

CHAPTER 6 NATURAL ENVIRONMENT	
POLICY NE1	Biodiversity, Geodiversity and Nature Recovery
Q22 a) Do you agree?	No.
b) Anything else that needs changing?	<p>Please cross reference with SS10.</p> <p>Para 6.10 more protection of the NRN and LNRS and the NPPF 185 habitats, geodiversity, biodiversity, ecologically rich wildlife corridors (adding links to designated habitats ). The NRN and LNRS must hold significant weight .</p> <p>Para 6.11 - Uckfield does not support boundary reviews if it decreases any of Uckfield's important role in nature recovery capacity to halt species decline before 2030, especially as the rangers work hard to support national nature recovery objectives and we have protected designated sites. The BOA in Uckfield is incredibly important supporting international, national, county and local designations and a rare peat fed lake and restorable heath and acid grasses in the mosaic of habitats. Uckfield parish is responsible for some very Nationally and Internationally important species and landscapes including an arc supporting Barbastelle bats and Myotis sp. As identified by Surrey Wildlife Trust , Uckfield will therefore not support any changes of BOA affecting connections to Ashdown Forest, unless increasing BOA across Wealden and avoiding any fragmentation of these. A suggested boundary review is therefore concerning as this has not been provided in the consultation for public assessment in this process, therefore the 2017 GI and May 2022 Landscape Character Assessments and NCA121 and NCA122 apply - BOA should only be INCREASED and an additional link added to link the North Uckfield arc (including Shortbridge Stream to the Forest and Lake Wood LWS LGS to Buxted BOA SSSI ) linking Heathfield and Ashdown Forest to the Pevensy / Cuckmere BOA and headwater catchment of the Cuckmere included - linking The Ouse, Shortbridge Stream River and the Cuckmere - The North Uckfield arc between Shortbridge Stream linking Ashdown Forest to Lake Wood and Budletts IUCN red list water migration species, linking to Buxted SSSI must remain in any BOA reviews outside this consultation - as described by Dr Martyn Stenning and his decades of specialist work in ecology and conservation, supporting and working with others creating a wildlife rich corridor network linking a Northern arc between Uckfield and Buxted and round to Uckfield again - linking Uckfield town council West Park LNR LGS round to Buxted round to Uckfield TC Hempstead Meadows LWS and of course Lake Wood and the High Weald landscape and geodiversity linking to AF and North Uckfield. Thus, this nature arc meets every credential of the Local Nature Recovery Strategy linked to Ashdown Forest and Buxted SSSI. We support increasing and protecting the Uckfield BOA and expanding it.</p> <p>No BOA areas are removed where it is connecting Ashdown Forest and Uckfield, all incredibly sensitive. Leading National Landscapes and nature recovery, unless the boundary reviews are increasing and maintaining existing Ashdown Forest BOA through North Uckfield to Buxted.</p> <p>A new BOA is requested in honour of Ashdown Forest and James Adler linking Ashdown Forest down to Pevensy/Cuckmere. Wildlife corridors take precedence halting species decline before 2030</p> <p>A new initiative to protect the boundaries of SSSI = 400m see MAGIC maps purple lines / zones</p> <p>Para 6.12 LNRS / NRN should have more weight in the plan and added to the buffers of connectivity to avoid fragmentation. LNRS and NRN is a material consideration and holds the most weight possible in planning, this paragraph is a weak and needs improvement representation of policy by national government, Nature Recovery takes precedence as one of the most nature depleted country , NPPF 2.8 environment and NPPF 15 - corridors will also be protected in the plan period such as Weald to Waves, Sussex Wildlife Trust will be</p>

protected as their work has already identified key aspects of nature recovery evidence based and ask the plan supports Landscapes led Nature recovery.

Para 6.18 BNG remains on site and within the parish impacted

Para 6.19 Better protection of GBI corridors as identified in NPPF 185 . Independent Group asked for accessible by Active Travel Nature Reserves (not SANGS with drive car parks adding to burden of traffic)

SANGS should not use sites of high nature conservation value, LEW or AW (find a home for this as important in methodology) should be excluded from site calculation due to impact of numbers of visitors.

Landscape

Para 6.22 needs to add NCA121 Low Weald , NCA122 High Weald and its maps WDC have excluded the North Uckfield being in the National Character Landscape of the High Weald in map NCA122, , NCA124 Pevensey as Natural England evidence of aspects needed in this plan. There are important references in this material to be considered in ANY site selection

Para 6.31 more protection for HPI and SPI is needed in this plan and these important habitats AVOIDED , again NPPF para 185 applies. As does LNRS and NRN adding 500,000 ha to additional designations , we want that added in additional buffers. Additionally, Sussex Rare and Notable Species as advised by Sussex Biodiversity Record Centre, Sussex Wildlife Trust, Sussex Bat Conservation Trust, NBN Atlas Records , BTO/Sussex Ornithology Society Sussex Birds will receive weight in planning. Rare species habitats will be conserved and protected, restoration and connected landscape provides nature recovery

6.35 We would like more AVOIDED sites to less sensitive sites, mitigation hierarchy must not fragment habitats or woodlands or the woodland improvement priority habitats to be added to protections. We've not seen any sites AVOID

6.38 change the word 'can' to 'WILL'

6.39 Development proposals change word to include 'WILL HAVE REGARD'

See also LEEDS regulation 19 to BNG wording cross referencing

6.40 we need stronger protection of AVOID hierarchy because no site has offered to avoid

6.41 needs improving to strengthen policy in the local plan to protect the NPPF 185, NRN , Buffers and LNRS strategies

Policy NE1 needs improving as above and as SS10 response with the references as additional evidence

This section favours development not nature recovery and weight of loss needs to be halted and restored

Nature Recovery

6. Site selection will review the LNRS and NRN and protect wildlife-rich corridors. 'Where this is not possible' REMOVE THESE WORDS, NATURE RECOVERY HALTING SPECIES DECLINE is a national priority by 2030. Also each parish is given 30 x 30 % to protect GBI in each parish local decision. Protected GBI as per policy government objectives in addition to designated assets meeting NRN objectives to expand protected habitats.

Site clearance will be avoided and baseline is January 2020 for BNG and all trees, woodland and designated Habitats. All habitats removed prior to application, will be protected and all restored , no development as a penalty of pre-clearance. Uckfield has seen sites cleared followed by applications. We want this to stop Natural Regeneration of woodland will be protected in the boundaries - eg trees older than 20-30 years especially oaks and scrub supporting habitats.

Buffers in NE1 will be improved and strengthened for all habitats identified by maps of DEFRA , NE, Surface Water in habitats, Forestry Commission

400m SSSI

	<p>100m Ghylls and wet woodlands  50m preferably 100m AW - see email - to protect functional connectivity between habitats as per image  At least 100m on Woodland Trust and Forestry Commission sites  At least 400m for Sussex notable rare species and rare bats will have corridors of habitats and core sustenance zones  HPI and SPI will be protected and Sussex rare Wildlife ,  Buffers added to Priority Habitats  In Biodiversity NFI and its woodland priority improvement will be protected for restoration of woodland habitats  All habitats combined will be protected, including enhancement zones conserved, as defined by the Natural England methodology and mapping services  Buffers will be protected to restore functionality and connectivity between habitats  Blue Infrastructure will be protected and larger buffers at least 10m but preference 25m and all water catchment areas will be protected to prevent surface water and groundwater from contamination , catchments of the rivers on pg. 38 will be further protected in NE1 and the water environment. Water Framework will be initiated in NE1 and water policies. Good ecological condition of water will be implemented in NE1 and Water environment as these impact the HPI and SPI  IUCN species in Wealden will also be in protected corridors / environments  Add at least 30m on LEW Long Established Woodlands Defra Keepers of our time  Review Kent making space for nature evidence portfolio where matches Sussex habitats -  MS4N released information last week. ADD  Barnsley ADD  Oxfordshire priority habitats ADD  Corridors of wildlife rich habitats have the most weight described in plan making</p> <p>LiDAR Maps should be used to support conservation of geodiversity Corridors as NPPF 185 geodiversity wildlife corridors states, NCA122 etc, with surface water maps to identify unregistered important corridors and ecology stepping stones  A geodiversity action plan GAP should be included in BOA</p>
c) Have they missed anything?	-
<b>POLICY NE2</b>	<b>Biodiversity Net Gain</b>
Q23 a) Do you agree?	No.
b) Is the policy correct to require a blanket minimum 20% BNG requirement across the district or should distinctions be made i.e. higher % requirement when sites are within BOAs or other designated sites? Or should the Council have a	20% for sites incorporating bigger buffers (and to be cross referenced with SS10 and Q22).

lower or higher than 20% BNG target? Please explain your answer.	
c) Anything else that needs changing?	<p>Yes.</p> <p>Add - all buffers and BNG , woodlands etc will be planned and protected with Conservation Covenants in perpetuity as these are for offsetting development and nature recovery</p> <ul style="list-style-type: none"> <li>• Yes, improve - see below and ask Sussex Nature Partnership for Additionality terms etc</li> <li>• Additionality will not be included in the % net gain (providing areas for existing species) find Sussex Nature Partnership description</li> <li>• Net gain is not achievable where there is harm or loss to ancient woodland and irreplaceable habitats</li> <li>• The baseline for net gain is from January 2020</li> <li>• The biodiversity record centre, nbn atlas, bto, bat records etc included in assessments reviewed for species the habitats supported for species restoration and Nature Recovery- local knowledge will also be considered for Sussex Rare species where evidence shows not on databases</li> <li>• Developers surveys will be added to record centres with immediate effect as part of the halting species decline in Wealden, species records are essential to halting decline by 2030</li> <li>• Ancient woodland ground flora of more than 4-6 species will be reviewed as the irreplaceable Habitats records are provisional and former open space may be part of AW or LEW and the soil indicators need protection and conservation in supplementary, landscape led Designs (Francis Rose 1999 and Rackham?)</li> </ul>
d) Have they missed anything?	
<b>POLICY NE3</b>	<b>Woodland, Trees and Hedgerow</b>
Q24 a) Do you agree?	No, as it needs strengthening further.
b) Are the thresholds for tree provision, to increase tree cover, set out in point 7 appropriate? Please explain your answer	We are concerned that the loss of existing trees should even be considered. The design of a site shouldn't be about layout/numbers of dwellings etc. it should be about protecting and enhancing what is there over any point of trees or indeed hedgerows being proposed to be taken out.
c) Should the policy look to set a minimum buffer for protecting woodland and trees? Please note there is a separate policy for Ancient Woodland and Veteran Trees below. Please explain your answer	Yes. There must be buffers. Ideally these need to be a minimum of 50m to show that this plan is seriously protecting existing woodland as 6.1 details how unique we are as a district and its greatest resources. To have these buffers will also ensure than inappropriate management doesn't occur along with protection of RPA's and future RPAS as the tree or hedgerow continues to grow. It will also protect the forna/flora within the area.

<p>d) Should they change anything?</p>	<p>1. It needs buffers and protection zones included!</p> <p>2. We need these new areas to be protected by policy to ensure flora and fauna can thrive. They also need protection from the likes of footfall, fly tipping, and inappropriate management.</p> <p>3. We do not agree that existing woodland should be integrated into the design if 2) above is a factor</p> <p>4. Like this one with a caveat that if an existing Public Rights of Way (PROW) crosses the site and it's been across a green infrastructure area then the PROW needs to have either the existing green area kept or planted to give a green feel.</p> <p>5. Yes. Everything new or existing needs to be protected for the lifetime of the development</p> <p>7. Every single option should be taken to ensure trees are not lost, particularly to support Wealden DC's climate change objectives. I think this is covered but needs reiteration.</p> <p>6.74 please change/amend Woodland, trees and hedgerows - they are and make a valuable contribution</p> <p>6.75 last sentence. It states that increasing woodland cover by 12% across England by 2060 is deliverable. This is a good thing however it takes a sapling almost 20 years to grow so it can start to store/mitigate carbon. Tree council state that it takes two years to form anchor roots We are still seeing specimen trees deliberately damaged or removed for development. A perfectly healthy large oak tree was completely felled adjacent to the entrance to the new development off Mallards Drive, Uckfield which is heartbreaking. A further oak tree was deliberately cut on London road just past Blue Asia Restaurant to cause death. We have also seen criminal action, and enforcement by the Forestry Commission following the mass felling of trees off Eastbourne Road. Policy 7 covers the loss of trees through development. It says an appropriate number if replacement tree, in terms of species and size. It will exceed that which is lost will be required to be planted on site at appropriate locations. These 'restocked' trees need to be double protected to ensure they grow (good maintenance) and they won't be impeded.</p> <p>6.79 . We need to ensure Wealden DC review the size of their tree officer resource to enforce these policies.</p> <p>6.88 should the forestry commissions new mapping system also be listed?</p>
<p><b>POLICY NE4</b></p>	<p><b>Ancient Woodlands and Veteran trees</b></p>
<p>Q25 a) Do you agree?</p>	
<p>b) Should the policy set a minimum buffer zone to protect ancient woodland?</p>	
<p>c) Do you agree our approach should expect deeper buffers on sloping sites, land with ghyll streams or where woodland is a remaining fragment from a long removed historic block of ancient woodland?</p>	

d) Should the policy leave the determination of a buffer zone, to protect ancient woodland from development, to a case-by-case basis?	
e) Should anything be changed?	
f) Have they missed anything?	
<b>POLICY NE5</b>	<b>Ashdown Forest SPA</b>
Q26 a) Do you agree?	
b) Should anything be changed?	
c) Have they missed anything?	
<b>POLICY NE6</b>	<b>Landscape Character</b>
Q27 a) Do you agree?	
b) Have all of the landscape elements which development could have an impact on, either alone or cumulatively with other development, been identified at point 3 of the policy?	
c) Should anything be changed?	
d) Have they missed anything?	
<b>POLICY NE7</b>	<b>High Weald National Landscape</b>
Q28 a) Do you agree?	
b) Should anything be changed?	
c) Have they missed anything?	
<b>POLICY NE8</b>	<b>South Downs Park – not relevant</b>
<b>POLICY NE9</b>	<b>Agricultural land</b>

Q30 a) Do you agree?	No.
b) Should anything be changed?	<p>Policy 1. At this stage we cannot agree with this policy but not through the wording of it, but through the data gathering side of it. This policy is using the ALC grading, however I do not agree with the NPPF using the ALC agricultural land Classifications to grade the land.</p> <p>As mentioned in the early part of this draft plan, Wealden has many hectares of pasture land. The reason for this is because through hundreds of years of farming this area “we” have learnt that pasture/grazing suits our land and this is essential in the production of meat foods. The underlying geology, hydro geology, clay and rock levels has ensured most of the land has stayed as pasture land. Just because land cannot be used to grow crops doesn’t make it any less “Best and most versatile BMV) than land that is ploughed to grow crops. Local knowledge can provide this information.</p> <p>Also we know that grazing is an essential way of maintaining land habitats and flora varieties. This can be seen within the conservation of the Ashdown Forest, the Knepp estate to name but two.</p> <p>So how can we classify what is a high quality land when considering it for development as per the ALC grading.</p> <p>Much of our lands haven’t been ploughed and are surrounded by ancient/veteran trees and hedgerows which haven’t been damaged during ploughing hence they are still around so how can we classify what is poor land.</p> <p>All land has an economic and natural part to play in our eco systems. How can it be poor if it’s been non grazed / used for a number of years and be declared poor? It is still a green field, with much growing and living in it. It’s just unused not poor!</p> <p>So going back to policy 1, where it finishes saying “when determining quality’, applicants should take account of the agricultural lands value in terms of its contribution to food protection and wider ecosystems services and natural capital</p> <p>Policy 2 No. assumptions should not be made. Each site needs a study, however it has to be from a non biased source. i.e. not the developer and should not refer to ALC methodology as per my above comments! I know the NPPF can’t be changed. I just want points raised and considered and if possible policy modified.</p>
c) Have they missed anything?	
<b>POLICY NE10</b>	<b>Light pollution and dark skies</b>
Q31 a) Do you agree?	No.
b) Should anything be changed?	<p>One point missing. As a mainly rural district and neighbouring the South Downs and local nature and wildlife reserves including Ashdown Forest SPA a dark skies policy is essential to protect nocturnal wildlife, our eco systems flora and fauna and to protect human biology and sleep.</p> <p>We would therefore emphasise that it is essential to have a policy in place.</p> <p>6.152 does not go far enough in the protection of woodland habitats and there should be NO light overspill into these sensitive area and all bat roosts and foraging/commuting routes should be undisturbed by light pollution.</p>

	<p>Apart from that, the policy seems robust in making developers consider the visual impact to landscape and surrounding areas by light pollution and 6.153 makes the justification and mitigation of light use at the outset of the development/planning stage which is positive.</p>
c) Have they missed anything?	
<b>POLICY NE11</b>	<b>Noise pollution</b>
Q32 a) Do you agree?	
b) Should anything be changed?	
c) Have they missed anything?	
<b>POLICY NE12</b>	<b>Air quality</b>
Q33 a) Do you agree?	
b) Should anything be changed?	
c) Have they missed anything?	
<b>POLICY NE13</b>	<b>Water environment and water infrastructure</b>
Q34 a) Do you agree?	Yes.
b) Should anything be changed?	<p>It is hard to argue with the content of this section. It sets out some very valid points.</p> <p>Protection of water quality is a vital aspect and should be paramount for the benefit of all species, not just humans. But, disturbance to the water table must be avoided.</p> <p>We have experienced the flowing of new spring heads in local areas which have likely been the result of developments changing the hydraulic dynamics of the ground.</p> <p>It is good to see mention of the need to link proposed developments to the public sewer system. The provision of so-called “package treatment works” by some developers has been fraught with issues of ongoing private management and maintenance and I would suggest their avoidance at all costs.</p> <p>It is refreshing to see reference to an expectation for waterway and water quality improvement linked to development.</p> <p>Perhaps a greater emphasis upon pollution capture to prevent its impact upon water courses could be included. Traps and filtration could also be included in development to a greater degree.</p> <p>Perhaps a greater emphasis upon pollution capture to prevent its impact upon water courses could be included. Traps and filtration could also be included in development to a greater degree.</p>

<p>c) Have they missed anything?</p>	<p>On the whole, the policy does a reasonable job of stating the council’s commitment to protecting and enhancing water quality, but in terms of this precious natural resource, you can’t have too much of a good thing, so any further strengthening of this standard must be encouraged and supported.</p> <p>We are being advised by the Rivers Trust that sewage capacity in the Buxted, Uckfield , Maresfield , Halland , Framfield area is not meeting good ecological condition and they are seeing species collapse in water courses.</p> <p>Our rivers need to be restored to good ecological condition:  <a href="https://www.arcgis.com/apps/mapviewer/index.html?layers=befb443e57404e9b8707cddf28c56eca">https://www.arcgis.com/apps/mapviewer/index.html?layers=befb443e57404e9b8707cddf28c56eca</a> catchment map</p> <p>We are particularly concerned about waterways and important catchments connected to the Shortbridge Stream and associated wildlife corridor (fish migration, endangered water based species, water mammals, restoration connected to Ashdown Forest, and Buxted SSSI to the Uck). Shortbridge Stream is under a Water Framework Directive, and salmonid and cyprinid catchment area to the north west of Uckfield. If you review the wetland Uckfield priority habitats on ARCGIS surface water mapping, you'll see that the vast majority of the northern section of Uckfield is shaded as priority habitat, due to the connection to Shortbridge stream and associated wet woodlands, and green and blue corridor in that area.</p> <p>More protection and conservation of water, surface water and groundwater is needed, particularly in floodplains and low lying areas.</p>
<p><b>POLICY NE14</b></p>	<p><b>Contaminated land – chose not to respond to this section</b></p>