

Rother Local Plan Regulation 18 Consultation

Please find below the representation from **Sussex Butterfly Conservation (BC)** on the above consultation. Butterfly Conservation is the UK charity dedicated to saving butterflies, moths and our natural environment. We are a world-leading authority on the conservation of these beautiful and vital creatures. Butterfly Conservation's strength derives from its 32 Branches and over 40,000 members who help to deliver our key aims to:

- Halve the number of the UK's threatened species of butterflies and moths
- Improve the condition of 100 of the most important landscapes for butterflies and moths
- Transform 100,000 wild spaces in the UK for people, butterflies and moths

Sussex BC is a member of the Sussex Local Nature Partnership and has recently made comments on the draft Sussex Local Nature Recovery Strategy.

Butterflies are highly sensitive indicators of the health of the environment and play crucial roles in the food chain as well as being pollinators of plants. In addition, many butterflies and moths are designated in conservation terms as "Priority Species" being species most under threat because of their rarity and/or rate of decline.

In the UK, long-term trends show that 80% of butterfly species have decreased in abundance or distribution, or both since the 1970s. On average, UK butterflies have lost 6% of their total abundance at monitored sites and 42% of their distribution over the period 1976-2019.¹

The total abundance of larger moths caught in the RIS light-trap network in Britain decreased by 33% over 50 years (1968–2017). Losses were greater in the southern half of Britain (39% decrease).²

Government policy (NPPF; paragraph 185) requires that to protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

¹ Fox R, Dennis EB, Purdy KM, Middlebrook I, Roy DB, Noble DG, Botham MS & Bourn NAD (2023) The State of the UK's Butterflies 2022. Butterfly Conservation, Wareham, UK.

² Fox R, Dennis EB, Harrower CA, Blumgart D, Bell JR, Cook P, Davis AM, Evans-Hill LJ, Haynes F, Hill D, Isaac NJB, Parsons MS, Pocock MJO, Prescott T, Randle Z, Shortall CR, Tordoff GM, Tuson D & Bourn NAD (2021) The State of Britain's Larger Moths 2021. Butterfly Conservation, Rothamsted Research and UK Centre for Ecology & Hydrology, Wareham, Dorset, UK.

In this context Sussex BC wish to make a positive contribution to the Rother Local Plan consultation to ensure that butterflies and moths are protected from development and opportunities for increasing and enhancing their populations and habitats are secured.

The current consultation document includes the identification of a large number of housing site allocations as well as those for employment and other uses. Butterfly Conservation would welcome a dialogue with Rother DC on the matters raised below and would be very happy to provide further advice on delivering the measures suggested as appropriate.

Please find our detailed comments set out below:

1. General themes:

Butterfly Conservation notes the 11 strategic objectives for the Local Plan and in particular the first three as follows:

1. *Mitigate and adapt to climate change, including by Deliver delivering net zero carbon ambitions, reducing flood risk from all sources and promoting the multifunctional benefits of green blue infrastructure through effective and supportive planning policies.*
2. *Maximise opportunities for nature conservation, recovery and biodiversity net gain and preserve the historic landscape character of the High Weald National Landscape and protected habitat areas of Rother and ensure sensitive development that allows communities to thrive.*
3. *Promote high quality, inclusive design and protect and enhance the significance of Rother's built and natural heritage, including its setting, while providing opportunities for recreation and tourism.*

We strongly support these objectives and thus would like to see the following measures addressed and incorporated into the policies of the Local Plan so that they apply generally to all development delivered in Rother district. These measures relate to habitat creation for butterflies and to reducing light pollution to protect moths. Recommended policy wording is set out below.

a) "From the outset new development design should incorporate the creation of wildlife habitats to benefit butterfly species"

Consideration should be given to design which assists butterfly species at all stages of their lifecycle. Features could include:

- a. Butterfly banks – E shape
- b. Nectar planting
- c. Caterpillar food plants
- d. Areas for overwintering adults/pupae

b) "New development and local green spaces should be designed and planned from the outset to minimize light pollution which could affect moths."

Measures could include:

- a. Considering appropriate lighting options including siting of light sources for new development
- b. Creating Moon Meadows – green spaces free from light pollution. <https://butterfly-conservation.org/join-the-dark-side>
- c. Plant moth-friendly plants alongside no-mow wild areas, in an area free from artificial light.

2. Ecological assessments

We note that the requirements for development on many of the site allocations refer to areas for Biodiversity Net Gain, Landscape and Ecological Management Plans, multifunctional Green Infrastructure corridors, and ecological enhancements. We support these requirements and ask that they will include delivery of the measures above. Such improvements will need to be based on comprehensive ecological surveys and we would request that such assessment includes examination of the presence of butterfly and moth species. We would particularly note that to adequately establish which species are present, single surveys are likely to be inadequate, particularly as they will not capture the staggered emergence (as adults from pupae) periods of different species. In addition to visual surveying for adult butterflies, additional methodologies, such as UV searching for larvae and pupae, and winter egg surveying (for Brown Hairstreak eggs) may be appropriate.

While we do not have sufficient knowledge of the individual sites in the Rother Local Plan, we note that their general geographic location makes it a possibility that priority species Grizzled and Dingy Skipper, both very small, inconspicuous and easily overlooked species which emerge in the spring, could be present. White-letter Hairstreak, an Elm dependant (as it's larval food) species could also be present if Elm exists at specific sites, and Brown Hairstreak, similarly dependant on Blackthorn, are expanding eastwards throughout East Sussex and Kent and their colonisation of Rother District in the relatively near future is to be anticipated. The adult butterflies of both these Hairstreak priority species spend much of their time in the canopy of large trees, and can be difficult to locate, even when present at a site. Ecological site surveys and assessments should therefore take account of the possible presence of all of these priority species.

3. Particular Opportunities:

There are many allocations identified in the consultation document which are large both in area and scale of development. These sites would provide particularly good opportunities to incorporate butterfly habitat creation features as well as design to minimise light pollution for moths and we request that these principles are taken into account. In some cases there are sensitive habitats, especially hedgerows, at the edges and on the boundaries of the sites so particular care of these should be taken to protect and enhance these within the development design. We assume that an ecological assessment of the site including for butterflies and moths (as in 2. above) would take place before the development is designed.

4. Site allocations

a) With regard to light pollution, we note two sites that by nature of the proposal may require careful design for moths and other species;

BX28 Land at Northeye and adjoining land: some 384 dwellings; community uses which could include outdoor sports facilities including formal playing pitch(es).

BX25 Land at Barnhorn Green for Medical centre/light industrial which requires “a sensitive lighting strategy to avoid impacts on protected species and neighbouring amenity”.

b) We note that White Admiral, a priority species, primarily of woodland, and dependant on Honeysuckle as larval food, are recorded adjacent to sites **BX23**, **BX24** and **BX38**, and could potentially occur in proximity to other sites. Ecological surveys should therefore also take account of the presence of this species.