

Objection to DM/23/2867 (continuation from previous submission).

Now that I have read the majority of the documentation, I have the following comments to add:

1. The documentation provided in relation to the Parkland Reserve is inconsistent in many aspects and in my opinion makes this application null and void from the perspective of being able to make valid assessments. Of note is the Tadorna Consultancy Habitat and Restoration Management Plan* which is cited (in the Environmental Statement volume 2 chapter 10) as needing to be implemented in full to ensure benefits are realised yet it contains a different plan to that shown in the Detailed Masterplan. Some of the differences include the location of the cycle route and the position of the fencing.

* This document is loaded as Environmental Statement Ecology & Diversity_Parts 5 to 9 against DM/23/2866 and assumed to be applicable to DM/23/2867 from its content. The map shown at the beginning of part 9 is the one referred to above.

2. The biodiversity calculations only show the results for Beechy Bottom and not the input basis making it impossible for anyone to assess. Having said this, I believe that the basis that has been used to be flawed. On the one hand their documentation confirms that the area supports a wide range of wildlife, including multiple rare species, and priority habitats yet at the same time they seem to be suggesting that the AONB land has scope for significant biodiversity improvement sufficient to offset the damage caused at the Ansty Farm site. It is worth noting that according to Fairfax's own documentation 56% of the agricultural land is classed as Best and Most Versatile (BMV grade 2 and 3a) with the remainder being 3b (moderate), i.e. none of it is of low value.

(As stated in my earlier letter the biodiversity impact at the Ansty Farm site has also been under stated as they do not appear to include any reference to the lost vegetation/trees to create compliant visual splays for the new roundabouts and crossing points or to the offsite losses as a result of creating new foot way/cycle way, for example along the south side of the A272 to the north of the site.)

3. The Arboricultural Impact Assessment suggests that the only impacts are to trees 78, 79, 81, trees within plantations and trees in W37. The mitigation proposed for this is to use "no dig" construction specification. I have looked at the map shown in Part 2 and have identified the following trees as having proposed/repared fencing within the root protection area of the following trees, several of which are veteran or A quality (i.e. highest quality):

2, 7, 8, 9, 12, 13, G26, 23, 24, G25, G22, 21, G28, 58, 59, 60, G61, 67, 71

This is significantly more trees being impacted than stated. In addition, there is no specification of how many trees "within plantations" and "trees in W37" are to be removed to make way for the cycle path and rides. It is worth noting that the rides would be 10 metres wide and the cycle path itself will be 2.5 metres wide with 1 metre either side (i.e. 4.5 metres wide in total) so it seems highly probable that a significant level of tree removal would be required.

The Technical Details Document_Parts 1 to 3 provide specifications for the fences, cycle paths, new gates etc, the key details are provided below:

- Fence posts will be secured with cement and ballast on top of aggregate at a depth of about 1M.
- Rolled hoggins for cycle path will have wooden pegs in the ground at a depth of at least .5M with 150mm compacted aggregate topped with 30 to 50mm rolled hoggins.

- Stiles for the footpath will have ballast and cement at a depth of about 0.9M.
- Pedestrian/cycle stiles also need about 0.9M depth of ballast.
- Gates all require at least 0.7M depth and use cement and ballast.
- Cement and ballast also used for lecterns and signposts.

Whilst fence posts can be carefully positioned to avoid tree roots, there are places where it looks inevitable that these would need to be positioned within a root protection area and therefore a no dig specification is simply not possible. I also don't believe it is possible to install the wooden pegs required for the cycle path using a no dig approach. Therefore, I can only conclude that the amount of damage to trees, their roots and to the flora and fauna is significantly understated.

Further to the above, the construction of the cycle path and fencing would require a lot of material to be moved on site with the potential to cause a lot of damage.

4. The idea of creating a Parkland Reserve on a site that is part of the High Weald National Landscape (formerly referred to as AONB) seems to be completely at odds with the core values of retaining its distinctive historic landscape character and natural beauty. Changing from farmland (which is part of its distinctive historic landscape) to a Parkland Reserve is nothing to do with the following extract from the High Weald AONB Management Plan:

“The natural beauty of the High Weald comprises

- Five defining components of character that have made the High Weald a recognisably distinct and homogenous area for at least the last 700 years.

1) Geology, landform and water systems – a deeply incised, ridged and faulted landform of clays and sandstone with numerous gill streams.

2) Settlement – dispersed historic settlement including high densities of isolated farmsteads and late Medieval villages founded on trade and non-agricultural rural industries.

3) Routeways – a dense network of historic routeways (now roads, tracks and paths).

4) Woodland – abundance of ancient woodland, highly interconnected and in smallholdings.

5) Field and Heath – small, irregular and productive fields, bounded by hedgerows and woods, and typically used for livestock grazing; with distinctive zones of lowland heaths, and inned river valley”.

To maintain the High Weald National Landscape does NOT mean changing it to a poor version of a re-wilding project to suit ONLY the purposes of a building developer. It means caring for the natural assets that are already there for the benefit of current and future generations.

As already stated in so many of the objection letters received, there is no benefit to the local residents as we already have access to this area by several footpaths that cross the site and there is no desire for this highly valued local asset to be changed in anyway, just for it to be maintained in accordance with the AONB Management Plan.

Where Fairfax are attempting to claim biodiversity credits for things like improving ponds on their land that are known to be polluting the water course, they should be doing this anyway and this is not something to benefit from. It should not be possible to use maintenance of an AONB to offset devastation caused at the Ansty Farm site, which as it happens is land of equivalent value to that of the AONB (as documented in an earlier version of the MSDC District Plan).

5. The final point is to highlight the futility of Fairfax's so-called re-wilding. As Fairfax have chosen to reference the Knepp Castle Estate, some of the key differences are given below:

- The Knepp Castle Estate is around 3500 acres in size whereas the area available to cattle and other animals within the Beechy Bottom site is around 100 acres.
- The Knepp site does not fence off the areas within the site (just the perimeters) whereas Beechy Bottom (according to the Masterplan) will have two small areas for animals that are fenced off the entire way around.
- The Knepp site is not constrained by being set within a National Landscape site, whereas Beechy Bottom is.
- The Knepp Castle estate has herds of cattle, pigs, ponies and deer that roam the estate. Beechy Bottom would have 13 cattle, 3 pigs, 13 deer and 15 hare contained within 2 relatively small fenced off areas with the exception of those that would escape.

As pointed out in the representation letter submitted by the Knepp Castle Estate, the type of fencing proposed would not contain the pigs or the deer. Furthermore, they maintain a mown border of 100 metres to prevent spread of ragwort and creeping thistle to neighbouring properties which if applied at Beech Bottom would seriously reduce the land available within which to contain their animals. Perhaps more damningly is the point that whilst they are proponents of re-wilding they view Beechy Bottom as "half-baked".

In conclusion, I strongly urge the council to reject this application in line with the MSDC District Plan.