of up to 700 dwellings at land at Bird in Eye Farm, Uckfield, in relation to recreational pressure on the Ashdown Forest SPA.

The proposed site for the housing and SANG is approximately 5.5km south of the Ashdown Forest SPA. The proposed SANG, as per the revised drawing, is approximately 24ha.

Ultimately, in order to ascertain the proposed development at land at Bird in Eye farm will not have an adverse effect on the integrity of the Ashdown Forest SPA from recreational pressure, the proposals will need to either:

- pay a sufficient financial contribution to the management of available strategic SANG; or
- provide sufficient bespoke SANG in line with agreed guidelines¹ as set out by Wealden District Council.

For both options, the proposals would also need to make the appropriate payment towards Strategic Access Management and Monitoring (SAMM) for Ashdown Forest SPA.

In my previous advice, as of May 2019, there were a number of issues regarding the quality of the SANG design, principally the pinchpoint in the circular path route between the two fields. To reflect this, I advised that Natural England may be able to accept the design including this pinchpoint if the SANG was only providing for the proposed 175 dwellings at Bird in Eye farm, and wouldn't be able to be used to offer extra visitor capacity to other separate developments. We also discussed issues concerning continued use of the southern part of the SANG by livestock grazing to still achieve good enough space for walkers and dogs to roam.

The SANG as depicted in the revised plan is made up of two main parts across the same two fields, immediately east of the proposed phase 1 and 2 of the development. I note the proposed development now has an increased quantum of 400 dwellings for phases 1 and 2, and a further 300 dwellings for phase 3 directly to the north. I also note the northern part of the SANG only occupies part of that field.

Overall, the SANG appears to have sufficient area to contain a circular path length of 2.5km, which is a key SANG requirement, along with scope for suitable design including habitat creation and enhancement. However the two fields continue to be connected only via the pinchpoint along the track, which remains a poor part of the overall design, and one which is not easily resolved unless more adjoining land is secured to expand the area.

During our phone call on 27 January 2020, we discussed SANG design and comparison with the Wealden DC strategic SANG at Owlsbury Park. The tunnel you referred to is an existing under road walkway and is the entrance to the SANG, so does not form an intrinsic part of the main circular path, and is therefore not regarded as a pinchpoint for that particular SANG.

Given the Bird in Eye proposed SANG design is not best practice in relation to the SANG criteria, I advise there is the potential for Natural England to accept the SANG on the basis that it only provides for the associated development at Bird in Eye farm (including phase 3 if appropriate pedestrian access to the SANG can be provided). Any headroom in capacity of the SANG (based on the 8ha/1000 population ratio) should not be released for other separate developments in the wider area, where visitors would need to travel to SANG.

¹ Wealden District Council (2018). *Guidelines for the Creation of Suitable Alternative Natural Green Space (SANGS)* <http://www.wealden.gov.uk/nmsruntime/saveasdialog.aspx?IID=13843&SID=3484>

In terms of other detailed comments on the SANG design, I strongly recommend a realistic main path route is planned which is not too convoluted, and reflects visitors' likely walking patterns which tend to be looser and more direct when walking around a site. Paths should avoid deep scalloped routes unless this is necessary to walk around certain features eg ponds.

It would also be useful to understand whether the track where the path incurs a pinchpoint would remain in vehicular use, and how frequently it would be used and by what type of vehicles, as this will have implications for pedestrian safety and overall suitability of the use of the site as SANG.

Habitats Regulations Assessment (HRA) – air quality

Given the situation regarding Wealden District Council's Local Plan, I advise you refer to Wealden DC on whether air quality modelling is required to inform the HRA. For instance, whether the council is using the previous Local Plan's housing delivery number as a proxy and if the Bird in Eye development falls within this figure, and whether it can therefore be concluded the proposals will not have an adverse effect on integrity of the SPA through air quality impacts alone or in combination – in which case there may not be a need for any detailed modelling.

Please refer to my previous DAS advice re long term management of the SANG, and biodiversity net gain.

I hope you find this letter helpful. For any points of clarification, or to arrange further advice, please contact me on 020802 68033.

This letter concludes Natural England's Advice within the Quotation and Agreement dated 21 January 2020.

Yours sincerely,



Sustainable Development Network
Sussex and Kent Team

cc commercialservices@naturalengland.org.uk

commercialservices@naturalengland.org.uk

As the Discretionary Advice Service is a new service, we would appreciate your feedback to help shape this service. We have attached a feedback form to this letter and would welcome any comments you might have about our service.

☒ The advice provided in this letter has been through Natural England's Quality Assurance process

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which will be made by Natural England acting corporately in its role as statutory consultee to the competent authority after an application has been submitted. The advice given is therefore not binding in any way and is provided without prejudice to the consideration of any statutory consultation response or decision which may be made by Natural England in due course. The final judgement on any proposals by

Natural England is reserved until an application is made and will be made on the information then available, including any modifications to the proposal made after receipt of discretionary advice. All pre-application advice is subject to review and revision in the light of changes in relevant considerations, including changes in relation to the facts, scientific knowledge/evidence, policy, guidance or law. Natural England will not accept any liability for the accuracy, adequacy or completeness of, nor will any express or implied warranty be given for, the advice. This exclusion does not extend to any fraudulent misrepresentation made by or on behalf of Natural England.

Annex 1

European Protected Species

A licence is required in order to carry out any works that involve certain activities such as capturing the animals, disturbance, or damaging or destroying their resting or breeding places. Note that damage or destruction of a breeding site or resting place is an absolute offence and unless the offences can be avoided (e.g. by timing the works appropriately), it should be licensed. In the first instance it is for the developer to decide whether a species licence will be needed. The developer may need to engage specialist advice in making this decision. A licence may be needed to carry out mitigation work as well as for impacts directly connected with a development. Further information can be found in Natural England's ['How to get a licence'](#) publication.

If the application requires planning permission, it is for the local planning authority to consider whether the permission would offend against Article 12(1) of the Habitats Directive, and if so, whether the application would be likely to receive a licence. This should be based on the advice Natural England provides at formal consultation on the likely impacts on favourable conservation status and Natural England's [guidance](#) on how the three tests (no alternative solutions, imperative reasons of overriding public interest and maintenance of favourable conservation status) are applied when considering licence applications.

Natural England's pre-submission Screening Service can screen application drafts prior to formal submission, whether or not the relevant planning permission is already in place. Screening will help applicants by making an assessment of whether the draft application is likely to meet licensing requirements, and, if necessary, provide specific guidance on how to address any shortfalls. The advice should help developers and ecological consultants to better manage the risks or costs they may face in having to wait until the formal submission stage after planning permission is secured, or in responding to requests for further information following an initial formal application.

The service will be available for new applications, resubmissions or modifications – depending on customer requirements. More information can be found on [Natural England's website](#).

[REDACTED]
[REDACTED]

From: [REDACTED]@naturalengland.org.uk>
Sent: 26 June 2020 12:09
To: [REDACTED]
Subject: RE: Phone Call

Hi [REDACTED] yes this is fine. I encourage you to discuss with Wealden DC, and you can approach NE for further advice but please note it is unlikely we can provide this until September onwards due to restrictions arising from coronavirus.

With many thanks and stay safe,

[REDACTED]
Senior Advisor
Sustainable Development network
Sussex & Kent team
Natural England
[REDACTED]
[REDACTED]

My current working days are Wednesday, Thursday and Friday

www.gov.uk/natural-england



During the current coronavirus situation, Natural England staff are working remotely to provide our services and support our customers and stakeholders. All offices and our Mail Hub are closed, so please send any documents by email or contact us by phone or email to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.

Natural England is accredited to the Cabinet Office Customer Service Excellence Standard

Natural England offers two chargeable services – The Discretionary Advice Service ([DAS](#)) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service ([PSS](#)) provides advice for protected species mitigation licence applications.

These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

From: [REDACTED] [mailto:[REDACTED]@csaenvironmental.co.uk]
Sent: 25 June 2020 11:28
To: [REDACTED] <[REDACTED]@naturalengland.org.uk>
Subject: Phone Call

Good morning [REDACTED]

It was really useful to speak to you quickly regarding Bird in Eye Farm on Tuesday so many thanks for your time as I appreciate you are probably very busy!

During the phone call we discussed the issues that were previously considered to be constraining factors to the suitability of the SANG (and as a result, its capacity), which have now been addressed as follows:

- The issue of the 'pinch point' within the walk route has now been resolved due to inclusion of the central 'finger of woodland' between the northern and southern fields within the SANG land and a full circular route of c. 2.8km is now achievable without constraint (and is not convoluted)
- The overall size of the SANG has now increased to 29.62ha and provides an extensive area for recreation without restrictions and is free from intrusions (the whole of the SANG site will be useable, with no areas retained for grazing etc as was previously the considered)

As these issues have now been resolved, you suggested that the capacity for the SANG could be based around the metric of 8ha/1000 units and that we should discuss this with Wealden to agree. I was hoping you could just sent a quick email confirming this, then we can discuss this with Wealden and agree what is deemed acceptable in terms of capacity?

Many thanks in advance,

[REDACTED]

[REDACTED] ACIEEM
Senior Ecologist



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urban design | ecology | landscape | heritage



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Appendix E

Letter of Intent from the Land Trust



15th April 2021

Emma Challenger
Croudace Homes Ltd
Croudace House
Tupwood Lane
Caterham
Surrey
CR3 6XQ

Dear Emma,

Subject to Board Approval

Subject to Contract

Re: Land Trust SANG provision and maintenance

Location: Land at Bird in Eye Farm, South of Bird in Eye Hill, Uckfield

Following our recent correspondence, discussions and site review concerning the Strategic Suitable Alternative Natural Greenspace (SANG) to be created at Land at Bird in Eye Farm, I am pleased to confirm that subject to Board approval, contract and payment of an agreed endowment, the Land Trust ('LT') is able to take formal ownership of the proposed SANG, being an area of approximately 26 hectares, and would thereafter remain responsible for its provision and maintenance in perpetuity - for the avoidance of doubt being a term no less than 80 years.

LT expects an unencumbered transfer with all SANG to be made available with the full endowment.

The site would be funded by the agreed in perpetuity endowment that would include for all management and maintenance, including the periodic capital replacement of site furniture and access infrastructure. The capital sum is ring fenced to the site and is invested in within LT's wider investment portfolio of over £160M.

Investment returns, assumed at 3.5%, are generated to fund the site management and delivery of LT's wider charitable objectives. The capital endowment is not spent and grows in line with inflation.

The site would be managed in accordance with a planning approved SANG Management Plan.

The SANG is considered to be of 'strategic' status as it contains more capacity than is required for the Land at Bird in Eye Farm development. This will enable other developments within a 5km catchment to acquire surplus capacity to help mitigate the impact of their developments on the Ashdown Forest SPA. LT is able to provide the current landowners the legal mechanism and structure, to allow LT to deliver the SANG in perpetuity and the current landowners to retain control over the allocation and sale of surplus capacity themselves.

This model is widely accepted by Local Planning Authorities such as Guildford Borough Council and Royal Borough of Windsor and Maidenhead.

LT is an independent Charity with influential partners, members and trustees. We manage open spaces on behalf of and in partnership with local communities. Our Key Principles and detail on our approach to site management are appended.

LT is leading the charge for cost effective solutions to deliver high quality and sustainably managed open space which preserves the character, value and benefits of our open spaces. LT supports people across the country to take control of their local green space.

We are highly experienced in every aspect of SANGs including:

- Identifying land
- Site design and management plans
- Reviewing third party designs and management plans
- Calculating capital works and in-perpetuity funding
- Project managing capital works
- Acquisition and in-perpetuity management

LT has a proven track record in managing land for the benefit of communities and wildlife. It has been approved by Natural England and a number of Local Planning Authorities as an appropriate body to manage SANG. The sites we manage includes 110 hectares of SANG land at Wellesley, Hampshire, 56 hectares of SANG land at Prince Philip Park, Hampshire and 26 hectares of strategic SANG land at Ash, Surrey.

The SANG at Wellesley is the largest in the country and has been established to deliver the recreational infrastructure to offset any negative impact on the Thames Basin Heaths Special Protection Area (SPA) and is part of the planning consent for the delivery of 3,850 new homes.

Ash Green Meadows is a 25 hectare strategic SANG in Surrey. The site was originally intended to transfer to Guildford Borough Council, however Bewley Homes Ltd undertook a Deed of Variation to the s106 to allow the land to be transferred to LT. Gifting the land to LT provided Bewley with a more cost effective funding model and allowed them to retain control over the sale of surplus capacity to third party developments.

LT acquired the site in September 2018 and has recently contributed towards a planning application that will see the site expand to the north thereby increasing strategic SANG capacity for the Borough. The success of Ash Green Meadows has meant that LT is now due to acquire five further strategic SANGs in Guildford covering over 100 hectares of land.

More information about LT, and the role we are undertaking at Wellesley Woodlands and Ash Green Meadows, can be found on the following web links:

<http://www.wellesleywoodlands.co.uk>

<https://thelandtrust.org.uk/space/wellesley-woodlands/>

<https://thelandtrust.org.uk/space/ash-green-meadows/>

LT's role at Bird in Eye Farm (South) SANG would be to manage the landscape as a recreational resource for residents to mitigate any negative impact that the possible increased footfall may have on the Ashdown Forest SPA.

LT will happily take part in discussions with Wealden District Council and Natural England concerning the subject SANG, if it is felt beneficial to the scheme. This could include a meeting with local partners, to discuss our planned role with ongoing management and maintenance of the land subject to transfer.

In response to any specific concerns regarding guarantees over long term security, funding management and the requirement for the Local Planning Authority, or other suitable body to have step-in rights, we can confirm the following would apply to the SANG at Land at Bird in Eye Farm (South).

Management Standards and Security of Investment

LT manages land specifically to deliver against its 5 Charitable Aims that include illustrating clear benefit to Environment, Education, Social Cohesion, Health and Local Economy.

Each transfer has to clearly illustrate sufficient opportunity to deliver against each of the LT's charitable objectives. If a site cannot provide a sound business case, the Board of Trustees will not approve the transfer of the land.

Risk Management

In order to avoid the situation where costs outstrip income, they will be monitored carefully and regularly against site and annual seasonal budgets. This will allow us to respond quickly to variations in income and expenditure and any other issues of concern. Other financial risk management measures include:

- The establishment of LT on a permanent basis was approved following a full appraisal in accordance with the HM Treasury 'green book' in 2010.
- The above appraisal reviewed LT's long term business plan underpinned by its core investment strategy.
- LT invests to achieve a real rate of return of 3.5% pa taking into account HMT and Bank of England guidance on long term investment returns.
- This rate of return is also in accordance with the HMT approved Best Practice Note on endowments agreed between HMT, MHCLG, and Homes England.
- LT currently has in excess of £160 million of investments, thus optimising returns.
- The endowment is not a commitment to spend and therefore most of the annual expenditure is discretionary.
- The agreements with our managing partners allow for downwards negotiations on annual site budgets.

Protection of assets

LT is a registered charity and as such it can only use its assets in furtherance of its charitable objects. At the heart of LT's charitable purpose is the maintenance of open areas for recreation within communities and this is the purpose for which LT uses gifted land. LT's trustees have a legal duty (arising from trust law) to use LT's assets solely in furtherance of its charitable objects and they cannot use its assets to further private benefit.

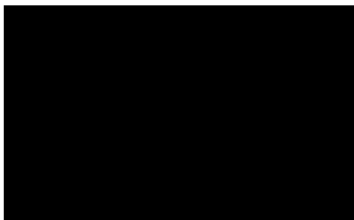
Article 5 of LT's Articles also provide that its assets will only be used for charitable purposes. If LT were to dissolve, its assets would pass to another organisation with similar charitable purposes by virtue of Article 8 of its Articles and as a matter of charity law.

Furthermore, as a registered charity, as well as a Company Limited by Guarantee, we are regulated by the Charity Commission, the Companies Act and other relevant legislation.

The investment model LT applies is based on management and maintenance costed from the return on investment. The whole of the principal capital sum is invested and we do not draw down on the capital. The endowment although invested as part of our overall investment portfolio, is ring fenced for the site it relates to, with the investment income used to deliver site management and LT's wider charitable aims.

With the risk management we apply to our investments, combined with the excellent track record we have in land management, we strongly believe that the transfer of land to LT provides partners with the best and most secure form of long term management, and negates the need for step-in rights.

Yours sincerely,



**Business Development Manager
Land Trust**

Appendix 1

Our key principles

We aim to deliver high standards of management on all our sites and this is an essential element of our land management strategy.

Our work is guided by the following key principles:

- i. A guarantee that the land is managed properly to an agreed standard i.e. the management plan
- ii. That we protect the original investment made in creating the open space and ensure it has a permanent and positive effect on the economy and environment of the local area
- iii. That we create long-term relationships with landowners, businesses, the wider community and other agencies devoted to land management and sustainability
- iv. That we find sustainable funding solutions in order to guarantee long term maintenance in line with established management plans
- v. That we host educational events and activities that promote healthier lifestyles
- vi. That we leverage additional funding options
- vii. That we actively manage the land in a way that significantly reduces incidents of anti-social behaviour
- viii. That we provide landscape conservation which enriches biodiversity and protected species.

Site Management

At a local level, LT identifies and appoints an appropriate local organisation to act as Managing Partner and to manage the site on behalf of ourselves and the local community. The benefits for communities are twofold: they can enjoy the local expertise, activities and events offered by the on-site ranger team; and be safe in the knowledge that the managing agents are fully accountable to LT to deliver the outputs outlined in the Management Agreement.

The Management Plan is the key safeguard to ensure the site is managed in accordance with planning. This document is appended to the Management Agreement between LT and the Managing Partner, outlining specific aims and objectives for site maintenance, environmental improvements and community involvement. The agreement is set for a 10-year period to ensure longevity but the Management Plan is reviewed regularly to provide comfort that the partnership is delivering their commitments and the community is receiving the outputs it can expect.

Managing Partners provide detailed quarterly performance reports and the Management Plan and contract is reviewed annually. This management process gives the current landowner, funder and other stakeholders assurance that the site and the investment within it is being well managed.



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