

**SEDLSCOMBE NEIGHBOURHOOD PLAN
2016-2028**

**FINAL LOCAL GREEN SPACE
REPORT**



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Introduction

The Submission version of the Sedlescombe Neighbourhood Plan includes Policy 11, which proposes the designation of two parcels of land on the edge of Sedlescombe village – at Street Farm and Red Barn Field - as Local Green Spaces, in accordance with Paragraphs 76-77 of the National Planning Policy Framework (NPPF).

The supporting text to the policy includes an outline of the justification for the proposals. The purpose of this separate report in the evidence base of the Neighbourhood Plan is to provide a more detailed justification for each site.

In addition to the specifically high level of support by the community for the designation of both of these sites it is the desire of the community through the Neighbourhood Plan to use these designations to compensate for the intrusions into the AONB proposed by three of the site allocation policies.

Street Farm

Meeting the NPPF Tests

Paragraph 76 makes it clear that the purpose of designating a local green space is to rule out development other than in very special circumstances. Sedlescombe's community has given a clear unequivocal well-articulated desire for this site not to be developed because of its scenic beauty, tranquillity, richness of flora and wildlife and importance to the community particularly as a green gap in the most concentrated area of development within Sedlescombe.

In the Regulation 14 consultation on the Pre Submission Plan, **61%** (256 out of 361 who made any comment on any part of the plan) of all residents and stakeholders specifically supported Street Farm within policy 11. **81%** of these specifically citing scenic beauty, tranquillity, richness of plant life and wildlife and its importance as an undeveloped green gap as the reasons for wishing this area to be designated as a green space. Only 22 residents were against this designation. **88%** of the community generally supported the whole plan including the designation of this site as a green space. Details of the community's response to the site are detailed below and within the consultation statement.

Paragraph 77 requires the green space to be:

In reasonably close proximity to the community it serves.

- Street Farm is directly adjacent to approximately 40% of the dwelling in Sedlescombe. This was accepted by the inspector of the withdrawn plan (see Appendix C).

Be demonstrably special to a local community and hold particular significance, for example, because of its beauty, historical significance, recreational value or tranquillity or richness of its wildlife.

- Residents have clearly articulated in previous consultation responses and in their letters of objection that Street Farm is special to the community for its beauty, tranquillity and richness of wildlife. This was acknowledged and accepted by the inspector of the first Neighbourhood Plan submitted for examination (see Appendix C). The ecological importance of the site is also detailed in the report by Dr Patrick Roper in Appendix B of this report.
- As stated above in the Regulation 14 consultation on the Pre Submission Plan, **61%** (256 out of 361 who made any comment on any part of the plan) of all residents and stakeholders specifically supported Street Farm within policy 11. **81%** of these specifically citing scenic beauty, tranquillity, richness of plant life and wildlife and its importance as an undeveloped green gap as the reasons for wishing this area to be designated as a green space. Only 22 residents were against this designation. **88%** of the community generally supported the whole plan including the designation of this site as a green space. Details of the community's response to the site are within the consultation statement.
- In the District Council's regulation 14 submission, concern was expressed that the field did not have recreational value (in addition to historic significance) because there was no general public access. However Paragraph 77 of the NPPF does not require a designated green space to have public access or be in public ownership only that it '*Be demonstrably special to a local community and hold particular significance*'. 'Recreational value' is only cited in the condition as an example of what might make a designated green space '*demonstrably special to a local community and hold particular significance*', as are 'beauty, historical significance, and tranquillity or richness of its wildlife' It is not a condition in itself.

Where the green area concerned is local in character and is not an extensive tract of land.

- The land is clearly of local character as supported by The East Sussex County Council Landscape Assessment of the Brede Valley (2010) and was accepted by the inspector of the withdrawn plan (see Appendix A). There is no specific guidance in the NPPF on what constitutes *an extensive tract of land*. The inspector of the previously submitted Neighbourhood Plan concluded that the Parish Council had not provided evidence to demonstrate that Street Farm (4.43 hectares) was not an 'extensive tract of land'. In response, the Parish Council

has undertaken a survey of made Neighbourhood Plans as at April 2015. This showed that eight Local Green Space designations between 4.51 and 16.39 hectares has been successfully examined, i.e. they are larger than Street Farm. A full detail of this report is attached at Appendix A.

- Given that the NPPF gives no guidance on what comprises an *extensive tract of land* it is reasonable to take as a guide the evidence of successful designations in made plans. In the view of the Parish Council, the majority of the successful designations shared the key characteristics of Street Farm both being local in character and not an extensive tract of land given Street Farm is smaller than each of the designations in the plans evidenced.

Planning History

Early on in the Neighbourhood Plan development process it became clear the land at Street Farm forming the slopes of the Brede Valley was of special importance to the residents of Sedlescombe for its beauty, tranquillity and the green gap it creates in the otherwise densely developed area of the village. This is particular true for the residents of East View Terrace which is a very dense development of approximately 130 socially rented houses with very little amenity space.

It became clear that residents across the Parish wanted to rule out development of this entire site. A part of this site was put forward for development at the exhibition of sites in September 2013 and Street Farm performed second to last out of 10 sites exhibited for the community's preference for development (last was the village allotments). 44% of the community said they definitely did not wish for the site to be developed with the residents referring in this and every consultation to the site being special to the community for its beauty, tranquillity and richness of wildlife and plant life (see Appendix A).

A planning application (RR/2014/147/P) for 18 houses on this site was refused by RDC in early 2014. When the application and subsequent appeal in respect of RR/2014/147/P were being considered the third party comments made at both stages were analysed. Excluding those who wrote twice, the total making representations was 273, with over 50% objecting due to the impact on the AONB/the view, desire to keep the green space and ecological reasons. This clearly demonstrates the community support that exists for the designation

Analysis of these objections and those for the later appeal (APP/U1430/A/14/2219706) show that setting aside significant traffic issues, **68%** felt the impact on the AONB* would be permanently damaging and 46% identified this section and the whole meadow as demonstrably special given a combination of its special landscape characteristics, scenic beauty, and wide views to and from the site allowing the beauty and tranquillity of the countryside into the village. 13% (many of whom live in the concentrated social housing

of East View Terrace with little or no garden access) also commented on their regular use of the claimed footpath giving them access to a beautiful meadow.

In addition, the traffic assessment provided by the landowner only demonstrates that there will be 14 pedestrian movements (7 persons in and out) per day for a development with a potential of 67 persons. Conclusion is that development here would not contribute significantly or even marginally to sustainability based on RDC's criteria when assessed against dis-benefits and Paras. 14 (footnote 9) and Paras. 115 and 116 of the NPPF.

Ecological Report on the Site

In June 2014 Dr Patrick Roper prepared a report on the ecological and environmental factors relating to proposed housing development on Street Farm. This document sets out the clear ecological and environmental value of this hay meadow focusing on (Report attached at Appendix B):

1. The diversity of plant life which is significantly greater (372%) than RDC has been led to believe by the landowner
2. The impact of the loss of this type of hay meadow
3. The threat to both bat and barn owl local habitat and
4. The site's adjacency to a SNCI.

The report concludes that development on this site would diminish the size, attractiveness and importance to wildlife of the whole meadow. Development elsewhere will be less damaging to the environment and therefore more consistent with the NPPF's paragraphs 115 and 116.

Visibility of the Site

The proposed site is in clear view from footpath 2b and there are views to the wider countryside. The very prominence of development would make it incompatible with conserving the character of the AONB. Same reason used for rejection by RDC of sites in SHLAA, SE2 being directly comparable but with lower views. The site is in clear view from Footpath 36a at Magazine Farm and development would significantly change the landscape.

Community Use, Survey Results and Independent Landscape Assessment Comments

1. There are two claimed footpaths across the site. Within the evidence provided by the site owner, he states that he considers the hedge on Brede Lane boundary to be historic. Whilst the recommendation by ESCC at writing of this report is not to grant these applications they are subject to potential appeal.
2. State of the Parish Survey determined: 96% of residents considered it very or quite important to protect the countryside for residents and visitors. 94% of residents considered it very or quite important to preserve hedgerows and green areas. 93% considered it very or quite important to have developments with a low visibility in the countryside and not to spoil views. Development of this site is contrary to all of these residents' views.
3. During the two day exhibition of potential development sites Street Farm was assessed by the community as a possible site for development which could contribute up to 21 houses. Only 10% of the community supported the site for development and 44% said they definitely did not want the site developed. This site performed 2nd to last only surpassed by a proposal to develop the village allotments.
4. 92% of residents at regulation 14 consultation for the first submission of the Sedlescombe Neighbourhood Plan supported this site being made a green space.
5. The East Sussex County Council Landscape Assessment of the Brede Valley (2010) concluded in their Landscape Action priorities: *rigorous control of new housing development on the slopes of the ridges of the Brede Valley is a priority in reducing problems, pressures and detracting features.*
6. The Rother District Council Local Development Framework Core Strategy: Market Towns and Villages landscape Assessment 2009 rated this site of High Value and that the open land to the north (Street Farm) of the Brede Valley is part of the valley landscape.
7. The High Weald Area of Outstanding Natural Beauty Management Plan 2014-2019 published by the High Weald Joint Advisory Committee in March 2014 is also relevant. Page 25 contains a Vision for the AONB which includes accommodating an increasing number of households without compromising the characteristic historic settlement pattern as a result of strong planning policies and a sound understanding of the dynamics of sustainable communities. Page 40 refers the high Weald being characterized by small, irregularly shaped and productive fields often bounded by (and forming a mosaic with) hedgerows and small woodlands. The vision for such areas is expressed as *a landscape in which the distinctive and historic pattern of fields is managed to maximize its full landscape, historic and wildlife value, and in which the special qualities of grassland and heathland habitats are enhanced and maintained by skilled land managers.* Objective FH2 found on page 42 is to maintain the patterns of small irregularly shaped fields bounded by hedgerows and woodlands. Street Farm is typical of this description of the historic pattern of fields in this landscape.

Conclusion

The Parish Council remains of the view that there is a compelling case to respect the community's wishes to designate Street Farm as a Local Green Space. The Neighbourhood Plan has found more sustainable ways of growing the village that fulfil the District Council's housing requirement and are acceptable to a majority of the local community.

Furthermore, the Parish Council is mindful of the guidance in para 76 of the NPPF that the designation of Local Green Spaces is expected to endure beyond the current plan period. It cannot foresee a circumstance whereby, for as long as its ability to prepare a Neighbourhood Plan remains on the statute book, there will come a time when the community will prefer to see all or part of Street Farm developed, compared to future alternatives elsewhere around the edges of the village.

Red Barn Field

Red Barn Field is a small area of land which sits above the Village Hall and was in effect the land leftover after the Village Hall was constructed. A part of the top of the field was used to take subsoil removed when digging the foundations of the village hall during construction. The Parish Council owns the field and has promoted it as a quiet nature park over the last 10 years. During this period a small number volunteers have promoted wildflowers, and a fruiting hedge. In the regulation 14 consultation 114 (**27%**) of residents specifically supported this site to be designated as a green space and **74%** of these specifically cited comments relating to the richness of plant life and importance to the community as a reason for support. **88%** of residents generally supported the plan including this site's designation. Whilst this is less than half who supported Street Farm as a designated green space it ranked second to all comments supporting policies (see consultation statement) and met no objections.

Meeting the NPPF Tests

Paragraph 76 makes it clear that the purpose of designating a local green space is to rule out development other than in very special circumstances. On balance Sedlescombe's community articulated a desire for this site not to be developed.

Paragraph 77 requires the green space to be:

In reasonably close proximity to the community it serves.

- Red Barn Field is within 400m walking distance of the centre of the village

Be demonstrably special to a local community and hold particular significance, for example, because of its beauty, historical significance, recreational value or tranquillity of richness of its wildlife.

- Red Barn Field has a rich variety of wildflowers and provides a peaceful haven for residents.

Where the green area concerned is local in character and is not an extensive tract of land.

- Red Barn Field is not an extensive tract of land .

Visibility of the Site

The land is well contained and is surrounded by houses and the village hall on three sides and is enclosed by a strong boundary of trees where it meets the adjacent fields. It is visible from the village hall car park at the bottom of the field and is just visible from the footpath that runs behind the hedgerow at the top entrance of the field. The houses that front the B2244 which back onto the field have views from their rear windows. The old Schoolmaster's cottage also looks over onto the field.

Neighbourhood Plan Consultation

During the two day exhibition of potential development sites Red Barn Field was assessed by the community as a possible site for development which could contribute up to 6 affordable houses for local residents. 29% of the community supported this site for development and 41% said they definitely did not want it developed. Whilst this site performed considerably better as a site for development than Street Farm there was clearly strong feeling to maintain it as a green space even though it is not used extensively by the community as it is not as well located to the centre of the village.

Conclusion

Whilst Red Barn Field clearly has a reasonable level of community support for development of affordable housing and is well contained and would meet the objectives of the Neighbourhood Plan and the District Council, this is offset by a considerable proportion of the community who wish to retain this site as a green space. On that basis the Parish Council resolved to designate this site as local green space in the neighbourhood plan.

Appendix A

LOCAL GREEN SPACES STUDY

Introduction

This report considers the comments made by the Inspector in the examination of the SNP with regard to Local Green Spaces, and compares these with recommendations made in respect of other Neighbourhood Plans that have been the subject of examination.

Sedlescombe Neighbourhood Plan

The Inspector considered that of the two sites proposed as a Local Green Space, Red Barn Field met the advice in the Framework, but Street Farm did not. He quoted the requirements for designation as being that the green space should be in reasonably close proximity to the community it serves; is demonstrably special to a local community and holds a special significance (for example, because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife); and is local in character and is not an extensive tract of land (paragraph 77 of the Framework). The Inspector concluded that Street Farm was in close proximity to the community and was local in character. The only reason the Inspector recommended that Street Farm not be designated as a Local Green Space was that he considered it to be an extensive tract of land. It extends to 4.43 hectares. The population of the Parish is approximately 1,500 people (2011 census). The importance of the land to the community as an open space has been documented previously as both part of the Neighbourhood Plan process and during the Section 78 appeal. The fact that there are two claimed footpaths across the site and the ecological importance of the site have also been referred to. In addition, and very important to the designation is the fact that the land is recognised locally for its beauty.

The concerns of RDC appear to be based on two main issues. The first is that the designation as a Local Green Space is seeking to provide a “back door” way to achieve what would amount to a new area of Green Belt which is contrary to the advice in the NPPG (ID 37-016-20140306).

However, that advice is given in the context of the preceding sentence which refers to “the blanket designation of open countryside adjacent to settlements”. Clearly that is not the case here. The Street Farm meadow is well bounded by hedgerows in its entirety and is therefore not open countryside and the Neighbourhood Plan does not propose to make any other such designations on this side of the village. In fact, there is only one other proposal, and that is on the opposite side of the village. There is therefore no attempt to secure a “blanket designation”. Indeed, the designation as a Local Green Space has followed the advice in paragraph 76 of the NPPF which states *‘Local communities, through Neighbourhood Plans should be able to identify for special protection green areas of*

particular importance to them. By designating land as Local Green Spaces local communities will be able to rule out new development other than in very special circumstances.'

The other issue that was raised by RDC was the lack of public access to the site. However, recreational value of an area is only one of the issues that are identified as relevant in paragraph 77 of the NPPF. Other factors are described in paragraph 77 which need to be taken into account. The value of the site to the community for its beauty, tranquillity and richness of wildlife has been documented previously both in relation to the comments made during the publicity of the Neighbourhood Plan and the Section 78 appeal. There is nothing in paragraph 77 which indicates that a site must meet all the bullet points to qualify for designation as a Local Green Space.

For these reasons it is maintained that the reason for the rejection of the site as a Local Green Space related to the issue of whether it was an extensive tract of land or not. This report remains focused on other Neighbourhood Plans where decisions have been taken on examination, with particular reference to whether Local Green Spaces are extensive tracts of land.

Allendale Neighbourhood Plan

This Parish in Northumberland has a population of approximately 2,000. The Neighbourhood Plan has allocated an area of 2.52 hectares as a Local Green Space. The Plan refers to the fact that the parish was concerned that school playing fields may be regarded as surplus and available for built development. The Council carried out a survey of those living in close proximity to the playing fields. Of those who responded 96% agreed that the land should be protected as a Local Green Space. They valued the playing fields for their tranquillity and wildlife benefits. The examining Inspector's report concluded that the land was not an extensive tract of land. He found that the green space was demonstrably special to the local community. He considered that the allocation met the tests in paragraphs 76 and 77 of the Framework.

Chapel en le Frith Neighbourhood Plan

This Derbyshire Neighbourhood Plan identified 21 areas of land as Local Green Spaces, one of which was High School Fields, an area of 4.17 hectares. The Neighbourhood Plan identified recreation and views from the site as the reasons for the designation. The criteria and reason for selection identified the site as in reasonably close proximity to the community and demonstrably special to residents with significant views. It also had recreational value and was identified as tranquil and of ecological value. It provided a significant green break within the settlement. Of particular relevance was the fact that it was not considered to be an extensive tract of land as it only occupied 0.1% of the Neighbourhood Plan area.

The Inspector who conducted the examination quoted from the NPPG that '*other land could be considered for designation even if there is no public access (e.g. green areas which are*

valued because of their wildlife, historic significance and/or beauty’. She considered High School Fields as being close to the community and demonstrably special and held a particular local significance with regard to their recreational value. They were local in character and were not an extensive tract of land. She concluded that she was satisfied that the fields met the criteria for designation.

Loxwood Neighbourhood Plan

Loxwood is in West Sussex and has a population of approximately 1,800 (2011 census). The Neighbourhood Plan identified the Loxwood Sports Association site as a Local Green Space. This extends to some 4.51 hectares. It comprises two fields separated by a mature hedgerow. It contains a cricket and stool ball pitches, the parish football pitch with stands, floodlighting and dugout. There is also a two storey building on the land containing a bar, squash court, snooker room, changing room and private physiotherapy practice. The examining Inspector considered that the site met the criteria contained in the Framework for inclusion as a Local Green Space. No mention was made in the report of whether or not the site comprised an extensive tract of land.

Broughton Astley Neighbourhood Plan

This Parish in Leicestershire has a population of approximately 8,900 (2011 census). The Neighbourhood Plan identified the Recreation Ground as a Local Green Space. The area being 4.62 hectares. The Plan stated that there was a strong desire to preserve existing publicly accessible open spaces and green spaces surrounding the village, to ensure that any new development maintained public rights of way and also to improve the footpath networks to provide access to the surrounding countryside. Those areas that had been demonstrated of significance to the local community were designated as Local Green Spaces. This followed a survey in 2012 where 75% of respondents wished to protect and improve habitats for wildlife within and around the village and 75% wished for opportunities to walk, cycle and run off road to be enhanced.

The examining Inspector quoted from the Framework stating that *‘by designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances’*. He considered that the policy met the basic conditions and no mention was made of whether it was considered that the Recreation Ground was an extensive tract of land.

Wing Neighbourhood Plan

This Parish in Buckinghamshire with a population of 2,745 (2011 census), identified a number of Local Green Spaces. The consultation exercises showed that key areas of concern were their loss for recreational use, loss of wildlife and loss of the green boundary around the village. These issues would be addressed by policies to ensure green spaces were protected for both leisure pursuits and wildlife. The value of trees, hedgerows

and landscape would also be taken into account. The Council prepared a separate report on Local Green Spaces in April 2014. This identified the difficulties arising from the lack of a clear definition of what constituted an “extensive tract of land”. Central Bedfordshire Council’s 2012 Local Green Space paper concluded that only the very much more strategic areas of open space, such as Rushmere Country Park (162ha) should be considered “extensive tracts”. The report stated that designation had been limited to small areas within the village which were vital to the open, rural feel of the village; those areas used for sport and recreation and those areas on the immediate periphery with public access regularly used for local leisure and dog walking, many having historic, landscape or wildlife importance.

A simple scoring system was established based on proximity to the community, beauty, historic significance, recreational value, wildlife, footpaths and tranquillity. Using this, four sites were chosen for allocation which are relevant to this report. They are Long Spinney 5.87 hectares, Heley's Field 7.47 hectares, Vicarage/Old Park field 10.76 hectares and Monument fields at 16.39 hectares. The Inspector who conducted the examination had no objection to the designations of Local Green Spaces and made no comment on the issue of whether or not they were “extensive tracts of land”. The assumption must therefore be that he did not consider them to be.

Market Bosworth Neighbourhood Plan

The small town of Market Bosworth is situated in Leicestershire. The Parish population in the 2,001 census was 1,900. The Neighbourhood Plan identified two Local Green Spaces that are relevant to this report. The first is Silk Hill which extends to 8.39 hectares. The Plan states that it was believed that part was believed to be ancient earthworks with a spring that had been channelled into a drinking channel for livestock. Reference was made to possible pre-medieval land use, clearly unploughed and presumed to have been used for grazing since.

The site was considered to be of great community value as the traditional place for sledging following snowfall. The site was in very good condition and accessible to the public being crossed and bounded by public rights of way. It was identified at community engagement events and through questionnaires as being of value to the community for walking, running, cycling, dog walking, sledging and general relaxation within a tranquil setting. The second identified in the Plan was the Country Park 15.99 hectares out of 35 hectares that was within the Plan area. Reference was made to its distinct parkland features. It contains magnificent mature trees, a lake, a planted arboretum, wildflower meadow and community woodland. It is a popular attraction and 97.5% of the community identified it as a valued open space. The examining Inspector’s report considered that Silk Hill was an important feature in many of the views and vistas identified in the Plan and was a defining feature in the setting of the town on the top of a hill. He noted that there was extensive public access. It was quite a large area, but was much smaller than the Country Park and enjoyed no special protection.

He considered that it was precisely the sort of area for which Local Green Space designation was intended and he was entirely satisfied that it met the requirements for Local Green Spaces set on in the Framework. By contrast he considered that the Country Park was an extensive area of open space which was larger than the allocation. He noted that there was no definition of “extensive” and that the meaning would vary with local circumstances. He concluded that it was too large for designation, but was already protected from inappropriate development by saved policy REC1 of the Local Plan.

Much Wenlock Neighbourhood Plan

This Neighbourhood Plan in Shropshire identified a total of 10.44 hectares of Local Green Spaces comprising Gaskell Fields, Windmill Hill, the Holy Trinity Church Green and land at Southfield Road and Havelock Crescent. The Plan states that they met the relevant criteria under the Framework guidance for special protection under the designation of Local Green Space. Policy GOS1 of the Plan restricts built development on green and open spaces. The examining Inspector’s report noted that the policy listed several green and open spaces that had been identified to protect them from development. He stated that he had clarified from the Town Council that their purpose was to protect them from built development. The only recommendation made in relation to this policy was a modification to provide the degree of protection intended.

Backwell Neighbourhood Plan

Backwell in Somerset has a population of 4,500 (2011 census). The Neighbourhood Plan section on Local Green Spaces commented that the Plan responded to resident’s desires for substantial areas of Local Green Space to secure an environment that offers respite from the nearby Bristol conurbation, Bristol Airport and through traffic that traverses much of the village. The Plan identified two sites for inclusion as Local Green Spaces. The first Farleigh Fields extends to 19 hectares. It provided the best and most far reaching views available from any open space in the village. It was important for numerous recreational activities and provided a number of habitats. The second area was Moor Lane Fields of 32 hectares. This also afforded good views, contained hedgerows of historical significance and was popular for recreation. The Parish Council concluded that both areas were demonstrably special to the local community.

The Inspector who examined the Plan quoted the requirements that an allocation needed to meet in full. Whilst considering them both to be attractive countryside and containing public footpaths, he observed that the most striking thing about both was their substantial size. He concluded that both were “extensive tracts of land”. He stated that no compelling evidence had been submitted that they were not extensive tracts of land. He recommended that both be deleted.

Conclusion

The Street Farm site extends to 4.43 hectares. This compares very favourably with other Local Green Spaces that have been accepted by other Inspectors. For example Jubilee Wood 3.4 hectares, High School Fields 4.17 hectares (Chapel en le Frith), Recreation Ground 4.62 hectares (Loxwood), the population of which is not dissimilar from Sedlescombe. Whilst Wing Parish is larger than Sedlescombe (2,745), Local Green Spaces of 5.87, 7.47, 10.76 and 16.39 hectares were all accepted as suitable for designation without any comment being made by the Inspector as to the issue of “extensive tracts of land”.

The population of Market Bosworth Parish is not dissimilar from Sedlescombe and the Inspector accepted a Local Green Space of 8.39 hectares. The three sites identified in this report as being “extensive tracts of land” were significantly bigger than Sedlescombe being 15.99 hectares out of a 35 hectare park (Market Bosworth), 19 and 32 hectares (Backwell). The designation accords with the advice in paragraph 76 and 77 of the NPPF. The Plan does not seek to achieve a blanket designation of open countryside adjacent to Sedlescombe. Instead it has designated a Local Green Space on land which is valued as being demonstrably special to the local community and holds a particular local significance because of its beauty, tranquillity and richness of wildlife.

Appendix B (unedited)

A note on some ecological and environmental factors relating to the proposed housing development on Street Farm, Sedlescombe, East Sussex

Patrick Roper, June 2014

1.0 Introduction

- 1.1 On 4th June 2014, Patrick Roper, the author of this note, was asked by Jonathan Vine-Hall, chair of the Sedlescombe Parish Council, if he could add any further ecological or environmental justification for the whole of Street Farm to be an undevelopable green space, an approach which is supported by 92% of Sedlescombe residents.
- 1.2 Dr. Roper and his family have been resident in Sedlescombe for over 40 years. He has worked for 20 years as a consultant ecologist, largely in Sussex (for a fuller CV see end of this note - page 11). He lives in Churchland Lane, Sedlescombe, and is therefore not directly affected by this particular proposal in the parish's Neighbourhood Plan or those of the developer.
- 1.3 The purpose of this note is to highlight the many ecological and environmental factors that are important in the Street Farm area and may be damaged or compromised if the proposed development goes ahead. The author of this note has also commented (APPENDIX 1) on the preliminary ecological assessment of the area prepared by Landscape Planning Ltd (LPL) in February 2014 as this has many serious flaws.

2.0 Background to Street farm

- 2.1 The current development proposal has been put forward by MJH Executive Homes Ltd. and involves the construction of 18 houses in the eastern part of the large (4.44 hectares¹) Street Farm field adjacent to the south western part of East View Terrace and Blacklands along Brede Lane. The footprint of the development currently proposed, and which (with surrounding areas) is the subject of this note, is 1.55 hectares including 0.41 hectares to be transferred to the school as playing fields. Before this an area on the north side of the Street Farm field was proposed for development by MJH. The various documents seen by the author of this note can refer to any one of these three areas and care needs to be taken to be sure which one is being discussed.

3.0 Methodology of this note

- 3.1 The site was visited on 5th, 9th and 13th June 2014 by the author of this note. Desk research was also undertaken on a variety of relevant issues including study of the

¹ Most area values have been calculated using an online planimeter and are therefore approximate but give a good indication of scale.

Preliminary Ecological Appraisal (February 2014) of the area by Landscape Planning Limited (LPL). As mentioned above, this appraisal is considered more fully in APPENDIX 1 below.

3.2 All plants recorded on the site by the author of this note are listed at the end.

4.0 Site description

4.1 The proposed development site essentially involves the eastern end of a large hay meadow which had, according to Landscape Planning's ecology report, two hay cuts last year (2013). It is in Sedlescombe Parish, Rother District and the High Weald Area of Outstanding Natural Beauty.

4.2 Although it does not have the characteristics of an ancient meadow or pasture, the great diversity of plant life indicate that this meadow has not been recently sown, unless a special conservation seed mix was used. The main constituents are meadow buttercup (*Ranunculus acris*), common sorrel (*Rumex acetosa*), cocksfoot grass (*Dactylis glomerata*), Yorkshire-fog grass (*Holcus lanatus*), sweet vernal-grass (*Anthoxanthum odoratum*) and rough meadow-grass (*Poa trivialis*), but there are many other plant species. The field is what would be described by most people as a 'buttercup meadow'. In the technical term of the National Vegetation Classification this is one of the MG (Mesotrophic Grasslands series), though not readily ascribable to a particular category of this system. Four butterfly species were also noted: the small blue, the large skipper, the small tortoiseshell and the small heath. The latter is a declining BAP species (for research purposes). Grasshopper nymphs were also present.

4.3 It is difficult to understand why staff at the High Weald Area of Outstanding Natural Beauty have, apparently, said they felt development here would not affect the AONB. Lowland meadows are one of the habitats in the Sussex Biodiversity Action Plan because they are often botanically rich and support, or help to support, many mammal, bird and invertebrate species. They also help to compliment the life of surrounding hedgerows, woods and wetlands as part of a habitat mosaic. Hay meadows have been declining rapidly throughout Britain.

4.4 Lowland meadows are described as a 'habitat of principle importance in England' (Natural Environment and Rural Communities (NERC) Act 2006), Section 41. Rother District Council fully acknowledge the importance of meadows in their *Green Infrastructure* document (2011), part of the Local Development Framework.

4.5 In June the Street Farm meadow (see right) is part of a beautiful, characteristically English landscape: an iconic element of the summer countryside that has often been celebrated by writers from Sussex and elsewhere. For example, W. H. Hudson wrote "I doubt if there exists within the tropics anything to compare with a field of buttercups--such large and unbroken surfaces of the most brilliant colour in nature." While novelist E. F. Benson who lived in Rye said "it is the month of the briar-rose. See how the hedges foam with pink blossom. And the fields, look, knee-deep in long grasses and daisies and buttercups. I am home again, thank Heaven. I am home."



- 4.6 An additional point of interest is that the distant ridge beyond the field is the one down which the Norman army advanced at the 1066 Battle of Hastings.
- 45 Many of the plants present attract insects to their nectar and/or pollen and serve as foodplants. Buttercups, for example, "are visited by a very wide range of insects for nectar and pollen" (Proctor, Yeo & Lack, 1996); fifty four species of insect were recorded visiting meadow buttercup flowers in Germany (Steinbach & Gottsbergk, 1993).
- 46 Wildflower-rich grasslands are a valuable habitat for bumblebees, important pollinators of fruit trees, as they contain many nectar and pollen-rich plant species, which are favoured by them. To feed and nest, bumblebees need large areas of flowers throughout the summer. But the meadows that were common earlier this century have been ploughed up for crops or are now grazed by cattle and sheep. .. The loss of meadows is the major factor in the modern population crash of these bees (Edwards, 1999).
- 4.7 Hedges are an important part of the site and it's surrounds in ecological, landscape and historic terms. Writing in the *Hedgerow Survey Handbook* (2002) the then environment minister, Michael Meacher said "Hedges are extremely important not just to farming, but to the wildlife, beauty and diversity of our countryside, and to our culture and understanding of how that countryside has evolved over the centuries. They have been aptly described as the green veins of our countryside, and without them our nation would be greatly impoverished."
- 4.8 The hedges on the north, east and south of the proposed development site are all rather different in character but of importance to wildlife not only in their own right, but

as a compliment to the open field. The ecological report by LPL considered below covers not only these three hedges, but also the one on the west of the field some 270 meters from the proposed development site. This western part of the field would, of course, be affected by the establishment of school playing fields.

- 4.9 The hedge on the north of the area on the south side of Brede Lane is almost entirely of common hawthorn (*Crataegus monogyna*). From the even size of the individual plants and their rather large, shiny leaves it is clear that they have been fairly recently planted and are not of local stock (a not uncommon occurrence in Britain). There is a wooden fence within the hedge. In addition to the hawthorns, ash, yew, dog rose, holly, hazel and bramble have succeeded in establishing themselves in the hedge as have at least 25 smaller plants in the hedge bottom. In recent years fallow deer have been seen in this part of Brede Lane and this needs to be borne in mind from the road safety point of view.
- 4.10 The 20 metre stretch of hedge along Brede Lane that would have to be removed to allow access to the proposed development site is virtually identical with the rest of the stretch as described in 4.9 above. In addition to hawthorn, the main constituent, it contains bramble (*Rubus fruticosus* agg.), stinging nettle (*Urtica dioica*), hogweed (*Heracleum sphondylium*), creeping buttercup (*Ranunculus repens*), cocksfoot grass (*Dactylis glomerata*), rough meadow-grass (*Poa trivialis*), holly (*Ilex aquifolium*), lords and ladies (*Arum maculatum*), Italian lords and ladies (*Arum maculatum* cv), goosegrass (*Galium aparine*), garlic mustard (*Alliaria petiolata*), hedge bindweed
- 4.11 On the east of the site the hedges are a mixture of different species many planted on the boundaries of the gardens in Blacklands and East View Terrace. Some of these, such as garden privet (*Ligustrum ovalifolium*), Japanese honeysuckle (*Lonicera japonica*) and Russian vine (*Fallopia baldschuanica*) are not natives, but the hedges and the tall scrubby vegetation close to it offer a good habitat for wildlife.
- 4.12 The hedge on the south of the site running from the kickabout area on the south west corner of the East View Terrace estate westwards for some 325 metres is of much greater interest ecologically and historically than those considered above. It grows on a half-bank sloping to the south and many stretches consist almost entirely of hazel (*Corylus avellana*). This is not normally used for hedging today and the individual plants are large enough to have been in place for some considerable time. In addition to hazel there are oak, holly, ash, blackthorn, ivy, dog rose, hop, bramble, honeysuckle and a rich variety of smaller plants. Ancient woodland indicators such as field rose, bluebell and wood anemone also occur on the half-bank. The invertebrate life of a hedge of this kind is likely to be very rich: 830 species of fly (Diptera) were, for example, recently recorded from an 85 metre length of hedge in Devon (Wolton et al., 2014). This is about the same length as the strip of hedge on the southern boundary of Street Farm field that would be adjacent to the new development.

4.13 There are no waterbodies on the site

itself but just to the south of the kickabout area on the edge of Catt's Shaw there are two springs that give rise to small streams that flow down to the river Brede. The location of the springs is readily visible in summer from the circular patches of white-flowered hemlock water dropwort (*Oenanthe crocata*) growing around them (see left).



There is standing water at these springheads for much, if not all, of the year and

they may be breeding sites for amphibians. It is thought unlikely that they are visited by great crested newts, but this could easily be checked at the appropriate time of year. An older inhabitant of Sedlescombe has said that some people used to get their water from these springs (though the main source, of course, was the pump on the village green.) It is important to establish that these springs would not be affected by runoff from the proposed development area.

4.14 There is a small pond marked on various maps some 370 meters from the proposed development area. On the 1878 Ordnance Survey 1:10,560 map it is shown as lying in the corner of a field at TQ7836617854, a field that is now mostly scrubbed over. The pond area itself is heavily overgrown with willow trees, brambles and other vegetation making it impossible to approach without clearing the area. It has probably both dried and silted up, though it may contain some water in winter. At a distance of 370 meters from this pond, the proposed development site is within the terrestrial range of legally protected great crested newts. However, it is thought that the pond is not a suitable habitat for them, though it ought to be checked.

4.15 Catt's Shaw, the ancient woodland to the south of the site, would be affected by greater pressure in a variety of ways such as additional noise, light levels at night, potential pollution via runoff, higher footfall and dog walking and the presence of a greater number of cats. It is an unusual wood inasmuch as there is no fence between it and the surrounding pasture and both wood and pasture are grazed by domestic stock for much of the year. This is gradually changing Catt's Shaw from woodland to wood pasture, a habitat that can often be more valuable in ecological terms than ancient woodland.

4.16 The kickabout area, the springs, the woodland edge, the ancient hedge, the hay meadow and pasture make an ideal habitat for the bats that are currently present in the area. There are many potential roosting sites in Catt's Shaw and the general area should be surveyed so that the commuting and foraging routes of the bat

population can be better understood and used in creating mitigation strategies for any development that might go ahead in the area. However, Natural England say "Measures to address potential effects on protected species should firstly aim to avoid those impacts." All bat species in England are legally protected.

- 4.17 The common eel (*Anguilla anguilla*) has recently been recorded from the nearby Brede valley. It is listed as Critically Endangered on the IUCN Red List and is a UKBAP Priority Species. Although it can travel overland, it is unlikely to be directly affected by the proposed development but it highlights the importance of ensuring the local waterbodies remain as unpolluted as possible.
- 4.18 Barn owls have bred regularly in Oaklands Park (Pestalozzi) on the southern side of the river Brede. Wild barn owls are given the highest level of legal protection possible under the 1981 Wildlife and Countryside Act. They require rough grassland, the edges of watercourses and grass strips alongside woods for hunting. According to the RSPB a pair of barn owls requires about 20-25 km of edge habitat with several suitable roosting sites. The area of the proposed development is good barn owl habitat.
- 4.19 The proposed development site lies about 235 metres from the closest part of the Brede Valley Site of Nature Conservation Importance (SNCI). This covers 1089 hectares and has been described as of outstanding importance for wildlife by the Sussex Wildlife Trust.
- 4.20 The Friends of the Brede Valley say that it "*supports a great many plant and animal species in varying abundance by providing the habitats in which they live. Some of the species and habitats are locally and nationally rare, and this has contributed to the area's recognition as being of significant importance to the county, through its designation as a Site of Nature Conservation Interest (SNCI).*"
- 4.21 One of the most important biodiversity aspects of the Brede Valley is the large number of unusual plant and animal species that have been recorded from the dykes and ditches. It is therefore important that these features remain unpolluted. It is assumed that a modern drainage system would be included in the MJH plans, but the issue of run-off southwards from the proposed houses and gardens needs to be addressed and the strategy clearly stated.
- 4.22 The combination of river, ancient woodland and meadow from Sedlescombe Bridge to Brede Bridge, (some 4.38 km) uninterrupted by roads or railways creates a rich and dynamic diversity of habitat that can contribute much, both in terms of biodiversity and landscape aesthetic to the wider area. The proposed development would diminish the size, attractiveness and wildlife importance of this area. It might also be considered the 'thin end of the wedge' by creating a precedent for further urban development across Street Farm and similar sites.

- 4.23 In the government's National Planning Policy Framework (NPPF), para 115, it says:
 "Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas."
- 4.24 Natural England say "Measures to address potential effects on protected species should firstly aim to avoid those impacts."
- 4.25 In conclusion it is argued that residential houses of an equivalent number and type should be sited elsewhere in the parish as has been proposed in the Neighbourhood Plan. This would be far less damaging to habitats and species in this very special part of the Brede Valley as well as being desirable in aesthetic, cultural and social terms.

REFERENCES

- Defra** (2011) *Identification of injurious weeds*.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69265/pb4192-injurious-weeds.pdf
- Edwards, R.** (1999) *The plight of the bumblebee* by Rob Edwards. *New Scientist* 2177, page 15.
- JNCC** (2011) *UK Biodiversity Action Plan; Priority Habitat Descriptions*. BRIG (ed. Ant Maddock) 2008.
 (Updated 'HF 201)
- Proctor, M., Yeo, P & Lack, A.** (1996) *The Natural History of Pollination*. New Naturalist (HarperCollins), London.
- Rother District Council** (2011) *Green Infrastructure*.
<http://www.rother.gov.uk/CHttpHandler.ashx?id=14911&p=0>
- Steinbach, K. & Gottsberge**k (1994) Phenology and Pollination Biology of Five Ranunculus Species in Giessen, Central Germany. *Phyton (Horn, Austria)* **34** (2): 203-218.
- Sussex Biodiversity Partnership** (2007) *Lowland Meadows*.
<http://www.biodiversitysussex.org.uk/habitats/lowland-meadows>
- Wolton, R. J., Bentley, H, Chandler, P. J., Drake, C. M., Kramer, J., Plant A. R. & Subbs, A. E.** (2014) The diversity of Diptera associated with a British hedge. *Dipterists Digest* **21** (1): 1-36.

Plant list. The plants below were recorded from the proposed development area in mid-June 2014 by the author of this note. It is not comprehensive but gives some indication of the natural character of the area:

<i>Pteridium aquilinum</i>	Bracken
<i>Dryopteris dilatata</i>	Broad Buckler-fern
<i>Dryopteris filix-mas</i>	Male-fern
<i>Taxus baccata</i>	Yew
<i>Calystegia sepium</i>	Hedge bindweed
<i>Arum italicum</i> ssp. <i>italicum</i>	Italian Lords-and-Ladies
<i>Arum maculatum</i>	Lords-and-Ladies
<i>Hyacinthoides non-scripta</i>	Bluebell
<i>Anisantha sterilis</i>	Barren Brome
<i>Anthoxanthum odoratum</i>	Sweet Vernal-grass
<i>Arrhenatherum elatius</i>	False oat-grass
<i>Dactylis glomerata</i>	Cock's-foot
<i>Holcus lanatus</i>	Yorkshire-fog
<i>Poa trivialis</i>	Rough Meadow-grass
<i>Lolium perenne</i>	Rye grass
<i>Aethusa cynapium</i>	Fool's Parsley
<i>Anthriscus sylvestris</i>	Cow Parsley
<i>Heracleum sphondylium</i>	Hogweed
<i>Hedera helix</i>	Ivy
<i>Achillea millefolium</i>	Yarrow
<i>Bellis perennis</i>	Daisy
<i>Cirsium arvense</i>	Creeping Thistle
<i>Crepis capillaris</i>	Smooth Hawk's-beard
<i>Hypochaeris radicata</i>	Cat's-ear
<i>Lapsana communis</i>	Nipplewort
<i>Sonchus asper</i>	Prickly Sow-thistle
<i>Taraxacum officinale</i> agg.	Taraxacum officinale agg.
<i>Carpinus betulus</i>	Hornbeam
<i>Corylus avellana</i>	Hazel
<i>Alliaria petiolata</i>	Garlic Mustard
<i>Humulus lupulus</i>	Hop
<i>Lonicera japonica</i>	Japanese Honeysuckle
<i>Sambucus nigra</i>	Elder
<i>Cerastium fontanum</i>	Common Mouse-ear
<i>Silene dioica</i>	Red Campion
<i>Stellaria graminea</i>	Lesser Stitchwort
<i>Stellaria holostea</i>	Greater Stitchwort
<i>Convolvulus arvensis</i>	Field Bindweed
<i>Vicia cracca</i>	Tufted Vetch
<i>Vicia sativa</i>	Common Vetch

<i>Quercus robur</i>	Pedunculate Oak
<i>Geranium dissectum</i>	Cut-leaved Crane's-bill
<i>Glechoma hederacea</i>	Ground-ivy
<i>Stachys sylvatica</i>	Hedge Woundwort
<i>Fraxinus excelsior</i>	Ash
<i>Ligustrum ovalifolium</i>	Garden Privet
<i>Epilobium hirsutum</i>	Great Willowherb
<i>Plantago lanceolata</i>	Ribwort Plantain
<i>Fallopia baldschuanica</i>	Russian-vine
<i>Rumex acetosa</i>	Common Sorrel
<i>Rumex crispus</i>	Curled Dock
<i>Rumex obtusifolius</i>	Broad-leaved Dock
<i>Rumex sanguineus</i>	Wood Dock
<i>Anemone nemorosa</i>	Wood Anemone
<i>Ranunculus acris</i>	Meadow Buttercup
<i>Ranunculus repens</i>	Creeping Buttercup
<i>Crataegus monogyna</i>	Hawthorn
<i>Prunus spinosa</i>	Blackthorn
<i>Rosa arvensis</i>	Field-rose
<i>Rosa canina</i> agg.	Rosa canina agg.
<i>Rubus fruticosus</i> agg.	Bramble
<i>Galium aparine</i>	Cleavers
<i>Salix cinerea</i>	Grey Willow
<i>Veronica chamaedrys</i>	Germander Speedwell
<i>Urtica dioica</i>	Common Nettle

APPENDIX 1

Some comments on Landscape Planning Limited's (LBL) *Preliminary Ecological Survey*.

Patrick Roper, June 2014

1. The LBL report has no page or paragraph numbers so page numbers used in this note are those generated by the pdf file of the document.
2. The ecology report from Landscape Planning Ltd. is described as 'preliminary' which prompts the question as to whether further reports are scheduled. However LPL do say their report "is an assessment of the potential for the presence of European and other protected species." LPL also say "This report also specifically excludes invasive and pest species unless specifically instructed by the client." This is taken to mean alien invasive species as defined by the Government since there are, as would be expected on any field of this size, many native invasive and pest species on the site, e.g. bracken, bramble and broad-leaved dock (Defra, 2011).
3. Although this may not have been part of their brief, it is a pity that virtually no information is included on physical geography and geology of the site. It is simple to say something like "The 1.55 hectare survey site is on the south facing side of the Brede Valley in

the High Weald Area of Outstanding Natural Beauty. It has a mean altitude of 30 metres above sea level (Ordnance Datum). The underlying geology is sandstone and mudstone with clay bands, all of the Ashdown Formation.

4. LPL Page 7. The opening paragraph is difficult to understand. The author(s) describe the survey area as comprising the 'Vale of Rother, and High Weald Area' possibly confusing it with the Rother Valley some 7km to the north and, presumably, the High Weald AONB. It goes on to say that the area "forms an important element of the English lowland scene, with gently rolling vistas including river valleys and higher grounds, a mixture of arable and grass fields surrounded by hedgerows and interspersed with small woods." This appears to come from a description by English Nature of their Natural Area 63 *Thames and Avon Vales* of which EN write "It forms an important element of an English lowland scene with its gently rolling vistas with a mixture of arable and grass fields surrounded by thick hedgerows and interspersed with small woods."

5. At the end of the second paragraph LPL say "To the south are playing fields, allotments, gardens and woodland." This is misleading as no allotments can be seen from the development area and only a small sliver of the Sedlescombe sports field. To the south of the site the landscape is mainly woodland and meadow with Pestalozzi's Oaklands Park in the distance. The mention of playing fields, allotments and gardens gives a false impression that the site is more urban than it is.

6. Paragraph 3 on page 7 of LBL's report is, again, difficult to understand. It reads "*Road Farm is located on the road frontage of Brede lane. The farm comprises of a small residence with the development site to the anterior of this property. As with all adjacent properties, gardens are well maintained with ornamental exotics.*" Presumably the author(s) mean Street Farm rather than Road Farm. The development site is, according to the maps I have seen, on the eastern side of a large field about 180 metres from Street Farm and the remark by LBL presumably refers to an earlier plan (still on the MJH web site at the time of writing this report) or to the proposed new playing field area. The sentence about local gardens does not seem relevant, though gardens round about are indeed well-maintained, but contain a variety of interesting native plant species as well as exotics.

7. In paragraph 6 on page 7 of their report LBL say the habitat survey was carried out on 6 September 2013. This survey does not inspire confidence as only 18 plants are listed (Appendix 3) whereas 67 plant species were noted in brief visits to the site in mid-June 2014 by the author of this note. There is no reason why virtually all of these 67 species would not have been evident in the previous September.

8. The LBL plant lists also contain several spelling errors such as *Crataegus* spelt '*Crateagnus*'; *aquifolium* spelt '*aquilifolium*'; *aquilinum* spelt '*aquilirium*'; *Convolvulus* spelt '*Convulvulus*'. Most people dealing regularly with plants like this would know how to spell their scientific names and have them on spell checkers. A Grape (*Vitis* sp.) is listed as one of

the hedgerow species. While it is possible that this occurs, the author of this note has never seen a grape vine in a Sussex hedge in many years of ecology surveying. Maybe, the Russian vine (*Fallopia baldschuanica*) that has been planted at the end of one of the Blacklands gardens and grown into the hedge, or the hop (*Humulus lupulus*) in the south eastern corner of the site have somehow been confused with the grapevine as neither Russian vine nor hop are mentioned by LBL. The only willow seen by the author of this note was grey willow (*Salix cinerea*) and the privet which grows near the Russian vine is garden privet (*Ligustrum ovalifolium*) not wild privet (*Ligustrum vulgare*).

9. To list only four plants in the grassland where most of the development would be built is a serious distortion of the facts as it indicates that the area is much more species poor than it is. The DAFOR codes for the four plants listed in the grassland are irrelevant when most of the species growing there have been ignored.

10. On page 8, LPL say: "Although records show protected species within 2km of the site, including great crested newts, reptiles, dormice, bats including Common Pipistrelle, Serotine and Brown long eared, none were noted within the vicinity of the site." LBL point out that the site provides some potential terrestrial habitat for legally protected great crested newts, but say there are no ponds within 500 metres of the site. This is not strictly correct. There are pools, or small ponds, around the two springheads south of the kickabout area (see para 4.13 above) and a pond some 370 metres from the residential housing site (at TQ7836617854) is marked on many maps. This is surrounded by dense scrub and trees and may have dried up permanently, but should be checked.

11. Slow-worms are not uncommon around the survey area as they are almost everywhere in Sedlescombe with the most recent report being from East View Terrace in June 2014. Common lizards are also likely to occur as are grass snakes and possibly adders. Bats are present on the site and may well roost in Catt's Shaw or in houses in East View Terrace. They occur around the kickabout area and there are many parts of Street Farm where large numbers of airborne insects make very good foraging areas for them. Unbroken lines of hedge are important as markers for commuting.

12. It is important that proper surveys are undertaken for reptiles and bats, though it is agreed that great crested newts are unlikely on the site or within 500 metres. The nearby presence of protected species like barn owls and eels should also be acknowledged.

13. 13. It is the view of the author of this note that LPL's preliminary ecological assessment is superficial, full of mistakes and contains misleading information. It should not be used to help determine the future of an area so important to Sedlescombe's future.

Patrick Roper - some background information

Patrick Roper has worked as a consultant ecologist since 1993 within his own business, Patrick Roper Associates, based in Sedlescombe, East Sussex. He is a doctor of business administration, an elected fellow of the Linnean

Society and of the Royal Entomological Society and an elected member of the British Ecological Society. He was on the council of the British Entomological & Natural History Society from 2002 to 2004 and was a director of Butterfly Conservation and editor of its journal from 1990-1998. He was on the council of the Sussex Amphibian & Reptile Group and edited their newsletter for several years.

He managed the Rare Species Inventory for the Sussex Biodiversity Record Centre in a professional capacity and edited *Adastra*, their annual review of wildlife recording in Sussex for 12 years until 2013. He has given expert ecological evidence to recent public inquiries on major developments in East and West Sussex. He was a listed surveyor for Farm Environment Plans with Natural England's Rural Development Service.

He works closely with the Woodland Trust, both professionally and as a volunteer, on management plans and environmental statements for a number of conservation areas in East Sussex including the recently acquired Brede High Woods, one of their largest properties. He has been recently commissioned to write a 183 page book on Brede High Woods that was published in November 2013. He was chosen as their Volunteer of the Year for South East England in 2008.

He is on the conservation committee of Rye Harbour Nature Reserve and an honorary founder member of the Udimore Natural History Society.

Dr Roper is the recorder for two-winged flies (Diptera) in East and West Sussex. He has also studied an ancient woodland indicator, the wild service tree, *Sorbus torminalis*, for over 30 years during which time he coordinated the national survey of the species for the Botanical Society of the British Isles and the Biological Records Centre. He is author of a book on the tree published in May 2004 and a member of the Sussex Botanical Recording Society.

He is co-author of *Wooded Heaths in the High Weald*, a research report published by the Sussex Record Centre Survey Unit on behalf of the Weald Heathland Initiative (2004) and the subsequent paper *Ancient woodland or ancient heath? Re-examining the importance of wooded heaths in the Weald* (Proceedings of the 8th National Heathland Conference, 2004).

He has run courses and gives lectures on a variety of ecological and wildlife topics, has contributed refereed papers to a number of scientific journals and has contributed regularly to the Rye and Battle Observer newspapers. He was a member of the working party that revised the national Country Code in 1981 and a member of the committee for the establishment of Sites of Nature Conservation Importance (SNCIs) in East Sussex.

He has appeared on wildlife programmes on radio and television on many occasions including the national 2007, 2008 and 2009 Springwatches on BBC television as well as Countryfile and The One Show.

Clients for ecological work have included: Barefoot Yurts, Beauport Park Hotel, BdR Engineering, Brighton & Hove City Council, Bullens, Calverley Park Association, Canopy, CCM, Earthscapes Associates, Ecology Consultancy Ltd., Edburton Contractors, David I. Leigh Architects, G & F Pooke, Gemselect Ltd., Hastings Borough Council, Hawkins Brown, Hayland Developments Ltd., Helionix Designs, High Weald AoNB Unit, Horam Parish Council, J & J Design, Kent Design Partnership, Linda Bonnyman, Lseed Ltd., Mid Sussex District Council, National Trust, Oakdene Homes, Park Lane Homes (South East) Ltd., the Pines Calyx Centre, Robert D. Stokes, ROI Projects, Rother District Council, Royal Society for the Protection of Birds, Rye Harbour Nature Reserve, Simon Jones Associates Ltd., Smeeds Farm, Southern Water, Sussex Biodiversity Record Centre, Sussex Wildlife Trust, Wardell Armstrong, Wealden District Council, Weekes Consulting, Westridge Construction Ltd., West Sussex County Council, The Wetland Trust, The Woodland Trust and WoodNet. Many of these clients have returned several times with new commissions.

June 2014

Sedlescombe Parish Neighbourhood Plan: Final Local Green Space Report
September 2016

Appendix C

Extract from Sedlescombe Examiner's Report January 2015 of the withdrawn SNP

Policy 7: Local Green Space

Policy 7 seeks to designate two Local Green Spaces, Red Barn Field and Street Farm.

The Framework enables local communities to identify, for special protection, green areas of particular importance to them. It states that

"By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances." (para 76)

Local Green Space is a restrictive and significant policy designation. The Framework requires the managing of development within Local Green Space to be consistent with policy for Green Belts. Effectively, Local Green Spaces, once designated, provide protection that is comparable to that for Green Belt land.

The Framework is explicit in stating that

"The Local Green Space designation will not be appropriate for most green areas or open space." (para 77)

With consideration to the above, it is essential that, when designating Local Green Space, plan-makers can clearly demonstrate that the requirements for its designation are met. These requirements are that the green space is in reasonably close proximity to the community it serves; it is demonstrably special to a local community and holds a particular local significance (for example, because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife; and it is local in character and is not an extensive tract of land.

The designation of Red Barn Field is justified on the basis that it is in close proximity to the community, is local in character and is not an extensive tract of land. It is considered to be demonstrably special to the local community and to hold a particular significance due in particular to its recreational value and role as a nature park and important wildlife habitat.

Having considered the evidence and visited the site, I agree with each of these justifications. Consequently, the designation of Red Barn Field has regard to the Framework and meets the basic conditions.

Street Farm is also held to be in close proximity to the community, to be local in character and not to comprise an extensive tract of land. Whilst I agree with the first two points, I find the latter point to be more contentious.

Street Farm is many times larger than Red Barn Field. It stretches across an area of open land which I consider can only be described as extensive. In observing Street Farm, I noted that several full size football pitches, with land around each of them, could easily fit within it.

Submission Sedlescombe Parish Neighbourhood Plan
Final Local Green Space Report
Produced by Sedlescombe Parish Council
April Cottage, Church Road, Catsfield, Battle TN33 9DP
Tel: 07531 065469
September 2016