



05/08/2022

RE WD/2022/1610/MAO

Dear Sir or Madam,

I write to comment on the planning application WD-2021-1285-MAO. I am opposed to this application.

I am a professional Ecologist and a professional member of CIEEM. I am also Chartered Landscape Architect registered with The Landscape Institute, with some 35 years professional experience.

I note that Polly Canning seems to have conducted the Biodiversity Net Gain calculation. Mrs Polly Canning BA(Hons) MA MRTPI is an Associate Planner at Kember Loudon Williams, and therefore not an ecologist. Therefore, she is not qualified to undertake this Net Gain Calculation which is a complicated piece of work, even for a very experienced and qualified ecologist. Further, her work is not impartial; as she is acting as a planner for the client in this instance. The Net Gain calculation is also highly unlikely to be a massive increase of 179.38% habitat units, and 49.38% for hedgerow units. Has the mature, established, historic and connected nature of the proposed removal of mature hedgerow and grassland pastoral habitats been considered?

In my previous letter on the previous application, I wrote that; "The grassland of the site has Sweet Vernal grass. This is an indicator of old pasture. It has certainly been grassland since we moved to Wadhurst 26 years ago. Along the old hedgerow, which is raised high above the Cousley Wood Road, this historic hedgerow has other old pasture indicators such as Common Sorrel and Meadow Vetchling. There are only a few sites in Wadhurst where I have seen these species in the hedgerows surrounding old pastures. This would be lost. "

The loss of landscape character would have a detrimental impact on the High Weald AONB, which is a medieval landscape, and historic pasture. That would be thus contrary to the High Weald AONB Management Plan aims. Visitors come to walk in the area, catching the train from London for the day, for just such a view of sheep grazing old pasture. The field is visible in the Landscape setting of Wadhurst from Blacksmiths Lane and Cousley Wood Road. Erasing of landscape character through loss of open views across historic pasture from Cousley Wood Road cannot "conserve and enhance" the landscape, and thus fails the "acid test" requirement for proposals to conserve and enhance the protected AONB landscape.

This application does little to address that loss of character and instead has an access road through an old hedgerow and species rich grassland verge as well as loss of hedge bank. This is thus contrary to the NPPF landscape and biodiversity clauses as well as to Local Plan policy on conserving and enhancing key features within an AONB landscape and its biodiversity. The High Weald AONB Management Plan also resists loss of key feature which add landscape character and developments like this one, which fragment historic rural landscape settings, cannot be said to contribute towards conserving or enhancing character.

In my previous letter I wrote, "My husband and I have recorded: a GCN near to Wadhurst High Street, to west of site, as well as a pond with 36 toads in Sparrows Green, also within the study area of the PEA, to name just a few recent biodiversity records sent into SxBRC. These records are important. The whole PEA report therefore needs updating to take account of recently observed protected species including amphibians within at least 1 Km of the site." There are breeding pond/s and suitable foraging links to the green field via hedgerows and scrub, as well as ghyll woodland and stream, providing foraging habitats for GCN with good connectivity to this field of old pasture. It is thus likely that GCN have used these fields for years during their foraging stages. Have these habitats been accurately assessed for the PEA mitigation/ enhancements and the Biodiversity Net Gain calculations? The breeding pond/s with GCN are within 500 metres of the site, but these were not surveyed or accessed by the ecologists doing the PEA. Adequate herptile data is not thus available to assess the biodiversity calculations for this site, and appropriate mitigation is to be also unlikely to be adequate to address the adverse impacts on the favourable nature conservation status of protected species on this site, with knock on effects for populations of GCN and other amphibians. This applies to reptiles such as Slow worm, and Grass Snake too, which are likely to be present and to forage in the habitats connected to this green field of pasture.

In Para 5.6 It is considered that no Impacts from habitat loss, isolation or fragmentation would occur; this is plainly not true.

I know from years of recording species that slight changes such as loss of hedgerow, loss of fields of pasture, and introduction of amenity grassland, can have immediate effects on species such as slow worm. Building this new housing on this field of old pasture in this location will be likely to bring adverse impacts on available connected green habitat for species such as Slow worm. Creating a break in a hedge can be very detrimental to such species which use green corridors including road verges for safe passage. The development will also lead to loss of habitat connectivity for protected species such as Hazel Dormice.

Predation by domestic cats will also increase due to cat ownership of the new house holders. There will thus be impacts on protected species including Hazel Dormice (which are known to be present), GCN and other newts, slow worms, frogs, lizards, and toads. The report does not offer mitigation for this adverse impact from domestic cats.

[REDACTED]

It is a misleading to say that the field is heavily grazed in general, (Para 4.7). I would say that it has been traditionally grazed by sheep over the years, certainly since I have lived in Wadhurst. This field is part of the landscape character of the village setting, which is rural, and it is a high value landscape in the AONB. Grazing by sheep is an appropriate form of traditional landscape management and grazing is linked to higher species richness of grassland.

Para 2.10, of the Wealden District Local Plan states:

"2.10. The richness and diversity of its biodiversity, landscape and heritage are significant

factors in making the District such a desirable place in which to live. This coupled with a limited legacy of brownfield land places additional pressures on the abundant supply of greenfield land. Our Core Strategy needs to ensure that the growth required to meet needs make the best use of resources without compromising future requirements, and makes an overall positive contribution to the environment where possible. Working in partnership to manage our natural resources is crucial, ensuring that the attractiveness of the resource is not diminished through uncontrolled visitor pressure or development.”

Further SPO1 states:

“SPO1 We will help manage countryside resources and assist in the development of the rural economy whilst protecting and enhancing recognised biodiversity and geodiversity attributes, we will protect the internationally important sites of the Pevensey Levels and Ashdown Forest and other designated areas of bio and geodiversity. We will also protect, and will work with others to enhance and manage, the distinct landscapes of the District, particularly, but not exclusively, those nationally designated.”

In Para 7.20 of the Core Strategy, it states.

“The Council acknowledge the importance of protected species and species of principal importance and its role in seeking to enhance and promote their wellbeing through the protection, enhancement, restoration and creation of their associated habitats. For this reason, development proposals must be informed by up-to-date information about biodiversity that may be affected. Furthermore, guidance requires an approach of seeking to avoid significant harm to biodiversity and geological interests before considering adequate mitigation measures or lastly seeking appropriate compensation measures.”

The development would fail to conserve and enhance the High Weald AONB for the above reasons, which is contrary to NPPF paragraph 176 and High Weald AONB Management Plan objectives S2, FH2 and OQ4.

Yours sincerely,

Charmaine Noel.

BA (Hons), MSc, MCIEEM, CMLI.