WEALDEN LOCAL PLAN EXAMINATION

Additional comments Stage 1:

Your Agenda item HRA: Point 30

Does the evidence in the HRA support the assertion that suitable air quality mitigation measures are no longer required for the Pevensey Levels SAC and Ramsar Site within Policy AF1?

(Additional to my original comment made at Point 39.1 (view) Natural Environment)

The massive increase in development in Hailsham, Hellingly and Polegate will require stringent monitoring of air quality and as a resident of Hailsham I do not feel that we are being considered with regard to the health issues associated with NOx. An Air Quality Assessment on the impact of growth on Pevensey Levels SAC and RAMSAR site (point 5.29 on the Plan) showed that baseline critical levels for NOx are predicted to be exceeded, and there are currently no monitors in or around Hailsham or Pevensey Levels making official recordings of the most deadly PM2.5 and PM20 levels. The only monitor recording PM2.5 is at Holly Place in Eastbourne which is too far from Pevensey Levels and Hailsham to be used in any HRA. Any HRA carried out without this data cannot be relied on for any assessment of whether mitigation measures are required or not.

Due process is not being carried out on HRAs on applications for development next to Pevensey Levels. On 31 May 2018 the Natural England response to just one of the many major planned developments on the edges of Pevensey Levels (Planning Application WD/2017/0458/MAO for land at Marshfoot Lane) clearly stated that the Wildlife Habitat Surveys had not been carried out of overwintering birds. Yet the Wildlife Management Plan was approved when no Breeding and Wintering Bird Surveys have yet been done and the Planning Application accepted by WDC. Pevensey Levels is designated SSSI for its breeding lapwing and suite of wintering birds as well as wetland plants and invertebrates. The site supports an outstanding assemblage of wetland plants and invertebrates including many British Red Data Book Species. The site supports 68% of vascular plant species in Great Britain that can be described as aquatic. It is probably the best site in Britain for freshwater molluscs, one of the five best sites for aquatic beetles Coleoptera and supports an outstanding assemblage of dragonflies Odonata (over 15 species recorded including several scarce species).

One of Britain’s largest and rarest spiders, the Fen Raft spider ( Dolomites Plantarius) has its stronghold at Pevensey.

The lowland wet grassland supports a variety of bird species including Wintering Lapwing, Snipe. Breeding birds include Sedge Warblers, Reed Warblers, Yellow Wagtail.
A 2009 RSPB report found the above plus Linnet, Meadow Pipit, Singing Skylarks, Reed Bunting, 5 different types of Heron including the rare Night Heron and Cattle Egret.

Floating and submerged aquatic plants include duckweeds (Lemna), pondweeds (Potamogeton), waterfern (Azolla), frogbit (Hydrocharis Morsus ranae) Burr Reed (Sparianium Erectum), Arrow-Head (Sagittarius Sagittifolia), Common Reed (Phragmites Australia), Hawthorn (Crataegus Monogyna).

Plus rich bankside flora: Yellow Horned Poppy (Glaucium Flavum) and Sea Campion (Silene Uniflora).

There is a lack of evidence to enable the success of any emissions mitigation to be quantified. I believe mitigation is essential for Pevensey Levels SAC/Ramsar within Policy AFI.