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Councillors on this Committee:

EX OFFICIO Cllr A Harman (Chair of Council), Cllr W Veck (Vice Chair of Council)

Cllr S Griffiths (Chair), Cllr A Hart (Vice Chair) Cllr I Sharkey, Cllr M Campbell, Cllr Mills, Cllr Gordon-Garrett,
Cllr Harman,

28th October 2026

Dear Committee Member,

You are summoned to a meeting of the **ENVIRONMENT AND SUSTAINABILITY COMMITTEE** which will be held in the Anzac Room, Community House, Peacehaven on **Tuesday 3rd November 2026 at 7.30pm**

A handwritten signature in black ink, appearing to read "G Dyson".

George Dyson
Town Clerk

A G E N D A

GENERAL BUSINESS

- 1 ES38 CHAIR ANNOUNCEMENTS:** *Including taking 1 minutes reflective silence.*
- 2 ES39 PUBLIC QUESTIONS** - *There will be a 15-minute period whereby members of the public may ask questions on any relevant Planning & Highways matter.*
- 3 ES40 TO CONSIDER APOLOGIES FOR ABSENCE & SUBSTITUTIONS**
- 4 ES41 TO RECEIVE DECLARATIONS OF INTEREST FROM COMMITTEE MEMBERS**
- 5 ES42 TO ADOPT THE MINUTES FROM THE 30TH JUNE 2026**
- 6 ES43 TO DISCUSS AND AGREE RECOMMENDATIONS IN A REPORT REGARDING NATURE RECOVERY AND BIODIVERSITY.**
- 7 ES44 TO REVIEW & UPDATE THE COMMITTEE ACTION PLAN AND AGREE ANY ACTIONS REQUIRED**
- 8 ES45 TO AGREE REQUESTS ON ITEMS RELATING TO THIS COMMITTEE WHICH SHOULD BE INCLUDED ON THE COUNCIL BUSINESS PLAN**
- 9 ES46 TO DISCUSS AND AGREE RECOMMENDATIONS REGARDING THE TOOLS THAT COMMITTEE WILL NEED TO FULFIL OUR TERMS OF REFERENCE**
- 10 ES47 TO RECEIVE UPDATES FROM TASK & FINISH GROUPS (TFGs)**
 - a. Biodiversity Report TFG
 - b. E&S Action plan TFG
 - c. Climate Policy
- 11 ES48 TO AGREE DATE FOR THE NEXT MEETING TUESDAY 9TH MARCH 2026 AT 7.30PM**



Draft Minutes of the meeting of the Environment & Sustainability Committee meeting held in the Anzac Room, Community House on 30th June 2026 at 7:30pm.

Present: Cllr S Griffiths (Chair), Cllr I Sharkey, Cllr M Campbell, Cllr Mills, Cllr Gordon-Garrett, Cllr Harman, Cllr Rosser

Officers: Zoe Polydorou (Meetings & Projects Officer)

1 member of the public was in attendance.

1 ES28 CHAIR ANNOUNCEMENTS

The Chair opened the meeting at 19:35, welcomed members to the meeting, ran through the Civility and Respect statement, explained the fire procedure, reminded committee of the mobile phone protocol, that the meeting was being recorded.

2 ES29 PUBLIC QUESTIONS - *There will be a 15-minute period whereby members of the public may ask questions on any relevant Environment & Sustainability matter.*

There was 1 public questioner who expressed sustainability proficiency and was keen to know how to contribute to the committee. They commented on the recent PTC Sustainable Living Fair and queried how it converted into something more meaningful, and raised that Peacehaven was a heritage site but not well known. They commented on external groups they are part of.

The Chair suggested the member of public join some TFGs, and members thanked them for their attendance.

3 ES30 TO CONSIDER APOLOGIES FOR ABSENCE & SUBSTITUTIONS

Apologies were received from Cllr Hart, with Cllr Rosser as substitute.

4 ES31 TO RECEIVE DECLARATIONS OF INTEREST FROM COMMITTEE MEMBERS

There were no declarations of interest.

5 ES32 TO ELECT A VICE CHAIR OF THIS COMMITTEE

It was proposed to elect Cllr Hart as Vice Chair of this committee

Proposed by: Cllr Sharkey **Seconded by:** Cllr Gordon Garrett
Committee **resolved** to **elect** Cllr Hart as Vice Chair of this committee.

6 ES33 TO ADOPT THE MINUTES FROM THE 10TH MARCH 2026

Proposed by: Cllr Mills **Seconded by:** Cllr Campbell
Committee **resolved** to **adopt** the minutes.

7 ES34 TO AGREE THE RECOMMENDATIONS IN THE REPAIR CAFÉ REPORT

Cllr Sharkey outlined their report, and commented on being pleased with project progress. Members discussed day options, the importance of alternating with other local Repair Cafes, queried the repair logistics, and positive comments were put forward about the project.

The Meetings & Projects Officer summarised the recent meeting with Saltdean's Repair Café, ran through the results of the Repair Café survey on screen, explained that funding had been applied for, and emphasised that the PR Officer would

manage the marketing, but there was insufficient Officer time to run and manage the events.

Members understood that the project was Councillor led, and concern was raised over PTC reputation with volunteers managing the event, whereby the Meetings & Projects Officer emphasised that the office would manage the marketing.

Cllr Mills raised that his wife was qualified as a PAT tester.

It was proposed to agree to a Repair Café.

Proposed by: Cllr Sharkey **Seconded by:** Cllr Gordon-Garrett
All in **favour**

It was proposed for the café to run on a Saturday.

Proposed by: Cllr Campbell **Seconded by:** Cllr Rosser
All in **favour**

It was proposed to set up a Peacehaven Repair Café TFG

Proposed by: Cllr Sharkey **Seconded by:** Cllr Campbell
All in **favour**.

Members: Cllr Sharkey, and all Councillors to be invited.

8 ES35 TO AGREE PTC ACTIONS TO IMPROVE OUR SEA AND SHORELINE

Cllr Griffiths outlined the report. Cllr Campbell mentioned it had been a Business Plan item, and it was agreed in 2023 to care for assets of green and blue assets, where monitoring the cleanliness of the sea close to Peacehaven had been discussed.

Members discussed that Peacehaven beach and the clifftop was regularly litter picked, that any vandalism in that area be reported, including to LDC, Cllr Rosser mentioned the possibility of a dinosaur dome on the seafront in terms of an investment consideration; whereby the Chair clarified confirmed it was not PTCs responsibility. Cllr Mills suggested being happy to lead walks.

It was proposed to set up a TFG and to include discussion of a sea cleanliness monitor.

Proposed by: Cllr Campbell **Seconded by:** Cllr Gordon-Garrett
All in **favour**.

Members: Cllr Harman, Cllr Griffiths, and all Councillors to be invited.

20:26 – Cllr Campbell left the meeting

8 ES36 TO RECEIVE UPDATES FROM TASK & FINISH GROUPS (TFGs)

a. Biodiversity Report TFG

No update made.

b. E&S Action plan TFG

It was proposed that item 9 be carried out under the Biodiversity TFG remit.

Proposed by: Cllr Sharkey **Seconded by:** Cllr Gordon-Garrett
All in **favour**.

It was proposed to agree to the Action Plan revisions, apart from the ones with comments from the Meetings & Projects Officer suggesting possible removal

Proposed by: Cllr Campbell **Seconded by:** Cllr Mills
All in **favour**.

20:29 - Cllr Campbell rejoined the meeting

c. Climate Policy
No update made.

The Chair suggested the member of public may be interested to join a TFG.

- 10 ES37 TO AGREE DATE FOR THE NEXT MEETING TUESDAY 3RD NOVEMBER 2026 AT 7.30PM**
The next meeting was **agreed**.

There being no further business, the meeting was closed at 20:42



Committee	Environment and Sustainability	Agenda Item:	ES43
Meeting date:	November 3 2026	Authors:	Cllrs Campbell and Wood
Subject:	PTC's Biodiversity and Nature Recovery Policy		
Purpose:	To Agree Next Steps on Biodiversity and Nature Recovery		

Recommendation(s):

Agree recommendations for progressing biodiversity & nature recovery policy.

1. Background

'The biosphere, upon which human life on the planet depends, is being altered to an unparalleled degree across the world'; 'nature is declining globally at rates unprecedented in human history and the rate of species decline is accelerating'; 'the UK is now one of the most nature-depleted countries on earth'; 'across the UK, species studied have declined by an average 19% since 1970 with nearly 1 in 6 of identified species threatened with extinction within GB.'¹

The four national policy aims developed as a result of these governmental conclusions are:

- Improve the quality of protected sites on land and at sea – many are in poor condition
- Create more, bigger and messier places for wildlife
- Reduce pollution on land, notably pesticides and excess fertilisers and reduce the pressure on water environments
- Identify target species for recovery action which is effective when applied to a high proportion of species population and key to bringing back lost species

Since the January 2021 Environment Act, new biodiversity, water and air legislation has developed national targets:

- Restore or create 500,000 hectares of wildlife-rich habitat **outside** protected sites, identifying the most productive locations [our emphasis]
- Halt the decline of species abundance by 2030 and increase the 2030 level by at least 10% by 2042, including by maintaining wildlife connectivity [often referred to as 'corridors']
- Increase total tree and woodland cover, particularly where this benefits biodiversity
- Improve water quality and availability

¹Natural England's 'State of Nature' Report 2023; *Biodiversity Loss*, House of Commons Library Debate Pack, May 2024.

These aims are being implemented via a number of routes.

- **Planning Decisions.** (a) In 2024, biodiversity net gain was made mandatory for most developments, although developments under 0.2 hectares in size have been exempted since August 2026. Planning Applications are encouraged to propose terms to be included in a section 106 agreement.² Although Applications cannot be refused because biodiversity net gain cannot be achieved, Planning Authorities 'may need to consider more broadly whether the biodiversity net gain condition is capable of being successfully discharged'.³ Payments for off-site biodiversity enhancement can mean payments to eg a National Park rather than local net gains. In Lewes District, central government's requirement to identify more land for housing has already intensified the threat to biodiversity.⁴ (b) Because so much of Peacehaven is within the South Downs National Park (SDNP) or on its boundary (and Peacehaven has no railway station), planning rules protecting biodiversity outside the settlement boundary may in effect, be stronger than average here, especially in the areas close to the SDNP boundary. Inspectors have upheld Lewes District Council (LDC) decisions to refuse permission close to the SDNP boundary where wildlife and biodiversity need to be protected by night skies, tranquillity and other rules that apply in the context of National Parks.⁵
- **Specific requirements on Local Councils.** Town Councils now have a statutory duty to develop a biodiversity policy. For Peacehaven's Policy, see Appendix A. The Town Council has already implemented a habitat biodiversity audit of three of its Parks (by Ouse Valley Climate Action OVCA) and, via Planning Committee, fulfils the policy in its responses to Planning Applications. PTC provides for over 80 allotments (mostly small – there is waiting list). It has provided sites and support for local volunteer organisations that run a Community Orchard (in Centenary Park) and a Community Garden (in the Oval park). It has almost eliminated use of damaging pesticides on land it owns. This Report identifies possible further action to progress PTC's nature recovery and biodiversity policy.
- **Development of Local Nature Recovery Strategies.** Mandated by law, these have mapped areas of importance, established and involved via consultation and engagement with local organisations and individuals and including all the land not owned by local authorities. Peacehaven falls within the East Sussex and Brighton and Hove Local Nature Recovery Strategy (ESB&HLNRS) area, with the Policy published in June 2026. Unfortunately, it seems that PTC, which was at the forefront of so many other 'Green' initiatives in East Sussex, did not participate in the development of this Strategy, including consultations, and this is reflected in the text of the ESB&HLNRS. This Report to PTC Environment and Sustainability Committee takes the first step towards achieving the PTC policy 'to review local nature recovery strategies, species conservation strategies, protected sites strategies....and consider in general how it may become more involved in implementing the strategies' recommendations' and try to raise the profile of Peacehaven in both ESB&HLNRS. PTC-owned land, SDNP land and protected sites are not islands: biodiversity changes in the rest of Peacehaven have the power to determine biodiversity changes within PTC-owned land and within the SDNP and protected sites.

Further details on particular topics and issues, including sources of advice and expert local organisations, are set out in Appendix B. Appendix C summarises the habitat and species biodiversity issues specific to Peacehaven under four

²Government Guidance on Biodiversity net gain, Ministry of Housing Communities and Local Government and Dept for Levelling Up Housing and Communities, Feb 2024, as updated July 31 2026 para 105 Ref ID: 74-015-20240214

³Op cit Para 019, ref Id: 74-019-20240214

⁴The Dewdrop site in Steyning Avenue, for example, has been granted planning consent for new flats despite evidence of rare barbastelle and other bats (Planning App LW/25/0224); in Downs Walk, planning consent for development on a site wrongly stated to be 1.5km from the SDNP resulted in the destruction of trees of significant public amenity with TPOs on them, as well as the loss of hedgerows etc.

⁵Planning Inspectors rejecting Appeals against LDC refusal of planning consents cite eg a legal requirement that 'development within the setting of a National Park [ie close by] should be sensitively located and designed to avoid or minimise adverse impacts upon it'. See eg Planning Application APP/P14425/W/24/3346977, Blakeney Avenue. The same provision was also a major factor cited in relation to a site in the Valley Road area of north Peacehaven by an Inspector refusing an Appeal (LW/24/0105).

heads: PTC-owned land; 'Protected' sites (such as Site of Special Scientific Interest- SSSI) in Peacehaven; assessment of non-protected sites in relation to government policy to preserve and restore 500,000 hectares of non-protected land (and increase trees) by 2042; and the coast. Appendix D contains the Advice Recommendations from OVCA for promoting biodiversity (both habitats and species) in three PTC Parks: The Dell, Centenary Park and the Oval.

It will be some months before E&S Committee meets again, with little time for achievement before the next Town Council election in May 2027. So the recommendation in this Report is to approve the following, subject to confirmation by the Nature Recovery or Biodiversity TFGs which reports to Full Council (and could also propose other items).

- Request Personnel Committee to add a voluntary biodiversity/nature recovery module to the training schedule for all PTC Officers and Councillors (see Appendix B, para 1.1)
- Request Planning Committee to assess biodiversity net gain issues (including how biodiversity net gain monies could be attracted into Peacehaven) and specific habitats/ species recovery measures for comment in Planning Applications (see Appendices B and C)
- Request the biodiversity TFG to urgently meet and bring recommendations back to Committee to move forward with the proposals from OVCA on improving biodiversity in PTC Parks (see Appendix A on PTC Policy, Appendix B para 3.3, Appendices C and D)
- Request Community Engagement Committee to contact residents and PCS with a view to building a team of volunteers for biodiversity protection and regeneration projects (See eg Appendix B, para 2.1 and 2.2)
- Request the Nature Recovery TFG to prepare proposals that would maximise the nature recovery benefit of any sites in the Valley Road that PTC might own in future
- Request the Nature Recovery TFG to make recommendations on the relative prioritisation for action of the potential sites summarised in Appendix C, including liaison with relevant external stakeholders.
- Request the Nature Recovery TFG to consider whether to put forward any further areas to the ESB&HLNRS for designation as areas of potential importance for biodiversity (ACIB)

2. Options for Council

To Agree the Recommendation

To Amend the Recommendation

To Reject the Recommendation

3. Reason for recommendation

To comply with National and PTC policy; to raise the profile of Peacehaven within the development of East Sussex and B&H Nature Recovery Strategies and actions; to improve biodiversity and nature recovery in Peacehaven; to support community initiatives promoting nature recovery.

4. Expected benefits

Possible benefits include: saving some species from local extinction (it is probably already too late for many that are officially recorded as existing locally within the last forty years)⁶; improving the condition of protected sites; nature recovery and improvement in PTC-owned sites; prioritisation in relation to habitat and species biodiversity of sites that are not protected; improvements in health and nature-awareness among residents; ripple effects into increased nature-related leisure and employment.

Implications

5.1 Legal	NPPF 2026 and other national legislation, LDC local Plan, NDP, East Sussex and B&HCC Nature Recovery Strategies, SSSI & other protected designations, national targets (especially for sites not formally protected)
5.2 Risks	That habitat and species biodiversity in Peacehaven is lost, with much wider effects, if action is not taken urgently
5.3 Financial	Biodiversity net gain monies, grant and other monies for Nature Recovery
5.4 Time scales	Immediate and continuing
5.5 Stakeholders & Social Value	All pedestrians, habitat and species biodiversity, coastal biodiversity
5.6 Contracts	
5.7 Climate & Sustainability	Essential, and hitherto inadequately cared for in PTC
5.8 Crime & Disorder	
5.9 Health & Safety	Trees and access to nature is now of recognised value for health; safety issues outside settlement boundary
5.10 Biodiversity	Habitat and species biodiversity protection and Nature Recovery are at the core of this Report
5.11 Privacy Impact	
5.12 Equality & Diversity	

5. Values & priorities alignment

Which of the Core Values does the recommendation demonstrate?	
6.1 Empowering and supporting the community	X
6.2 Growing the economy sustainably	X
6.3 Helping children and young people	X
6.4 Improving the quality of life for residents and visitors to Peacehaven	X
6.5 Supporting residents in need	X
6.6 Valuing the environment	X
6.7 Which business plan item(s) does the recommendation relate to?	
Assets of Nature and Biodiversity, Green Infrastructure Plan	

6. Appendices

Appendix A PTC Biodiversity Policy

See separate attachment

APPENDIX B: Topics, Issues and organisations

⁶ Examples of species that have been officially recorded in the area, but without recorded sightings for over a decade: hen harrier, whiskered bat

1. General

1.1 Training: Biodiversity and Nature Recovery, a policy requirement for Town Councils since 2024, have in the past not been the subject of formal training for officers or councillors. Such training needs to include updates resulting from the August 2026 NPPF and other recent changes. Royal Institute of Chartered Surveyors (RICS) provided a one-hour overview UK Statutory Guidance on local nature recovery strategies (not including planning, which should be covered by planning-specific training). A course for Town Councils and others on implementation of biodiversity regeneration is being developed by OVCA as one of its last projects.

1.2 Local Nature Recovery Strategies (LNRS): After years of consultation and preparation East Sussex County Council (ESCC) and Brighton and Hove City Council (B&HCC) published a joint LNRS in June 2026. This focuses mainly on habitat mapping, but also identifies specific species for regenerative action. This will determine priorities within ESCC and B&H.

Habitat Recovery

2.1 From Weald to Waves A network of groups from local councils to farmers, schools and gardeners establishing a 100-mile landowner-led nature recovery corridor from the Weald to the Sussex coast. Recently worked with Peacehaven Community School on projects to clean up the east end of Peacehaven undercliff. Projects include 'the 100-mile classroom: landscape learning for the next generation'. Free practical advice. PTC could consider joining it. [wealdtowaves.co.uk]

2.2 Greenhavens Network A registered East Sussex charity that connects over 100 community groups, conservation projects and local volunteers. Training sessions on rewilding initiatives (greenhavens.network, wildergardens@greenhavens.network)

2.3 Ouse Valley Climate Action A National Lottery funded programme 2022-2026 that brought together and sponsored projects including several in Peacehaven.

2.4 Changing Chalk Now also ending, this was a four-year landscape-scale partnership programme 2022-2026 led by the National Trust. Delivering 21 interconnected projects across the eastern South Downs, and a Community Grants Scheme, it restored chalk grassland and much else.

3. Species biodiversity and nature recovery

Habitat mapping can be done effectively from the air and helps to define whether a species *could* exist at a particular site. Whether a species *does* exist at any site is much more difficult and expensive to research and record. Mapping **species** biodiversity is very difficult since records depend on the extent to which volunteers and others send sightings and evidence to the Sussex Biodiversity Records Centre (SxBRC) and on the timing of ecological surveys: an ecological survey of invertebrates in December is unlikely to give a full picture of the butterfly population! This Appendix summarises current issues (including legal protections, if any) in connection with some species and lists some go-to organisations. Sources for what follows include eg the RSPCA, RSPB.

3.1 Badgers: The Protection of Badgers Act 1992 aims to stop cruelty to badgers and badger setts. If a potential site for a road or housing contains an occupied badger sett, planning permission may still be given as long as the correct measures are taken to protect the sett. The sites of badger setts are not listed by SxBRC. Badger setts are widespread in Peacehaven. Without knowing where they are, it is difficult for Planning Officers in PTC or LDC to protect them, making it difficult to implement the law. The Badger Trust Reporting Centre (Badgertrust.org.uk or secretary@badgertrust-sussex.org.uk) keeps a record of sett locations it is informed about. Locally, see also South Downs Badger Protection Group for emergency numbers. Badgers sets are known to exist in many parts of Peacehaven, even south of A259, and notably in the Valley Road area.

3.2 Bats: All bats are legally protected by national and EU laws. Roosts are protected year-round. Planning Applications can need an ecological survey. For details, see Bat Conservation Trust (Bats.org.uk). Several varieties of bats have been recorded right across Peacehaven. ⁷See also Sussex Bat group (contact@sussexbatgroup.org.uk). Anecdotal evidence suggests that bat numbers have been declining due to housing development but are still widespread. Data from SBRC record at least ten species, almost all of them with sightings recorded within the last ten years.

3.3 Bees: Bees have no legal protection in UK, although some bee species appear on England's section 41 priority list (which guides conservation but does not grant legal immunity). SxBRC records sightings of around 20 different bee species locally in the last 40 years with about a quarter having no sightings reported since 2020. Policies requiring the inclusion of bee bricks in Planning Consents have been promoted, especially for urban areas: but questioned on the grounds of evidence that they are often used by other insects, can be the wrong size and may need cleaning to prevent them encouraging disease. Less controversial are programmes to support pollinators by increasing diversity of plant species across the landscape. SDNP Trust 'Beelines' initiative is working with landowners across the South Downs but restricts its funding to initiatives within the South Downs. Now that OVCA has ceased to exist as a source of funding, other potential funding sources may need to be organised in Lewes District.

3.4 Birds: Stretching from the heights of the South Downs to the sea coast, Peacehaven contains a broad range of bird species. With its intermixed habitats of grass, scrub and woodland, inland species are especially concentrated in the Valley Road area where residents have recorded nesting sparrowhawks, buzzards, kestrels and owls. Many other birds ranging from woodpeckers to greenfinches are common (see SxBRC). At the coast, the bird population is different, with varieties of gulls, rock pipits and occasional egrets, herons and oyster-catchers. Swifts, that come back to the same nest year after year, have declined sharply and are now red-listed. B&HCC requires integration of swift bricks or boxes on new developments that are 5 metres or higher: the TFG could consider whether PTC should adopt the same policy in its responses to planning consultations and in its own building programme. [Sussex Ornithological Society, info@seafordswifts.org.uk]

3.5 Butterflies and moths: At the coast, many of the butterflies and moths seen in Peacehaven are migrants from across the Channel. In the Valley Road area, a resident amateur lepidopterist has kept private records for many years that show high levels of species (several hundred different moths and butterfly species recorded as having been seen), indicating the potential wealth of Peacehaven habitat. The action plans for increasing plant biodiversity in the PTC Parks for the benefit of butterflies and moths are set out in Appendix D.

3.5 Other land species: Great crested newts are now thought to be extinct in Peacehaven. However, reptiles and amphibians are widespread. As are badgers and bats. A two hour survey of one field in the Valley Road area of Peacehaven in 2023 yielded SxBRC records of several protected and designated species of invertebrate: but species recording of invertebrates has been sadly lacking.

3.6 Beach and sea species: [see section on the coast below]

3.7 Invasive species the SxBRC records show 208 records of 28 invasive non-native species within a two kilometre radius of Peacehaven Heights. SxBRC records show 73 records of 18 invasive non-native species within a 1 kilometre radius of the centre of the Valley Road area. The TFG might want to consider whether any of them are significantly damaging native biodiversity.

Appendix C: Protected sites, PTC-owned sites, Other land sites, 'Blue' sites

⁷ A survey for Planning Application LW/25/0224, a site south of A259, recorded sightings of four types of bats – including barbastelle, soprano pipistrelle and noctule

1. Protected sites

Many of these are shown on the East Sussex LNRS map. Their maintenance is not a PTC legal responsibility, but the TFG on Biodiversity might want to consider appropriate action in support of PTC biodiversity policy.

1.1 Brighton and Lewes Downs UNESCO Biosphere Region: Branded 'The Living Coast' (thelivingcoast.org.uk), this designation involves a cross-sector partnership of 40 organisations led by B&HCC. The aim of UNESCO Biospheres is to demonstrate practical ways of balancing biodiversity conservation with sustainable human development. Each contains core areas of strictly protected zones dedicated to conserving biodiversity; a buffer zone; and a transition area where communities live and work and the main focus is sustainable economic development. Areas of Peacehaven outside the SDNP appear currently to be included within the 'transition' zone (new maps are in preparation).

1.2 Brighton to Newhaven Cliffs SSSI : This includes the beach, undercliff walk, the chalk cliffs plus a thin strip along the top of the cliffs (stretching landwards for variable distances and sometimes as far as the vehicular road, The Promenade). This supports rare plant species in particular. It is much degraded in places and needs restorative action and should be considered for prioritisation in liaison with ESB&HLNRS and LDC. Deliberately or recklessly destroying or damaging the special features of an SSSI is a criminal offence. Those responsible for SSSIs are expected to actively conserve special features (eg through agreed land management plans).

1.3 Local Wildlife Sites: These are marked as Areas of Particular Importance for Biodiversity (APIB), green on the ESB&HLNRS Map. There are currently four in Peacehaven: (a) the circumference of Howard Peace + the area stretching eastwards from Howard Park to Phyllis Avenue; (b) an area that starts at the east end of Peacehaven Promenade and stretches over Peacehaven Heights into Newhaven; (c) an area that covers Links Avenue and stretches southwards across the A259 to take in parts of Rushy Hill; (d) and a site in the north east corner of Valley Road area stretching into Piddinghoe. These areas have considerable protection from housing or other development and areas close by are also, in practice, subject to more biodiversity weighting than elsewhere in planning decisions.

1.4 Areas that Could Become of Importance for Biodiversity (ACIB): These are scattered across Peacehaven less densely than in many other parts of ESCC, and particularly feature buffer zones around the existing LWS. See brown areas on the map. The authors of this Report to E&S believe that, given the growing evidence of biodiversity concentrations in some other areas, the current designations need to be reviewed, particularly in the case of the Valley Road area.

2. PTC-owned sites

In July 2025, experts employed by OVCA visited three PTC parks to assess how best biodiversity could be promoted by Parks Officers, free of charge to PTC as part of the overall OVCA project. There was a delay (with good reason) before PTC received the reports. They appear in Appendix D. Some salient action points are listed below, with OVCA-recommended action varying from area to area within each park. Base-line species surveys are recommended, followed up with repeat surveys in later years. The smaller parks have not been assessed, but are protected from development as green spaces designated in the Neighbourhood Plan.

2.1 The Dell: Some of the recommendations have already been implemented. Others include: cut back gorse, leave one-metre uncut along the fence where not already done, replace some of the shelter hedge with purging buckthorn (and hawthorn), add a hedge along play area boundary, plug plant some specific plant species to encourage specific butterflies, especially migrants blown to the Dell.

2.2 Centenary Park: Check geology for variations in soil type; create and rotate glades in copses; liaise with Southern Water re cutting and baling its land again (if not already done) and creating glades in its copses; specific plug planting to encourage specific butterflies

2.3 The Oval: Make the moles a high interest priority species with community engagement in research; mow alternate halves every six weeks; 3-5 year rotational coppicing of gorse to make sure the age of plants varies; reduce silver birch/holm oak in preference for beech or buckthorn.

2.4 Other PTC-owned sites: This category includes Community House, bus shelters and remaining parks. PTC has already implemented a green roof policy and its policies on the buildings it owns are biodiversity-aware. In time,

the Nature Recovery TFG might want to apply the same assessments to the smaller parks as has already been done for the big ones.

3. Other land sites

Many of the sites that lie between and within housing developments are currently protected from development since they are designated by LDC as Local Green Spaces (this may change). Grass verges, Rushey Hill/Peacehaven Heights and other large areas (such as Valley Road, Ashington Road/Downs Avenue and fields north and east of Tudor Rose) are not protected and have not been subject to detailed research or action.

3.1 Local Green Spaces: The 2026 National Planning Policy Framework has tightened the definition of Local Green Spaces that can be protected from development. PTC has applied to LDC for almost all of the currently protected Local Green Spaces to be retained with that designation as a result of LDC's current Review of Green Spaces. If LDC does not retain these designations then all these areas could be opened up for further housing development, subject to Rights contained in the deeds of owner-occupied homes or immutable clauses in tenancy agreements. Action to protect and promote biodiversity falls to local residents on each estate. The TFG might want to encourage community action to promote Nature Recovery in these green spaces.

3.2 Grass verges: PTC contains more grass verges (between pavements and highways) than most towns. Grass verges also characterise the ESCC-owned potential 'pocket parks' where north-south roads have been cut off from the A259. In 2023-4, Planning Committee (taking account of a Report by Kaner Olette consultancy), examined the possibility of increasing plant biodiversity and creating bee corridors by action to 'rewild' grass verges and the potential 'pocket parks'. At that time, volunteers proved unwilling to take on even small areas – and any action would have had to fall to Parks Officers at the expense of PTC council taxpayers. Any new initiatives in this area would need community volunteers and community organisation. The TFG might want to encourage community action to promote Nature Recovery.

3.3 Other large areas – Rushey Hill/ Peacehaven Heights (outside the LWS), Areas around Tudor Rose, Downs Avenue/ Ashington Road, Valley Road:

3.31 Rushey Hill/Peacehaven Heights: This is outside the settlement boundary, close to LWS and the clifftop and subject to an Article 4 Direction from Government Minister that legally forbids much normally permitted development without Local Authority Planning consent. Many local landowners have put forward their land for inclusion in the LDC site allocation process with a view to developing the whole area for housing⁸. In the LDC draft Local Plan 2042, it was proposed that the area should be protected from development as a buffer zone between Peacehaven and Newhaven, but NPPF 2026 may change these proposals⁹. There are also barriers related to geological and contextual issues, such as views to and from the SDNP and the King Charles III England Coast Path, flooding on the north slopes and cliff erosion and the SSSI to the south.

3.32 Areas around Tudor Rose: These too are outside the settlement boundary. Again, local landowners have put forward land to LDC for site allocation for housing development. At least one planning application for housing development in the past has been refused.

3.33 Downs Avenue/ Ashington: Within the Settlement Boundary. Much of this land is owned by LDC and it contains large grassy areas.

3.34 Valley Road area: Outside the Settlement Boundary, and surrounded on three sides by SDNP, this is the area where concentrated species biodiversity is most threatened by housing development. Significant tracts of land plus rights to charge for new access to roads throughout the area are in single ownership, while plots on the rest of the land belong to multiple other owners. To the east, across the boundary in Piddinghoe, the adjoining land is in the hands of a single owner, who has designated his land for Higher Tier Stewardship (a programme providing grants for environmental and nature recovery). The SxBR records for the Valley Road area (ie one kilometre radius from its centre at the junction of Valley Road and Roderick Avenue North) show 187 records of 37 species of international significance and 1,969 records of 107 species of national significance. This is a dense concentration of species with particularly notable significance. Altogether, the area shows 3,745 records of 250 protected and designated species.

⁸LDC Local Plan 2042 Land Availability Assessment December 2024

⁹See NPPF 2026 paragraph S2 (1) (c)

Anecdotal evidence is even more powerful. One local resident recorded several hundred different butterfly and moth species in his garden over the years. In 2026, residents at each end of the Valley Road reported buzzards and hawks nesting in their gardens – red kites are frequently seen. Many of the birds that can be seen flying over the surrounding SDNP fields and grassland are thought to be nesting in the Valley Road area. A dry chalk valley that can suddenly flood down to the C7, it also contains patches of clay and biodiverse ponds. Aecom has described it as potentially a wildlife corridor: ‘...there is extensive priority habitat in the area, and this likely has strategic importance, as this is a concentration of habitat along a valley that links to the River Ouse corridor to the east....’¹⁰ The evidence for concentration of species biodiversity (as well as habitat) adds weight to this conclusion.

4. The Coast

The southern boundary of Peacehaven consists of a Site of Special Scientific Interest that starts in Brighton and ends in Newhaven. This is subject to erosion and changes daily with the weather, including the effects of waves and tides on the shingle and sea-wrack: sometimes the huge ammonites below the high-tide line are visible, sometimes they are overgrown with sea-weed. The rock-pools contain many inter-tidal species (sea-anemones, limpets, sea-snails, small crabs) and attract bird -life including egrets and oyster-catchers. Seals and dolphins can be seen from time to time. The evidence from the egg cases that wash up on the beach suggest a healthy offshore population of rays and catsharks/`dogfish`. The outflow pipe from the Centenary Park Waste Water treatment plant goes into the sea beyond the east end of Peacehaven beach, the storm overflows pipe from the Telscombe Portobello pumping station beyond the west end. Surfers use the beach access at the west end of the undercliff walk. Since 2023, some PTC councillors have raised the possibility of various actions, such as arranging for volunteers to test the purity of the seawater regularly; but PTC has taken no action so far to protect or improve biodiversity/nature recovery in the beach area. Volunteer litter-pickers are now very active along the beach and clifftop, and a project involving Peacehaven Community School has improved the east end (see ‘From Weald to Waves, above). The TFG might consider restoration of the SSSI as a top priority (even though it is not the responsibility of PTC), working with ESB&HLNRS – once lost, the SSSI biodiversity, which is patchy, may never be recovered.

Appendix D: OVCA Advice on how to promote biodiversity in three PTC Parks: Dell, Centenary and Oval

See separate attachments.



Committee	Environment and Sustainability	Agenda Item:	ES43
Meeting date:	November 3 2026	Authors:	Cllrs Campbell and Wood
Subject:	PTC's Biodiversity and Nature Recovery Policy		
Purpose:	To Agree Next Steps on Biodiversity and Nature Recovery		

Recommendation(s):

Agree recommendations for progressing biodiversity & nature recovery policy.

1. Background

'The biosphere, upon which human life on the planet depends, is being altered to an unparalleled degree across the world'; 'nature is declining globally at rates unprecedented in human history and the rate of species decline is accelerating'; 'the UK is now one of the most nature-depleted countries on earth'; 'across the UK, species studied have declined by an average 19% since 1970 with nearly 1 in 6 of identified species threatened with extinction within GB.'¹

The four national policy aims developed as a result of these governmental conclusions are:

- Improve the quality of protected sites on land and at sea – many are in poor condition
- Create more, bigger and messier places for wildlife
- Reduce pollution on land, notably pesticides and excess fertilisers and reduce the pressure on water environments
- Identify target species for recovery action which is effective when applied to a high proportion of species population and key to bringing back lost species

Since the January 2021 Environment Act, new biodiversity, water and air legislation has developed national targets:

- Restore or create 500,000 hectares of wildlife-rich habitat **outside** protected sites, identifying the most productive locations [our emphasis]
- Halt the decline of species abundance by 2030 and increase the 2030 level by at least 10% by 2042, including by maintaining wildlife connectivity [often referred to as 'corridors']
- Increase total tree and woodland cover, particularly where this benefits biodiversity
- Improve water quality and availability

¹Natural England's 'State of Nature' Report 2023; *Biodiversity Loss*, House of Commons Library Debate Pack, May 2024.

These aims are being implemented via a number of routes.

- **Planning Decisions.** (a) In 2024, biodiversity net gain was made mandatory for most developments, although developments under 0.2 hectares in size have been exempted since August 2026. Planning Applications are encouraged to propose terms to be included in a section 106 agreement.² Although Applications cannot be refused because biodiversity net gain cannot be achieved, Planning Authorities 'may need to consider more broadly whether the biodiversity net gain condition is capable of being successfully discharged'.³ Payments for off-site biodiversity enhancement can mean payments to eg a National Park rather than local net gains. In Lewes District, central government's requirement to identify more land for housing has already intensified the threat to biodiversity.⁴ (b) Because so much of Peacehaven is within the South Downs National Park (SDNP) or on its boundary (and Peacehaven has no railway station), planning rules protecting biodiversity outside the settlement boundary may in effect, be stronger than average here, especially in the areas close to the SDNP boundary. Inspectors have upheld Lewes District Council (LDC) decisions to refuse permission close to the SDNP boundary where wildlife and biodiversity need to be protected by night skies, tranquillity and other rules that apply in the context of National Parks.⁵
- **Specific requirements on Local Councils.** Town Councils now have a statutory duty to develop a biodiversity policy. For Peacehaven's Policy, see Appendix A. The Town Council has already implemented a habitat biodiversity audit of three of its Parks (by Ouse Valley Climate Action OVCA) and, via Planning Committee, fulfils the policy in its responses to Planning Applications. PTC provides for over 80 allotments (mostly small – there is waiting list). It has provided sites and support for local volunteer organisations that run a Community Orchard (in Centenary Park) and a Community Garden (in the Oval park). It has almost eliminated use of damaging pesticides on land it owns. This Report identifies possible further action to progress PTC's nature recovery and biodiversity policy.
- **Development of Local Nature Recovery Strategies.** Mandated by law, these have mapped areas of importance, established and involved via consultation and engagement with local organisations and individuals and including all the land not owned by local authorities. Peacehaven falls within the East Sussex and Brighton and Hove Local Nature Recovery Strategy (ESB&HLNRS) area, with the Policy published in June 2026. Unfortunately, it seems that PTC, which was at the forefront of so many other 'Green' initiatives in East Sussex, did not participate in the development of this Strategy, including consultations, and this is reflected in the text of the ESB&HLNRS. This Report to PTC Environment and Sustainability Committee takes the first step towards achieving the PTC policy 'to review local nature recovery strategies, species conservation strategies, protected sites strategies....and consider in general how it may become more involved in implementing the strategies' recommendations' and try to raise the profile of Peacehaven in both ESB&HLNRS. PTC-owned land, SDNP land and protected sites are not islands: biodiversity changes in the rest of Peacehaven have the power to determine biodiversity changes within PTC-owned land and within the SDNP and protected sites.

Further details on particular topics and issues, including sources of advice and expert local organisations, are set out in Appendix B. Appendix C summarises the habitat and species biodiversity issues specific to Peacehaven under four

²Government Guidance on Biodiversity net gain, Ministry of Housing Communities and Local Government and Dept for Levelling Up Housing and Communities, Feb 2024, as updated July 31 2026 para 105 Ref ID: 74-015-20240214

³Op cit Para 019, ref Id: 74-019-20240214

⁴The Dewdrop site in Steyning Avenue, for example, has been granted planning consent for new flats despite evidence of rare barbastelle and other bats (Planning App LW/25/0224); in Downs Walk, planning consent for development on a site wrongly stated to be 1.5km from the SDNP resulted in the destruction of trees of significant public amenity with TPOs on them, as well as the loss of hedgerows etc.

⁵Planning Inspectors rejecting Appeals against LDC refusal of planning consents cite eg a legal requirement that 'development within the setting of a National Park [ie close by] should be sensitively located and designed to avoid or minimise adverse impacts upon it'. See eg Planning Application APP/P14425/W/24/3346977, Blakeney Avenue. The same provision was also a major factor cited in relation to a site in the Valley Road area of north Peacehaven by an Inspector refusing an Appeal (LW/24/0105).

heads: PTC-owned land; 'Protected' sites (such as Site of Special Scientific Interest- SSSI) in Peacehaven; assessment of non-protected sites in relation to government policy to preserve and restore 500,000 hectares of non-protected land (and increase trees) by 2042; and the coast. Appendix D contains the Advice Recommendations from OVCA for promoting biodiversity (both habitats and species) in three PTC Parks: The Dell, Centenary Park and the Oval.

It will be some months before E&S Committee meets again, with little time for achievement before the next Town Council election in May 2027. So the recommendation in this Report is to approve the following, subject to confirmation by the Nature Recovery or Biodiversity TFGs which reports to Full Council (and could also propose other items).

- Request Personnel Committee to add a voluntary biodiversity/nature recovery module to the training schedule for all PTC Officers and Councillors (see Appendix B, para 1.1)
- Request Planning Committee to assess biodiversity net gain issues (including how biodiversity net gain monies could be attracted into Peacehaven) and specific habitats/ species recovery measures for comment in Planning Applications (see Appendices B and C)
- Request the biodiversity TFG to urgently meet and bring recommendations back to Committee to move forward with the proposals from OVCA on improving biodiversity in PTC Parks (see Appendix A on PTC Policy, Appendix B para 3.3, Appendices C and D)
- Request Community Engagement Committee to contact residents and PCS with a view to building a team of volunteers for biodiversity protection and regeneration projects (See eg Appendix B, para 2.1 and 2.2)
- Request the Nature Recovery TFG to prepare proposals that would maximise the nature recovery benefit of any sites in the Valley Road that PTC might own in future
- Request the Nature Recovery TFG to make recommendations on the relative prioritisation for action of the potential sites summarised in Appendix C, including liaison with relevant external stakeholders.
- Request the Nature Recovery TFG to consider whether to put forward any further areas to the ESB&HLNRS for designation as areas of potential importance for biodiversity (ACIB)

2. Options for Council

To Agree the Recommendation

To Amend the Recommendation

To Reject the Recommendation

3. Reason for recommendation

To comply with National and PTC policy; to raise the profile of Peacehaven within the development of East Sussex and B&H Nature Recovery Strategies and actions; to improve biodiversity and nature recovery in Peacehaven; to support community initiatives promoting nature recovery.

4. Expected benefits

Possible benefits include: saving some species from local extinction (it is probably already too late for many that are officially recorded as existing locally within the last forty years)⁶; improving the condition of protected sites; nature recovery and improvement in PTC-owned sites; prioritisation in relation to habitat and species biodiversity of sites that are not protected; improvements in health and nature-awareness among residents; ripple effects into increased nature-related leisure and employment.

Implications

5.1 Legal	NPPF 2026 and other national legislation, LDC local Plan, NDP, East Sussex and B&HCC Nature Recovery Strategies, SSSI & other protected designations, national targets (especially for sites not formally protected)
5.2 Risks	That habitat and species biodiversity in Peacehaven is lost, with much wider effects, if action is not taken urgently
5.3 Financial	Biodiversity net gain monies, grant and other monies for Nature Recovery
5.4 Time scales	Immediate and continuing
5.5 Stakeholders & Social Value	All pedestrians, habitat and species biodiversity, coastal biodiversity
5.6 Contracts	
5.7 Climate & Sustainability	Essential, and hitherto inadequately cared for in PTC
5.8 Crime & Disorder	
5.9 Health & Safety	Trees and access to nature is now of recognised value for health; safety issues outside settlement boundary
5.10 Biodiversity	Habitat and species biodiversity protection and Nature Recovery are at the core of this Report
5.11 Privacy Impact	
5.12 Equality & Diversity	

5. Values & priorities alignment

Which of the Core Values does the recommendation demonstrate?	
6.1 Empowering and supporting the community	X
6.2 Growing the economy sustainably	X
6.3 Helping children and young people	X
6.4 Improving the quality of life for residents and visitors to Peacehaven	X
6.5 Supporting residents in need	X
6.6 Valuing the environment	X
6.7 Which business plan item(s) does the recommendation relate to?	
Assets of Nature and Biodiversity, Green Infrastructure Plan	

6. Appendices

Appendix A PTC Biodiversity Policy

See separate attachment

APPENDIX B: Topics, Issues and organisations

⁶ Examples of species that have been officially recorded in the area, but without recorded sightings for over a decade: hen harrier, whiskered bat

1. General

1.1 Training: Biodiversity and Nature Recovery, a policy requirement for Town Councils since 2024, have in the past not been the subject of formal training for officers or councillors. Such training needs to include updates resulting from the August 2026 NPPF and other recent changes. Royal Institute of Chartered Surveyors (RICS) provided a one-hour overview UK Statutory Guidance on local nature recovery strategies (not including planning, which should be covered by planning-specific training). A course for Town Councils and others on implementation of biodiversity regeneration is being developed by OVCA as one of its last projects.

1.2 Local Nature Recovery Strategies (LNRS): After years of consultation and preparation East Sussex County Council (ESCC) and Brighton and Hove City Council (B&HCC) published a joint LNRS in June 2026. This focuses mainly on habitat mapping, but also identifies specific species for regenerative action. This will determine priorities within ESCC and B&H.

Habitat Recovery

2.1 From Weald to Waves A network of groups from local councils to farmers, schools and gardeners establishing a 100-mile landowner-led nature recovery corridor from the Weald to the Sussex coast. Recently worked with Peacehaven Community School on projects to clean up the east end of Peacehaven undercliff. Projects include 'the 100-mile classroom: landscape learning for the next generation'. Free practical advice. PTC could consider joining it. [wealdtowaves.co.uk]

2.2 Greenhavens Network A registered East Sussex charity that connects over 100 community groups, conservation projects and local volunteers. Training sessions on rewilding initiatives (greenhavens.network, wildergardens@greenhavens.network)

2.3 Ouse Valley Climate Action A National Lottery funded programme 2022-2026 that brought together and sponsored projects including several in Peacehaven.

2.4 Changing Chalk Now also ending, this was a four-year landscape-scale partnership programme 2022-2026 led by the National Trust. Delivering 21 interconnected projects across the eastern South Downs, and a Community Grants Scheme, it restored chalk grassland and much else.

3. Species biodiversity and nature recovery

Habitat mapping can be done effectively from the air and helps to define whether a species *could* exist at a particular site. Whether a species *does* exist at any site is much more difficult and expensive to research and record. Mapping **species** biodiversity is very difficult since records depend on the extent to which volunteers and others send sightings and evidence to the Sussex Biodiversity Records Centre (SxBRC) and on the timing of ecological surveys: an ecological survey of invertebrates in December is unlikely to give a full picture of the butterfly population! This Appendix summarises current issues (including legal protections, if any) in connection with some species and lists some go-to organisations. Sources for what follows include eg the RSPCA, RSPB.

3.1 Badgers: The Protection of Badgers Act 1992 aims to stop cruelty to badgers and badger setts. If a potential site for a road or housing contains an occupied badger sett, planning permission may still be given as long as the correct measures are taken to protect the sett. The sites of badger setts are not listed by SxBRC. Badger setts are widespread in Peacehaven. Without knowing where they are, it is difficult for Planning Officers in PTC or LDC to protect them, making it difficult to implement the law. The Badger Trust Reporting Centre (Badgertrust.org.uk or secretary@badgertrust-sussex.org.uk) keeps a record of sett locations it is informed about. Locally, see also South Downs Badger Protection Group for emergency numbers. Badgers sets are known to exist in many parts of Peacehaven, even south of A259, and notably in the Valley Road area.

3.2 Bats: All bats are legally protected by national and EU laws. Roosts are protected year-round. Planning Applications can need an ecological survey. For details, see Bat Conservation Trust (Bats.org.uk). Several varieties of bats have been recorded right across Peacehaven. ⁷See also Sussex Bat group (contact@sussexbatgroup.org.uk). Anecdotal evidence suggests that bat numbers have been declining due to housing development but are still widespread. Data from SBRC record at least ten species, almost all of them with sightings recorded within the last ten years.

3.3 Bees: Bees have no legal protection in UK, although some bee species appear on England's section 41 priority list (which guides conservation but does not grant legal immunity). SxBRC records sightings of around 20 different bee species locally in the last 40 years with about a quarter having no sightings reported since 2020. Policies requiring the inclusion of bee bricks in Planning Consents have been promoted, especially for urban areas: but questioned on the grounds of evidence that they are often used by other insects, can be the wrong size and may need cleaning to prevent them encouraging disease. Less controversial are programmes to support pollinators by increasing diversity of plant species across the landscape. SDNP Trust 'Beelines' initiative is working with landowners across the South Downs but restricts its funding to initiatives within the South Downs. Now that OVCA has ceased to exist as a source of funding, other potential funding sources may need to be organised in Lewes District.

3.4 Birds: Stretching from the heights of the South Downs to the sea coast, Peacehaven contains a broad range of bird species. With its intermixed habitats of grass, scrub and woodland, inland species are especially concentrated in the Valley Road area where residents have recorded nesting sparrowhawks, buzzards, kestrels and owls. Many other birds ranging from woodpeckers to greenfinches are common (see SxBRC). At the coast, the bird population is different, with varieties of gulls, rock pipits and occasional egrets, herons and oyster-catchers. Swifts, that come back to the same nest year after year, have declined sharply and are now red-listed. B&HCC requires integration of swift bricks or boxes on new developments that are 5 metres or higher: the TFG could consider whether PTC should adopt the same policy in its responses to planning consultations and in its own building programme. [Sussex Ornithological Society, info@seafordswifts.org.uk]

3.5 Butterflies and moths: At the coast, many of the butterflies and moths seen in Peacehaven are migrants from across the Channel. In the Valley Road area, a resident amateur lepidopterist has kept private records for many years that show high levels of species (several hundred different moths and butterfly species recorded as having been seen), indicating the potential wealth of Peacehaven habitat. The action plans for increasing plant biodiversity in the PTC Parks for the benefit of butterflies and moths are set out in Appendix D.

3.5 Other land species: Great crested newts are now thought to be extinct in Peacehaven. However, reptiles and amphibians are widespread. As are badgers and bats. A two hour survey of one field in the Valley Road area of Peacehaven in 2023 yielded SxBRC records of several protected and designated species of invertebrate: but species recording of invertebrates has been sadly lacking.

3.6 Beach and sea species: [see section on the coast below]

3.7 Invasive species the SxBRC records show 208 records of 28 invasive non-native species within a two kilometre radius of Peacehaven Heights. SxBRC records show 73 records of 18 invasive non-native species within a 1 kilometre radius of the centre of the Valley Road area. The TFG might want to consider whether any of them are significantly damaging native biodiversity.

Appendix C: Protected sites, PTC-owned sites, Other land sites, 'Blue' sites

⁷ A survey for Planning Application LW/25/0224, a site south of A259, recorded sightings of four types of bats – including barbastelle, soprano pipistrelle and noctule

1. Protected sites

Many of these are shown on the East Sussex LNRS map. Their maintenance is not a PTC legal responsibility, but the TFG on Biodiversity might want to consider appropriate action in support of PTC biodiversity policy.

1.1 Brighton and Lewes Downs UNESCO Biosphere Region: Branded 'The Living Coast' (thelivingcoast.org.uk), this designation involves a cross-sector partnership of 40 organisations led by B&HCC. The aim of UNESCO Biospheres is to demonstrate practical ways of balancing biodiversity conservation with sustainable human development. Each contains core areas of strictly protected zones dedicated to conserving biodiversity; a buffer zone; and a transition area where communities live and work and the main focus is sustainable economic development. Areas of Peacehaven outside the SDNP appear currently to be included within the 'transition' zone (new maps are in preparation).

1.2 Brighton to Newhaven Cliffs SSSI : This includes the beach, undercliff walk, the chalk cliffs plus a thin strip along the top of the cliffs (stretching landwards for variable distances and sometimes as far as the vehicular road, The Promenade). This supports rare plant species in particular. It is much degraded in places and needs restorative action and should be considered for prioritisation in liaison with ESB&HLNRS and LDC. Deliberately or recklessly destroying or damaging the special features of an SSSI is a criminal offence. Those responsible for SSSIs are expected to actively conserve special features (eg through agreed land management plans).

1.3 Local Wildlife Sites: These are marked as Areas of Particular Importance for Biodiversity (APIB), green on the ESB&HLNRS Map. There are currently four in Peacehaven: (a) the circumference of Howard Peace + the area stretching eastwards from Howard Park to Phyllis Avenue; (b) an area that starts at the east end of Peacehaven Promenade and stretches over Peacehaven Heights into Newhaven; (c) an area that covers Links Avenue and stretches southwards across the A259 to take in parts of Rushy Hill; (d) and a site in the north east corner of Valley Road area stretching into Piddinghoe. These areas have considerable protection from housing or other development and areas close by are also, in practice, subject to more biodiversity weighting than elsewhere in planning decisions.

1.4 Areas that Could Become of Importance for Biodiversity (ACIB): These are scattered across Peacehaven less densely than in many other parts of ESCC, and particularly feature buffer zones around the existing LWS. See brown areas on the map. The authors of this Report to E&S believe that, given the growing evidence of biodiversity concentrations in some other areas, the current designations need to be reviewed, particularly in the case of the Valley Road area.

2. PTC-owned sites

In July 2025, experts employed by OVCA visited three PTC parks to assess how best biodiversity could be promoted by Parks Officers, free of charge to PTC as part of the overall OVCA project. There was a delay (with good reason) before PTC received the reports. They appear in Appendix D. Some salient action points are listed below, with OVCA-recommended action varying from area to area within each park. Base-line species surveys are recommended, followed up with repeat surveys in later years. The smaller parks have not been assessed, but are protected from development as green spaces designated in the Neighbourhood Plan.

2.1 The Dell: Some of the recommendations have already been implemented. Others include: cut back gorse, leave one-metre uncut along the fence where not already done, replace some of the shelter hedge with purging buckthorn (and hawthorn), add a hedge along play area boundary, plug plant some specific plant species to encourage specific butterflies, especially migrants blown to the Dell.

2.2 Centenary Park: Check geology for variations in soil type; create and rotate glades in copses; liaise with Southern Water re cutting and baling its land again (if not already done) and creating glades in its copses; specific plug planting to encourage specific butterflies

2.3 The Oval: Make the moles a high interest priority species with community engagement in research; mow alternate halves every six weeks; 3-5 year rotational coppicing of gorse to make sure the age of plants varies; reduce silver birch/holm oak in preference for beech or buckthorn.

2.4 Other PTC-owned sites: This category includes Community House, bus shelters and remaining parks. PTC has already implemented a green roof policy and its policies on the buildings it owns are biodiversity-aware. In time,

the Nature Recovery TFG might want to apply the same assessments to the smaller parks as has already been done for the big ones.

3. Other land sites

Many of the sites that lie between and within housing developments are currently protected from development since they are designated by LDC as Local Green Spaces (this may change). Grass verges, Rushey Hill/Peacehaven Heights and other large areas (such as Valley Road, Ashington Road/Downs Avenue and fields north and east of Tudor Rose) are not protected and have not been subject to detailed research or action.

3.1 Local Green Spaces: The 2026 National Planning Policy Framework has tightened the definition of Local Green Spaces that can be protected from development. PTC has applied to LDC for almost all of the currently protected Local Green Spaces to be retained with that designation as a result of LDC's current Review of Green Spaces. If LDC does not retain these designations then all these areas could be opened up for further housing development, subject to Rights contained in the deeds of owner-occupied homes or immutable clauses in tenancy agreements. Action to protect and promote biodiversity falls to local residents on each estate. The TFG might want to encourage community action to promote Nature Recovery in these green spaces.

3.2 Grass verges: PTC contains more grass verges (between pavements and highways) than most towns. Grass verges also characterise the ESCC-owned potential 'pocket parks' where north-south roads have been cut off from the A259. In 2023-4, Planning Committee (taking account of a Report by Kaner Olette consultancy), examined the possibility of increasing plant biodiversity and creating bee corridors by action to 'rewild' grass verges and the potential 'pocket parks'. At that time, volunteers proved unwilling to take on even small areas – and any action would have had to fall to Parks Officers at the expense of PTC council taxpayers. Any new initiatives in this area would need community volunteers and community organisation. The TFG might want to encourage community action to promote Nature Recovery.

3.3 Other large areas – Rushey Hill/ Peacehaven Heights (outside the LWS), Areas around Tudor Rose, Downs Avenue/ Ashington Road, Valley Road:

3.31 Rushey Hill/Peacehaven Heights: This is outside the settlement boundary, close to LWS and the clifftop and subject to an Article 4 Direction from Government Minister that legally forbids much normally permitted development without Local Authority Planning consent. Many local landowners have put forward their land for inclusion in the LDC site allocation process with a view to developing the whole area for housing⁸. In the LDC draft Local Plan 2042, it was proposed that the area should be protected from development as a buffer zone between Peacehaven and Newhaven, but NPPF 2026 may change these proposals⁹. There are also barriers related to geological and contextual issues, such as views to and from the SDNP and the King Charles III England Coast Path, flooding on the north slopes and cliff erosion and the SSSI to the south.

3.32 Areas around Tudor Rose: These too are outside the settlement boundary. Again, local landowners have put forward land to LDC for site allocation for housing development. At least one planning application for housing development in the past has been refused.

3.33 Downs Avenue/ Ashington: Within the Settlement Boundary. Much of this land is owned by LDC and it contains large grassy areas.

3.34 Valley Road area: Outside the Settlement Boundary, and surrounded on three sides by SDNP, this is the area where concentrated species biodiversity is most threatened by housing development. Significant tracts of land plus rights to charge for new access to roads throughout the area are in single ownership, while plots on the rest of the land belong to multiple other owners. To the east, across the boundary in Piddinghoe, the adjoining land is in the hands of a single owner, who has designated his land for Higher Tier Stewardship (a programme providing grants for environmental and nature recovery). The SxBR records for the Valley Road area (ie one kilometre radius from its centre at the junction of Valley Road and Roderick Avenue North) show 187 records of 37 species of international significance and 1,969 records of 107 species of national significance. This is a dense concentration of species with particularly notable significance. Altogether, the area shows 3,745 records of 250 protected and designated species.

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See separate attachments.



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'The biosphere, upon which human life on the planet depends, is being altered to an unparalleled degree across the world'; 'nature is declining globally at rates unprecedented in human history and the rate of species decline is accelerating'; 'the UK is now one of the most nature-depleted countries on earth'; 'across the UK, species studied have declined by an average 19% since 1970 with nearly 1 in 6 of identified species threatened with extinction within GB.'¹

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- Improve the quality of protected sites on land and at sea – many are in poor condition
- Create more, bigger and messier places for wildlife
- Reduce pollution on land, notably pesticides and excess fertilisers and reduce the pressure on water environments
- Identify target species for recovery action which is effective when applied to a high proportion of species population and key to bringing back lost species

Since the January 2021 Environment Act, new biodiversity, water and air legislation has developed national targets:

- Restore or create 500,000 hectares of wildlife-rich habitat **outside** protected sites, identifying the most productive locations [our emphasis]
- Halt the decline of species abundance by 2030 and increase the 2030 level by at least 10% by 2042, including by maintaining wildlife connectivity [often referred to as 'corridors']
- Increase total tree and woodland cover, particularly where this benefits biodiversity
- Improve water quality and availability

¹Natural England's 'State of Nature' Report 2023; *Biodiversity Loss*, House of Commons Library Debate Pack, May 2024.

These aims are being implemented via a number of routes.

- **Planning Decisions.** (a) In 2024, biodiversity net gain was made mandatory for most developments, although developments under 0.2 hectares in size have been exempted since August 2026. Planning Applications are encouraged to propose terms to be included in a section 106 agreement.² Although Applications cannot be refused because biodiversity net gain cannot be achieved, Planning Authorities 'may need to consider more broadly whether the biodiversity net gain condition is capable of being successfully discharged'.³ Payments for off-site biodiversity enhancement can mean payments to eg a National Park rather than local net gains. In Lewes District, central government's requirement to identify more land for housing has already intensified the threat to biodiversity.⁴ (b) Because so much of Peacehaven is within the South Downs National Park (SDNP) or on its boundary (and Peacehaven has no railway station), planning rules protecting biodiversity outside the settlement boundary may in effect, be stronger than average here, especially in the areas close to the SDNP boundary. Inspectors have upheld Lewes District Council (LDC) decisions to refuse permission close to the SDNP boundary where wildlife and biodiversity need to be protected by night skies, tranquillity and other rules that apply in the context of National Parks.⁵
- **Specific requirements on Local Councils.** Town Councils now have a statutory duty to develop a biodiversity policy. For Peacehaven's Policy, see Appendix A. The Town Council has already implemented a habitat biodiversity audit of three of its Parks (by Ouse Valley Climate Action OVCA) and, via Planning Committee, fulfils the policy in its responses to Planning Applications. PTC provides for over 80 allotments (mostly small – there is waiting list). It has provided sites and support for local volunteer organisations that run a Community Orchard (in Centenary Park) and a Community Garden (in the Oval park). It has almost eliminated use of damaging pesticides on land it owns. This Report identifies possible further action to progress PTC's nature recovery and biodiversity policy.
- **Development of Local Nature Recovery Strategies.** Mandated by law, these have mapped areas of importance, established and involved via consultation and engagement with local organisations and individuals and including all the land not owned by local authorities. Peacehaven falls within the East Sussex and Brighton and Hove Local Nature Recovery Strategy (ESB&HLNRS) area, with the Policy published in June 2026. Unfortunately, it seems that PTC, which was at the forefront of so many other 'Green' initiatives in East Sussex, did not participate in the development of this Strategy, including consultations, and this is reflected in the text of the ESB&HLNRS. This Report to PTC Environment and Sustainability Committee takes the first step towards achieving the PTC policy 'to review local nature recovery strategies, species conservation strategies, protected sites strategies....and consider in general how it may become more involved in implementing the strategies' recommendations' and try to raise the profile of Peacehaven in both ESB&HLNRS. PTC-owned land, SDNP land and protected sites are not islands: biodiversity changes in the rest of Peacehaven have the power to determine biodiversity changes within PTC-owned land and within the SDNP and protected sites.

Further details on particular topics and issues, including sources of advice and expert local organisations, are set out in Appendix B. Appendix C summarises the habitat and species biodiversity issues specific to Peacehaven under four

²Government Guidance on Biodiversity net gain, Ministry of Housing Communities and Local Government and Dept for Levelling Up Housing and Communities, Feb 2024, as updated July 31 2026 para 105 Ref ID: 74-015-20240214

³Op cit Para 019, ref Id: 74-019-20240214

⁴The Dewdrop site in Steyning Avenue, for example, has been granted planning consent for new flats despite evidence of rare barbastelle and other bats (Planning App LW/25/0224); in Downs Walk, planning consent for development on a site wrongly stated to be 1.5km from the SDNP resulted in the destruction of trees of significant public amenity with TPOs on them, as well as the loss of hedgerows etc.

⁵Planning Inspectors rejecting Appeals against LDC refusal of planning consents cite eg a legal requirement that 'development within the setting of a National Park [ie close by] should be sensitively located and designed to avoid or minimise adverse impacts upon it'. See eg Planning Application APP/P14425/W/24/3346977, Blakeney Avenue. The same provision was also a major factor cited in relation to a site in the Valley Road area of north Peacehaven by an Inspector refusing an Appeal (LW/24/0105).

heads: PTC-owned land; 'Protected' sites (such as Site of Special Scientific Interest- SSSI) in Peacehaven; assessment of non-protected sites in relation to government policy to preserve and restore 500,000 hectares of non-protected land (and increase trees) by 2042; and the coast. Appendix D contains the Advice Recommendations from OVCA for promoting biodiversity (both habitats and species) in three PTC Parks: The Dell, Centenary Park and the Oval.

It will be some months before E&S Committee meets again, with little time for achievement before the next Town Council election in May 2027. So the recommendation in this Report is to approve the following, subject to confirmation by the Nature Recovery or Biodiversity TFGs which reports to Full Council (and could also propose other items).

- Request Personnel Committee to add a voluntary biodiversity/nature recovery module to the training schedule for all PTC Officers and Councillors (see Appendix B, para 1.1)
- Request Planning Committee to assess biodiversity net gain issues (including how biodiversity net gain monies could be attracted into Peacehaven) and specific habitats/ species recovery measures for comment in Planning Applications (see Appendices B and C)
- Request the biodiversity TFG to urgently meet and bring recommendations back to Committee to move forward with the proposals from OVCA on improving biodiversity in PTC Parks (see Appendix A on PTC Policy, Appendix B para 3.3, Appendices C and D)
- Request Community Engagement Committee to contact residents and PCS with a view to building a team of volunteers for biodiversity protection and regeneration projects (See eg Appendix B, para 2.1 and 2.2)
- Request the Nature Recovery TFG to prepare proposals that would maximise the nature recovery benefit of any sites in the Valley Road that PTC might own in future
- Request the Nature Recovery TFG to make recommendations on the relative prioritisation for action of the potential sites summarised in Appendix C, including liaison with relevant external stakeholders.
- Request the Nature Recovery TFG to consider whether to put forward any further areas to the ESB&HLNRS for designation as areas of potential importance for biodiversity (ACIB)

2. Options for Council

To Agree the Recommendation

To Amend the Recommendation

To Reject the Recommendation

3. Reason for recommendation

To comply with National and PTC policy; to raise the profile of Peacehaven within the development of East Sussex and B&H Nature Recovery Strategies and actions; to improve biodiversity and nature recovery in Peacehaven; to support community initiatives promoting nature recovery.

4. Expected benefits

Possible benefits include: saving some species from local extinction (it is probably already too late for many that are officially recorded as existing locally within the last forty years)⁶; improving the condition of protected sites; nature recovery and improvement in PTC-owned sites; prioritisation in relation to habitat and species biodiversity of sites that are not protected; improvements in health and nature-awareness among residents; ripple effects into increased nature-related leisure and employment.

Implications

5.1 Legal	NPPF 2026 and other national legislation, LDC local Plan, NDP, East Sussex and B&HCC Nature Recovery Strategies, SSSI & other protected designations, national targets (especially for sites not formally protected)
5.2 Risks	That habitat and species biodiversity in Peacehaven is lost, with much wider effects, if action is not taken urgently
5.3 Financial	Biodiversity net gain monies, grant and other monies for Nature Recovery
5.4 Time scales	Immediate and continuing
5.5 Stakeholders & Social Value	All pedestrians, habitat and species biodiversity, coastal biodiversity
5.6 Contracts	
5.7 Climate & Sustainability	Essential, and hitherto inadequately cared for in PTC
5.8 Crime & Disorder	
5.9 Health & Safety	Trees and access to nature is now of recognised value for health; safety issues outside settlement boundary
5.10 Biodiversity	Habitat and species biodiversity protection and Nature Recovery are at the core of this Report
5.11 Privacy Impact	
5.12 Equality & Diversity	

5. Values & priorities alignment

Which of the Core Values does the recommendation demonstrate?	
6.1 Empowering and supporting the community	X
6.2 Growing the economy sustainably	X
6.3 Helping children and young people	X
6.4 Improving the quality of life for residents and visitors to Peacehaven	X
6.5 Supporting residents in need	X
6.6 Valuing the environment	X
6.7 Which business plan item(s) does the recommendation relate to?	
Assets of Nature and Biodiversity, Green Infrastructure Plan	

6. Appendices

Appendix A PTC Biodiversity Policy

See separate attachment

APPENDIX B: Topics, Issues and organisations

⁶ Examples of species that have been officially recorded in the area, but without recorded sightings for over a decade: hen harrier, whiskered bat

1. General

1.1 Training: Biodiversity and Nature Recovery, a policy requirement for Town Councils since 2024, have in the past not been the subject of formal training for officers or councillors. Such training needs to include updates resulting from the August 2026 NPPF and other recent changes. Royal Institute of Chartered Surveyors (RICS) provided a one-hour overview UK Statutory Guidance on local nature recovery strategies (not including planning, which should be covered by planning-specific training). A course for Town Councils and others on implementation of biodiversity regeneration is being developed by OVCA as one of its last projects.

1.2 Local Nature Recovery Strategies (LNRS): After years of consultation and preparation East Sussex County Council (ESCC) and Brighton and Hove City Council (B&HCC) published a joint LNRS in June 2026. This focuses mainly on habitat mapping, but also identifies specific species for regenerative action. This will determine priorities within ESCC and B&H.

Habitat Recovery

2.1 From Weald to Waves A network of groups from local councils to farmers, schools and gardeners establishing a 100-mile landowner-led nature recovery corridor from the Weald to the Sussex coast. Recently worked with Peacehaven Community School on projects to clean up the east end of Peacehaven undercliff. Projects include 'the 100-mile classroom: landscape learning for the next generation'. Free practical advice. PTC could consider joining it. [wealdtowaves.co.uk]

2.2 Greenhavens Network A registered East Sussex charity that connects over 100 community groups, conservation projects and local volunteers. Training sessions on rewilding initiatives (greenhavens.network, wildergardens@greenhavens.network)

2.3 Ouse Valley Climate Action A National Lottery funded programme 2022-2026 that brought together and sponsored projects including several in Peacehaven.

2.4 Changing Chalk Now also ending, this was a four-year landscape-scale partnership programme 2022-2026 led by the National Trust. Delivering 21 interconnected projects across the eastern South Downs, and a Community Grants Scheme, it restored chalk grassland and much else.

3. Species biodiversity and nature recovery

Habitat mapping can be done effectively from the air and helps to define whether a species *could* exist at a particular site. Whether a species *does* exist at any site is much more difficult and expensive to research and record. Mapping **species** biodiversity is very difficult since records depend on the extent to which volunteers and others send sightings and evidence to the Sussex Biodiversity Records Centre (SxBRC) and on the timing of ecological surveys: an ecological survey of invertebrates in December is unlikely to give a full picture of the butterfly population! This Appendix summarises current issues (including legal protections, if any) in connection with some species and lists some go-to organisations. Sources for what follows include eg the RSPCA, RSPB.

3.1 Badgers: The Protection of Badgers Act 1992 aims to stop cruelty to badgers and badger setts. If a potential site for a road or housing contains an occupied badger sett, planning permission may still be given as long as the correct measures are taken to protect the sett. The sites of badger setts are not listed by SxBRC. Badger setts are widespread in Peacehaven. Without knowing where they are, it is difficult for Planning Officers in PTC or LDC to protect them, making it difficult to implement the law. The Badger Trust Reporting Centre (Badgertrust.org.uk or secretary@badgertrust-sussex.org.uk) keeps a record of sett locations it is informed about. Locally, see also South Downs Badger Protection Group for emergency numbers. Badgers sets are known to exist in many parts of Peacehaven, even south of A259, and notably in the Valley Road area.

3.2 Bats: All bats are legally protected by national and EU laws. Roosts are protected year-round. Planning Applications can need an ecological survey. For details, see Bat Conservation Trust (Bats.org.uk). Several varieties of bats have been recorded right across Peacehaven. ⁷See also Sussex Bat group (contact@sussexbatgroup.org.uk). Anecdotal evidence suggests that bat numbers have been declining due to housing development but are still widespread. Data from SBRC record at least ten species, almost all of them with sightings recorded within the last ten years.

3.3 Bees: Bees have no legal protection in UK, although some bee species appear on England's section 41 priority list (which guides conservation but does not grant legal immunity). SxBRC records sightings of around 20 different bee species locally in the last 40 years with about a quarter having no sightings reported since 2020. Policies requiring the inclusion of bee bricks in Planning Consents have been promoted, especially for urban areas: but questioned on the grounds of evidence that they are often used by other insects, can be the wrong size and may need cleaning to prevent them encouraging disease. Less controversial are programmes to support pollinators by increasing diversity of plant species across the landscape. SDNP Trust 'Beelines' initiative is working with landowners across the South Downs but restricts its funding to initiatives within the South Downs. Now that OVCA has ceased to exist as a source of funding, other potential funding sources may need to be organised in Lewes District.

3.4 Birds: Stretching from the heights of the South Downs to the sea coast, Peacehaven contains a broad range of bird species. With its intermixed habitats of grass, scrub and woodland, inland species are especially concentrated in the Valley Road area where residents have recorded nesting sparrowhawks, buzzards, kestrels and owls. Many other birds ranging from woodpeckers to greenfinches are common (see SxBRC). At the coast, the bird population is different, with varieties of gulls, rock pipits and occasional egrets, herons and oyster-catchers. Swifts, that come back to the same nest year after year, have declined sharply and are now red-listed. B&HCC requires integration of swift bricks or boxes on new developments that are 5 metres or higher: the TFG could consider whether PTC should adopt the same policy in its responses to planning consultations and in its own building programme. [Sussex Ornithological Society, info@seafordswifts.org.uk]

3.5 Butterflies and moths: At the coast, many of the butterflies and moths seen in Peacehaven are migrants from across the Channel. In the Valley Road area, a resident amateur lepidopterist has kept private records for many years that show high levels of species (several hundred different moths and butterfly species recorded as having been seen), indicating the potential wealth of Peacehaven habitat. The action plans for increasing plant biodiversity in the PTC Parks for the benefit of butterflies and moths are set out in Appendix D.

3.5 Other land species: Great crested newts are now thought to be extinct in Peacehaven. However, reptiles and amphibians are widespread. As are badgers and bats. A two hour survey of one field in the Valley Road area of Peacehaven in 2023 yielded SxBRC records of several protected and designated species of invertebrate: but species recording of invertebrates has been sadly lacking.

3.6 Beach and sea species: [see section on the coast below]

3.7 Invasive species the SxBRC records show 208 records of 28 invasive non-native species within a two kilometre radius of Peacehaven Heights. SxBRC records show 73 records of 18 invasive non-native species within a 1 kilometre radius of the centre of the Valley Road area. The TFG might want to consider whether any of them are significantly damaging native biodiversity.

Appendix C: Protected sites, PTC-owned sites, Other land sites, 'Blue' sites

⁷ A survey for Planning Application LW/25/0224, a site south of A259, recorded sightings of four types of bats – including barbastelle, soprano pipistrelle and noctule

1. Protected sites

Many of these are shown on the East Sussex LNRS map. Their maintenance is not a PTC legal responsibility, but the TFG on Biodiversity might want to consider appropriate action in support of PTC biodiversity policy.

1.1 Brighton and Lewes Downs UNESCO Biosphere Region: Branded 'The Living Coast' (thelivingcoast.org.uk), this designation involves a cross-sector partnership of 40 organisations led by B&HCC. The aim of UNESCO Biospheres is to demonstrate practical ways of balancing biodiversity conservation with sustainable human development. Each contains core areas of strictly protected zones dedicated to conserving biodiversity; a buffer zone; and a transition area where communities live and work and the main focus is sustainable economic development. Areas of Peacehaven outside the SDNP appear currently to be included within the 'transition' zone (new maps are in preparation).

1.2 Brighton to Newhaven Cliffs SSSI : This includes the beach, undercliff walk, the chalk cliffs plus a thin strip along the top of the cliffs (stretching landwards for variable distances and sometimes as far as the vehicular road, The Promenade). This supports rare plant species in particular. It is much degraded in places and needs restorative action and should be considered for prioritisation in liaison with ESB&HLNRS and LDC. Deliberately or recklessly destroying or damaging the special features of an SSSI is a criminal offence. Those responsible for SSSIs are expected to actively conserve special features (eg through agreed land management plans).

1.3 Local Wildlife Sites: These are marked as Areas of Particular Importance for Biodiversity (APIB), green on the ESB&HLNRS Map. There are currently four in Peacehaven: (a) the circumference of Howard Peace + the area stretching eastwards from Howard Park to Phyllis Avenue; (b) an area that starts at the east end of Peacehaven Promenade and stretches over Peacehaven Heights into Newhaven; (c) an area that covers Links Avenue and stretches southwards across the A259 to take in parts of Rushy Hill; (d) and a site in the north east corner of Valley Road area stretching into Piddinghoe. These areas have considerable protection from housing or other development and areas close by are also, in practice, subject to more biodiversity weighting than elsewhere in planning decisions.

1.4 Areas that Could Become of Importance for Biodiversity (ACIB): These are scattered across Peacehaven less densely than in many other parts of ESCC, and particularly feature buffer zones around the existing LWS. See brown areas on the map. The authors of this Report to E&S believe that, given the growing evidence of biodiversity concentrations in some other areas, the current designations need to be reviewed, particularly in the case of the Valley Road area.

2. PTC-owned sites

In July 2025, experts employed by OVCA visited three PTC parks to assess how best biodiversity could be promoted by Parks Officers, free of charge to PTC as part of the overall OVCA project. There was a delay (with good reason) before PTC received the reports. They appear in Appendix D. Some salient action points are listed below, with OVCA-recommended action varying from area to area within each park. Base-line species surveys are recommended, followed up with repeat surveys in later years. The smaller parks have not been assessed, but are protected from development as green spaces designated in the Neighbourhood Plan.

2.1 The Dell: Some of the recommendations have already been implemented. Others include: cut back gorse, leave one-metre uncut along the fence where not already done, replace some of the shelter hedge with purging buckthorn (and hawthorn), add a hedge along play area boundary, plug plant some specific plant species to encourage specific butterflies, especially migrants blown to the Dell.

2.2 Centenary Park: Check geology for variations in soil type; create and rotate glades in copses; liaise with Southern Water re cutting and baling its land again (if not already done) and creating glades in its copses; specific plug planting to encourage specific butterflies

2.3 The Oval: Make the moles a high interest priority species with community engagement in research; mow alternate halves every six weeks; 3-5 year rotational coppicing of gorse to make sure the age of plants varies; reduce silver birch/holm oak in preference for beech or buckthorn.

2.4 Other PTC-owned sites: This category includes Community House, bus shelters and remaining parks. PTC has already implemented a green roof policy and its policies on the buildings it owns are biodiversity-aware. In time,

the Nature Recovery TFG might want to apply the same assessments to the smaller parks as has already been done for the big ones.

3. Other land sites

Many of the sites that lie between and within housing developments are currently protected from development since they are designated by LDC as Local Green Spaces (this may change). Grass verges, Rushey Hill/Peacehaven Heights and other large areas (such as Valley Road, Ashington Road/Downs Avenue and fields north and east of Tudor Rose) are not protected and have not been subject to detailed research or action.

3.1 Local Green Spaces: The 2026 National Planning Policy Framework has tightened the definition of Local Green Spaces that can be protected from development. PTC has applied to LDC for almost all of the currently protected Local Green Spaces to be retained with that designation as a result of LDC's current Review of Green Spaces. If LDC does not retain these designations then all these areas could be opened up for further housing development, subject to Rights contained in the deeds of owner-occupied homes or immutable clauses in tenancy agreements. Action to protect and promote biodiversity falls to local residents on each estate. The TFG might want to encourage community action to promote Nature Recovery in these green spaces.

3.2 Grass verges: PTC contains more grass verges (between pavements and highways) than most towns. Grass verges also characterise the ESCC-owned potential 'pocket parks' where north-south roads have been cut off from the A259. In 2023-4, Planning Committee (taking account of a Report by Kaner Olette consultancy), examined the possibility of increasing plant biodiversity and creating bee corridors by action to 'rewild' grass verges and the potential 'pocket parks'. At that time, volunteers proved unwilling to take on even small areas – and any action would have had to fall to Parks Officers at the expense of PTC council taxpayers. Any new initiatives in this area would need community volunteers and community organisation. The TFG might want to encourage community action to promote Nature Recovery.

3.3 Other large areas – Rushey Hill/ Peacehaven Heights (outside the LWS), Areas around Tudor Rose, Downs Avenue/ Ashington Road, Valley Road:

3.31 Rushey Hill/Peacehaven Heights: This is outside the settlement boundary, close to LWS and the clifftop and subject to an Article 4 Direction from Government Minister that legally forbids much normally permitted development without Local Authority Planning consent. Many local landowners have put forward their land for inclusion in the LDC site allocation process with a view to developing the whole area for housing⁸. In the LDC draft Local Plan 2042, it was proposed that the area should be protected from development as a buffer zone between Peacehaven and Newhaven, but NPPF 2026 may change these proposals⁹. There are also barriers related to geological and contextual issues, such as views to and from the SDNP and the King Charles III England Coast Path, flooding on the north slopes and cliff erosion and the SSSI to the south.

3.32 Areas around Tudor Rose: These too are outside the settlement boundary. Again, local landowners have put forward land to LDC for site allocation for housing development. At least one planning application for housing development in the past has been refused.

3.33 Downs Avenue/ Ashington: Within the Settlement Boundary. Much of this land is owned by LDC and it contains large grassy areas.

3.34 Valley Road area: Outside the Settlement Boundary, and surrounded on three sides by SDNP, this is the area where concentrated species biodiversity is most threatened by housing development. Significant tracts of land plus rights to charge for new access to roads throughout the area are in single ownership, while plots on the rest of the land belong to multiple other owners. To the east, across the boundary in Piddinghoe, the adjoining land is in the hands of a single owner, who has designated his land for Higher Tier Stewardship (a programme providing grants for environmental and nature recovery). The SxBR records for the Valley Road area (ie one kilometre radius from its centre at the junction of Valley Road and Roderick Avenue North) show 187 records of 37 species of international significance and 1,969 records of 107 species of national significance. This is a dense concentration of species with particularly notable significance. Altogether, the area shows 3,745 records of 250 protected and designated species.

⁸LDC Local Plan 2042 Land Availability Assessment December 2024

⁹See NPPF 2026 paragraph S2 (1) (c)

Anecdotal evidence is even more powerful. One local resident recorded several hundred different butterfly and moth species in his garden over the years. In 2026, residents at each end of the Valley Road reported buzzards and hawks nesting in their gardens – red kites are frequently seen. Many of the birds that can be seen flying over the surrounding SDNP fields and grassland are thought to be nesting in the Valley Road area. A dry chalk valley that can suddenly flood down to the C7, it also contains patches of clay and biodiverse ponds. Aecom has described it as potentially a wildlife corridor: ‘...there is extensive priority habitat in the area, and this likely has strategic importance, as this is a concentration of habitat along a valley that links to the River Ouse corridor to the east....’¹⁰ The evidence for concentration of species biodiversity (as well as habitat) adds weight to this conclusion.

4. The Coast

The southern boundary of Peacehaven consists of a Site of Special Scientific Interest that starts in Brighton and ends in Newhaven. This is subject to erosion and changes daily with the weather, including the effects of waves and tides on the shingle and sea-wrack: sometimes the huge ammonites below the high-tide line are visible, sometimes they are overgrown with sea-weed. The rock-pools contain many inter-tidal species (sea-anemones, limpets, sea-snails, small crabs) and attract bird -life including egrets and oyster-catchers. Seals and dolphins can be seen from time to time. The evidence from the egg cases that wash up on the beach suggest a healthy offshore population of rays and catsharks/`dogfish`. The outflow pipe from the Centenary Park Waste Water treatment plant goes into the sea beyond the east end of Peacehaven beach, the storm overflows pipe from the Telscombe Portobello pumping station beyond the west end. Surfers use the beach access at the west end of the undercliff walk. Since 2023, some PTC councillors have raised the possibility of various actions, such as arranging for volunteers to test the purity of the seawater regularly; but PTC has taken no action so far to protect or improve biodiversity/nature recovery in the beach area. Volunteer litter-pickers are now very active along the beach and clifftop, and a project involving Peacehaven Community School has improved the east end (see ‘From Weald to Waves, above). The TFG might consider restoration of the SSSI as a top priority (even though it is not the responsibility of PTC), working with ESB&HLNRS – once lost, the SSSI biodiversity, which is patchy, may never be recovered.

Appendix D: OVCA Advice on how to promote biodiversity in three PTC Parks: Dell, Centenary and Oval

See separate attachments.



Peacehaven Town Council

Biodiversity Policy

Contents

1. Background
2. Definitions
3. Aims and objectives
4. Actions
 - i. Planning applications
 - ii. Land and property management
 - iii. Local community
 - iv. Partners
5. Monitoring

Appendix 1: Action Plan

1. BACKGROUND

In accordance with the duty imposed on town and parish councils by Section 40 of the Natural Environment and Rural Communities Act 2006, updated by Section 102 of the Environment Act 2021, Peacehaven Town Council (hereinafter referred to as the Council) which has any functions exercisable in relation to England must from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective.

This duty also means that town councils can spend funds in conserving biodiversity.

2. DEFINITION

According to Defra (Biodiversity 2020), biodiversity is the variety of all life on Earth. It includes all species of animals and plants – everything that is alive on our planet.

Biodiversity is important for its own sake and has its own intrinsic value. A number of studies have shown this value also goes further. Biodiversity is the building block of our 'ecosystems' that in turn provide us with a wide range of goods and services that support our economic and social wellbeing. These include essentials such as food, fresh water and clean air, but also less obvious services such as protection from natural disasters, regulation of our climate, and purification of our water or pollination of our crops. Biodiversity also provides important cultural services, enriching our lives.

3. AIMS AND OBJECTIVES

The object of this policy is to work towards conserving and enhancing the biodiversity of the Peacehaven area.

The Full Council and any committees of the Council will consider sustainability, environmental impact and biodiversity when making decisions and will develop and implement policies and strategies as required.

In particular, the Council will aim to improve the biodiversity of the area in the following ways:

- consider the potential impact on biodiversity represented by planning applications.
- manage its land and property using environmentally friendly practices that will promote biodiversity.
- support local businesses and council operations in the adoption of low impact / nature positive practices.
- encourage and support other organisations within the town to manage their areas of responsibility with biodiversity in mind.
- support residents and local organisation activities to enhance and promote biodiversity.

4. ACTIONS

Planning applications

The Council will:

- when commenting on planning applications, support site and building design that benefits biodiversity through the conservation and integration of existing habitats or provision of new habitats.
- support protection of sensitive habitats from development and will consider whether the development would mean the loss of important habitats for wildlife in respect of all applications.
- consider what each proposed development might make in terms of biodiversity net gain.
- include policies in support of biodiversity within the neighbourhood plan.

Land and property management

The Council will:

- carry out a biodiversity audit of its landholdings.
- consider the conservation and promotion of local biodiversity with regard to the management of

its open spaces. This will include adopting beneficial practices with regarding to cutting and removal of vegetation, composting, application of chemicals and timing of maintenance work, paying attention to the Government's [regulations for plant protection products](#).

- take special care in the specification of grounds maintenance contracts to ensure that the work, whilst reaching acceptable standards, does not harm the natural environment.
- source sustainable materials when procuring supplies for the Council's use
- consider biodiversity issues and the implementation of changes when managing its buildings.

Local community

The Council will:

- raise public awareness of biodiversity issues, including through its website and newsletters.
- engage with local businesses and residents regarding biodiversity in the community and how members of the community can assist and make a difference.
- where feasible, involve the community in biodiversity projects on its land including for example tree planting, wildflower meadows, birdbox making.

Partners

The Council will work in partnership with other organisations to protect, promote and enhance biodiversity within the council area.

It will review any local nature recovery strategies, species conservation strategies, or protected site strategies in respect of local Sites of Special Scientific Interest (SSSIs) and consider in general how it may become more involved in implementing the strategies' recommendations.

5. MONITORING

This policy was originally adopted on **10th December 2024** (Minute reference **C1309b(iv)**) and will be reviewed each year at the Annual Meeting. A summary of how the policy has been implemented will be published annually, with reference to the original biodiversity audit to show progress. The policy was adopted again at the Annual Council Meeting on 12th May 2026, and will next be reviewed at the 2027 Annual Council Meeting.

Appendix 1: Action Plan

SITE / OBJECTIVE	ACTION	OUTCOME	TARGET (Years)	REPORTING / PUBLICITY
Whole council area	Raise local awareness of biodiversity.	Gain local support for action.	Ongoing	Newsletter, social media, website
Protect and support biodiversity	Encourage suitable planting to support biodiversity.	Connect & diversify habitats to meet the needs of a variety of wildlife species	Ongoing	Mapping
Recreation grounds	Sympathetically maintain hedging. Leave some areas unmown. Only use environment friendly pesticides where absolutely necessary and only in ideal weather conditions.	Food sources and cover Encourages insects. Sustain and enhance natural habitats.		
Common / other open spaces	Maintain and follow a management plan. Encourage residents to remove litter and pick up after their dogs. Work with the county council on verge management, favouring biodiversity but noting which areas may need cutting for highway safety. Encourage residents to adopt areas to look after, making it clear what is expected e.g. peat free compost and no chemicals.	Sustain and enhance natural habitats. Protecting habitats Protecting/enhancing habitats Regular attention.		
The Built Landscape	Ensure that planning consultations are considered against the requirements of the Neighbourhood Plan Encourage hedgehog/small animal highways with permeable boundaries	Protecting/enhancing habitats Extending habitats.	Ongoing	

Increase community awareness of biodiversity	Ask residents for their views on what they would like to be done to conserve biodiversity within the town. Raise awareness of the importance of gardens as habitats for wildlife, with possible actions highlighted in the eNews. Have a page on the town council website for photographs / information / links Discourage light pollution.	Engagement/ownership of biodiversity Promote biodiversity. Promote biodiversity. Protect nocturnal animals.	Ongoing	
Support Community Projects	Support hedge/tree planting in any appropriate areas. Work in partnership with the school to develop young people's awareness of the environment around them. Consider events and offer volunteering opportunities to support biodiversity, working with local organisations.	Extending habitats. Promote biodiversity. Promote biodiversity.		

Advice Template	
Site	Centenary Park (Big Park), Piddinghoe Avenue, Peacehaven
Group	Peacehaven Town Council
Date	02.07.2025
Present	Dr Dan Danahar, Kevin Bray - PTC Parks Officer, Cllr Mary Campbell, Jessie Rodriguez, (Leo Moulder - Work Experience).

Site specific advice

We acknowledge that large areas of Centenary Park are managed as pitches and other areas for recreational activities and therefore have focused mostly on the benefits of the areas already dedicated for wildflower meadows and scrub. We congratulate the Town Council on there efforts thus far and obvious successes. Furthermore, we appreciate their engagement with the Ouse Valley Climate Action Project to create more gains for biodiversity, for the benefit of the local community and environment.

In most parts of the park, we assumed the geology to be clay capped chalk and chalky (rendzina) soils, at times we encountered loess loam and thus recommend checking different areas by digging test holes or using auger (mind services!!) before you carry out any habitat restoration. The Sussex Geodiversity website (<https://geodiversitysussex.org.uk/geodiversity>) maps the park as being straddled by the clay of the Lambeth Group LMBE (Woolwich & Reading Formations - WRB) and the Chalk group CK (Grey Chalk & white Chalk Subgroups – GYCK/WHCK). In some locations (especially amenity sites) rubble and other soils may have been brought in to landscape the park and in places the soil profile may have been disrupted by the plant machinery during the development stage.

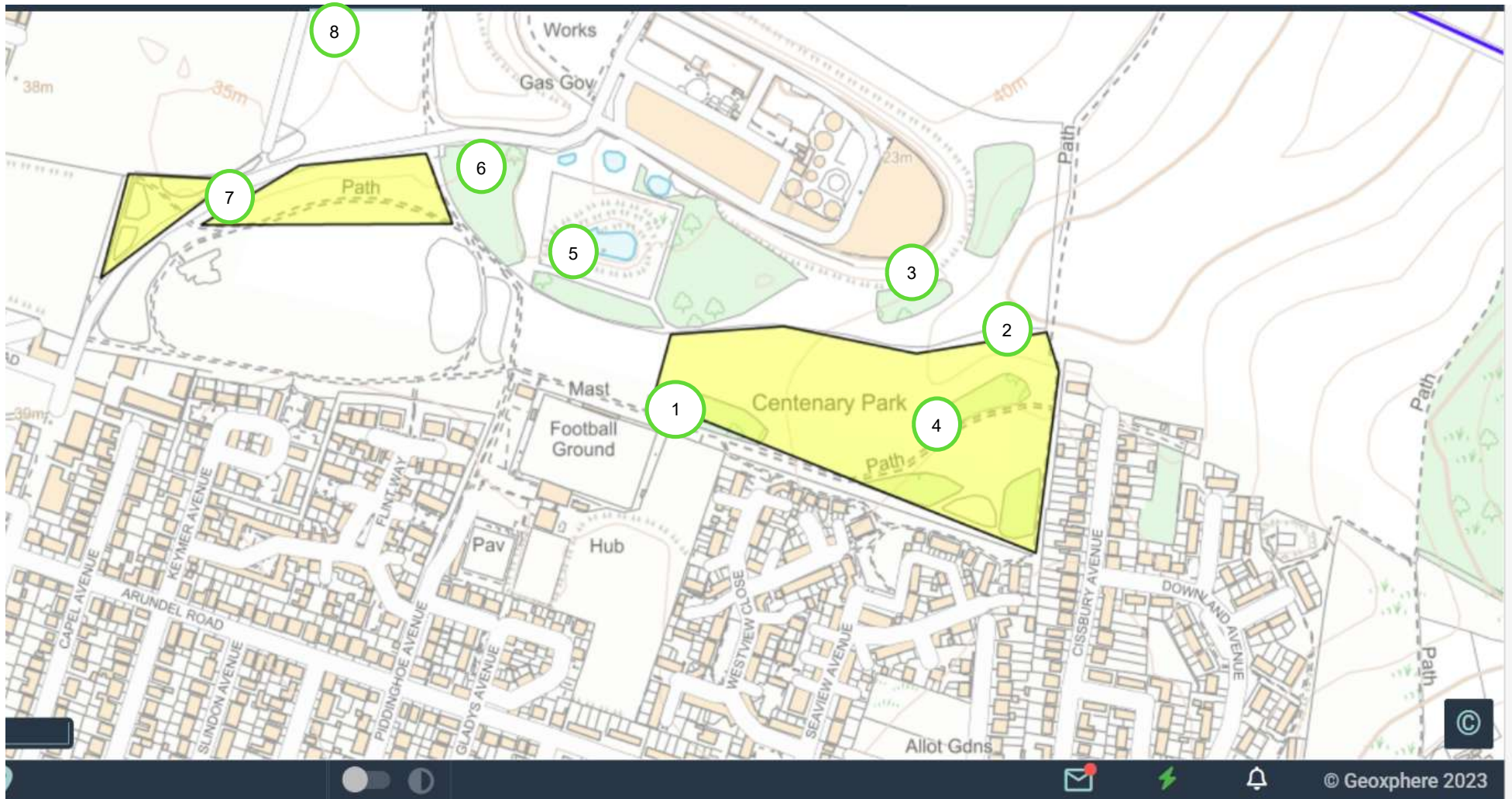
The location of the park is important for migrating species that may require shelter and food after crossing the channel and is a gateway to the extensive South Downs National Park. Subsequently, it is an important site to look for European species whose northerly distributions have expanded because of the influences of climate change. Consequently, the park has a lot to offer butterfly and bird conservation, because they have the potential to be one of the first stops before such species are funnelled by the contours of the land towards the River Ouse valley, where under favourable conditions they may establish new colonies.

Area 1

Planted Woody Copse

A sympathetically planted copse with some existing glade and meadow species. We suggest creating glades by thinning out the scrub and leave landscape trees for nesting birds, thus creating a greater habitat mosaic and more ecotone (edge habitat). New glade establishment could increase on a rotational basis annually. Any Blackthorn can be left to spread through natural suckering as this is the host plant to the Brown Hairstreak Butterfly. Consider monitoring these plants October to March to look for eggs in the nodes (again ask Sussex BC for volunteers). These appear as white dots between forking branches. Add Purging (usually on chalk) and Alder Buckthorn (usually on clay) to this area, as this is the hostplant for the Brimstone Butterfly.





Area 2

Elm Avenue; Gateway to the Downs

Cut and collect in October around the trees, not around the younger trees.

Cut the sward in May or even early June, once or every other year because rank/dominant grasses respond less favorably to this form management, but it allows wildflowers, and meadow grasses a chance to establish. Hay collected in this way can be sold as fodder or as the species richness of the site improves, it can be spread on recipient sites to improve species richness elsewhere. We suggest annual records are made and stored of wildflower and grasses are recorded. Look again in September/October and potentially cut in October again and bale, again possibly a sympathetic Farmer, or collaboratively owned cut and collect mower.

Area 3

Southern Water Land

In the last 5 years this area has been cut and baled by a local farmer once, worth encouraging SW to explore this once again.

Area 4

Meadow area

To improve this site, we suggest a cut and collect approach to mowing, as well as increasing species richness by introducing plug plants. Recommended species include bird's-foot Trefoil, Scabious, Black Knapweed and Greater Knapweed, Ladies Bedstraw and chalk downland specialist species such as the Horse-shoe Vetch and Kidney Vetch were low nutrient neutral or chalky soil known to occur, and as has been said before they are the hostplants of the Adonis Blue (*Polyommatus bellargus*) and Chalkhill Blue (*Polyommatus coridon*) butterflies. Again, plant a 2 m wide band at the top of the bank and leave the lower bank to colonise naturally. Try sowing some areas with Yellow Rattle (a hemiparasitic of grasses, which diminishes their dominance in the sward and allows wildflowers to compete more successfully with them) Yellow rattle seed can be collected locally with a sweep net but can also be purchased from the Wildflower Conservation Society Nursery, Stanmer Park. Have students undertake percentage cover quadrant studies to monitor and compare areas sown with Yellow Rattle in comparison with those that have not.

Consider, making 100m²+ scrapes in any south facing slopes and sowing with either *Festuca ovina* or *F. rubra*. These are the host plants of the Silver-spotted Skipper (*Hesperia comma*), this butterfly species has shown a significant expansion in range since climate change has started to have an impact. It was formally a very rare butterfly, restricted to one or two sites in Sussex. For local information about this species see Dr Dan Danahar's YouTube films: [Episode 14 - Looking for the Silver-spotted Skipper in the Brighton & Lewes Downs Biosphere](#).

Area 5 & Area 6

Scrub Grassland Area

Southern Water land could use thinning to create glades as many *Satyridae* family of butterflies us grassy areas. Consider creating 1-2m margin/ecotone between the amenity grassland and the scrub to be mown May and October.

Area 7

Wild Meadows either side of the Southern Water Track

This area contained good quality meadows with promising species diversity, cut and collect at the end of the season ideally October. Consider creating 1 to 2m margin/ecotone between the amenity grassland and meadow to show intentionality and add habitat for invertebrates. Furthermore, also consider creating 1-2m margin/ ecotone between the amenity grassland and the path to be mown May and October on the football pitch side of the path. Lewes Football Club are trialing some interesting 'renaturing' alongside the football facilities and looking at the potential effects on performance and player wellbeing.

Area 8

Peacehaven Community Orchard

Mow, cut and collect pathways to manage people and experiment with cut and collect patches in May and Oct to allow more wildflowers to develop in grass dominated areas. Also consider paths for orchard work as this adds to the invertebrate and flora diversity.

Habitat creation for butterflies on suitable chalk sites.

We suggest using plug plant species such as Bird's-foot Trefoil, Scabious, Black Knapweed and Greater Knapweed, Ladies Bedstraw and chalk downland specialist species such as the Horse-shoe Vetch and Kidney Vetch where low nutrient neutral or chalky soil are known to occur. These species are the host plants of the Adonis Blue (*Polyommatus bellargus*) and Chalkhill Blue (*Polyommatus coridon*), as well as the Small Blue (*Cupido minimus*) butterflies. Plant a 2 m wide band at the top of any bank and leave the lower parts of a bank to colonise naturally, by falling seed. For local information about these species see Dr Dan Danahar's YouTube films: [Episode 9 - Looking for the Adonis Blue butterfly in the Brighton & Lewes Downs Biosphere](#), [Episode 15 - Looking for the Chalkhill Blue outside the Brighton & Lewes Downs Biosphere](#), [Episode 8 - Looking for the Small Blue in the Brighton & Lewes Downs Biosphere](#)

Additionally, the use of Wild Strawberry (*Fragaria vesca*) Agrimony (*Agrimonia eupatoria*) and Creeping Cinquefoil (*Potentilla reptans*) plant plugs, in bare chalky ground may have benefits for the Grizzled Skipper (*Pyrgus malvae*), as the Sussex Butterfly Atlas (Blencowe & Hulme, (2017) The Butterflies of Sussex, Pisces Publications) identified many viable colonies in the region. See: Dr Dan Danahar's YouTube film [Episode 4 - The Grizzled Skipper \(Pyrgus malvae\) the director's cut](#), which outlines the necessary management for this species.

Sowing Broad-leaved Everlasting Pea (*Lathyrus latifolius*) in more formal areas such as around the cafe, may encourage the Long-tailed Blue. This a continental migrant butterfly which has been expanding the northern limits of its European distribution in response to changing climate. See: Dr Dan Danahar's YouTube film [Episode 3 - The Long-tailed Blue \(Lampides boeticus\)](#), which outlines the colonisation of this species locally.

Notes

- Baseline surveys are recommended for plants, birds, butterflies, mammals, etc. Engaging local volunteers can be useful in this respect. Take fixed point photographs before any changes are made to the management in any location, to illustrate the benefits of the work.
- We suggest monitoring butterflies (in this and other areas) using a transect, see the UK Butterfly Monitoring Project to record sightings/ transect (<https://ukbms.org>). Contact the Sussex branch of Butterfly Conservation to see if they can encourage volunteers to undertake this work: julia_lowsonsmith@yahoo.co.uk, +44 7802 174944.
- It would be advisable to contact the local British Trust for Ornithologists volunteers to establish if counts occur, any records and establish a survey.
- Tree saplings (of local provenance) can be obtained from Special Branch Tree Nursery, Stanmer. Contact: Chris Perry/ Martin Verrall 07796 592786 for prices and availability.
- Wildflower plugs (of local provenance) can be obtained from Wildflower Conservation Society Nursery, Stanmer Park (Tuesdays). Contact: Sally Graham - Macleod 07717 302917 for prices and availability.



Advice Template	
Site	The Dell
Group	Peacehaven Town Council
Date	02.07.2025
Present	Dr Dan Danahar, Kevin Bray- PTC Parks Officer, Cllr Mary Campbell, Cllr Sue Griffiths, Jessie Rodriguez, (Leo Moulder Work Experience)

Site specific advice

We acknowledge that large areas of The Dell are managed for recreational activities (including car boot fairs) and therefore in this report we have focused mostly on benefits for the wilder areas and those that present most potential for biodiversity gain. We congratulate the Town Council on their efforts thus far, which demonstrate many obvious successes. The Ouse Valley Climate Action Project is delighted to work in partnership with the Town Council to create more gains for biodiversity, for the good of the local community and for the natural environment.

The underlying Castle Hill Beds of the Lower Culver Chalk Formation are sedimentary rocks of marine origin and are largely comprised of the skeletal remains of planktonic algae known as coccolithophores which accumulated to form a white ooze on the seafloor. This soft sediment was later compacted and hardened (lithified) to form Chalk – a relatively soft rock itself. The purity of the Chalk indicates its formation took place far from land, free of terrestrial sands and silts that would otherwise have coloured it. This could be why the site hosted a quarry/chalk pit, now disused (<https://geodiversitysussex.org.uk/geodiversity/SussexGeology.php>). We would recommend signage that outlines the history of this site.

The location of this park is important for migrating species that may require shelter and food after crossing the channel. Furthermore, it is very accessible to the public and more specifically families that would be unlikely to venture into the South Downs National Park. Subsequently, it is an important site to look for European species whose northerly distributions have expanded because of the influences of climate change. The Dell has potential to be one of the early stops before such species are funneled by the contours of the land towards the River Ouse valley, where under favorable conditions they may establish new colonies.

Area 1

This area is the most botanically rich grassland on the site and is probably good for specialist invertebrates too. Water slippage has created areas of exposed soil being utilized by invertebrates, so we suggest an invertebrate survey is conducted. Wildflower species already present include Bird's-foot Trefoil, White Clover, Mouse Ear, Ribwort Plantain, Selfheal, Thyme and Gorse. To avoid the Gorse from dominating the sward we suggest it is cut back hard to halt its growth and cover.

Area 2

In easterly section of Area 2 we suggest cutting a much deeper path to reduce brambles and create a greater ecotone. The presence of Gorse here suggests a superficial clay cap resting on the Culver chalk bedrock formation. The British Geological Survey map (Sheet 319/334) confirms this is very likely. Subsequently, chalk downland species have not done so well. Checking the geology here would be wise and could inform any reseeding policy,

i.e. the move away from chalk downland species to neutral or more acid loving species. We suggest, cutting and collecting in late Sept or Oct and leaving the existing Oxeye Daisies, as they are beneficial to some species of moths.

Area 3

This north easterly corner of the plot was once ear marked for housing and subsequently has access from the pavement and bus stops. This would be an accessible location to demonstrate wilder gardening techniques and permaculture including some food growing. A vegetation only, compost for slow worms would be desirable, this can be made with rat proof composters. We suggest garden escapes are not encouraged and should be removed where possible. Furthermore, we would encourage scrub removal and utilize the PTC owned plot adjacent to Yemeni Coffee Garden. Consider removing some privet scrub but leaving the hedging as windbreak. The area was cut previously 2014 and there are complaints about rats in area, clearance would be beneficial to householders, as the disturbance and activity should discourage them. The rats are likely to be attracted to food outlets and households and not the scrub.

Area 4

This Sussex Geological Site is registered as a disused quarry on the Sussex Geodiversity site (see above for the link) possibly a pre-historic chalk pit. We suggest cutting back the gorse on the south facing slope of the meadow to restore the grassland flora. From a health and safety perspective, it might be best achieved with plant machinery. Scrape one or two areas down to chalk in the sunny areas on the flat and reseed with chalk downland species or plug plants. If funding for plants is unavailable the scrapes could be allowed to be colonised by the local biota. Consider creating small scrapes and introducing Yellow Rattle to the inaccessible grassy slope, this plant will parasitize the grasses enabling more diversity.

Area 5

Cut and collect in late September/October.

Area 6

Leave an unmown margin of 1m along the fence line. See what species arise, consider plug planting if not much diversity.

Area 7

This south facing bank was last mown in 2020. The grassland looks like a good quality section of chalk downland meadow and will have a minimum of 30m of Lower Culver Chalk beneath. It contains Black Knapweed, Bird's-foot Trefoil, Ladies Bedstraw, Carrot, Red Clover, Selfheal and Ragwort. Cut and collect annually leaving a margin to show it is intentional. Leave 1m margin along the whole fence line along A259 and consider a native hedge in play area as shelter and improvement in terms of biodiversity and safety of the area.

Area 8

This shelter hedge is needed due to the proximity to the sea, we suggest planting other species when the opportunity arises such as Purging Buckthorn or Hawthorn which provides nectar, nesting opportunities and fruit whilst withstanding the extreme conditions.

Area 9

Leave the first 2m from fence line unmown, as beyond the fence is untouched maritime grassland and this will allow species to spread. It will also keep people away from the cliff edge.

Area 10

This east facing slope (used for car boot sales) is currently cut every 4 weeks, we would recommend cutting every 8 weeks (change to 6 weeks if 8 is too long). This would produce a slightly longer and more diverse grassland, whilst maintaining car and wheelchair access. Some biodiversity gains may occur; there would be less erosion and additional carbon capture. We also suggest leaving a band of longer grass along play area fence.

Grassland Management

We suggest cutting meadow margins to a height of 0.1m/10cm around these un-mown areas, as these “Managed Margins” show that this land management is deliberate. The margins can be between 0.5 - 2 metres deep. If people repeatedly walk over some of the long areas (usually the most direct route for crossing an area) mow these desire lines in the uncut areas to create paths, the edge effects created add ecological complexity and thus benefits the habitat diversity.

‘Cut and collect’ is hugely beneficial management technique for biodiversity gains and also has some practical and economic implications but it would be worth investigating if contractors can accommodate these changes, a sympathetic farmer could be involved for free hay and/or grant funding for a collaboratively owned cut and collect mower with other Havens or town councils hiring the equipment (current hire cost is currently £550-£600 per week and this could be reduced to maintenance costs to enable more use). Jessie to investigate funding options; South Downs National Park Re Nature Fund will be open again Sept/Oct.

Habitat creation for butterflies on suitable chalk sites.

We suggest using plug plant species such as Bird’s-foot Trefoil, Scabious, Black Knapweed and Greater Knapweed, Ladies Bedstraw and chalk downland specialist species such as the Horse-shoe Vetch and Kidney Vetch where low nutrient neutral or chalky soil are known to occur. These species are the host plants of the Adonis Blue (*Polyommatus bellargus*) and Chalkhill Blue (*Polyommatus coridon*), as well as the Small Blue (*Cupido minimus*) butterflies. Plant a 2 m wide band at the top of any bank and leave the lower parts of a bank to colonise naturally, by falling seed. For local information about these species see Dr Dan Danahar’s YouTube films: [Episode 9 - Looking for the Adonis Blue butterfly in the Brighton & Lewes Downs Biosphere](#), [Episode 15 - Looking for the Chalkhill Blue outside the Brighton & Lewes Downs Biosphere](#), [Episode 8 - Looking for the Small Blue in the Brighton & Lewes Downs Biosphere](#)

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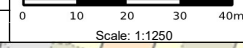
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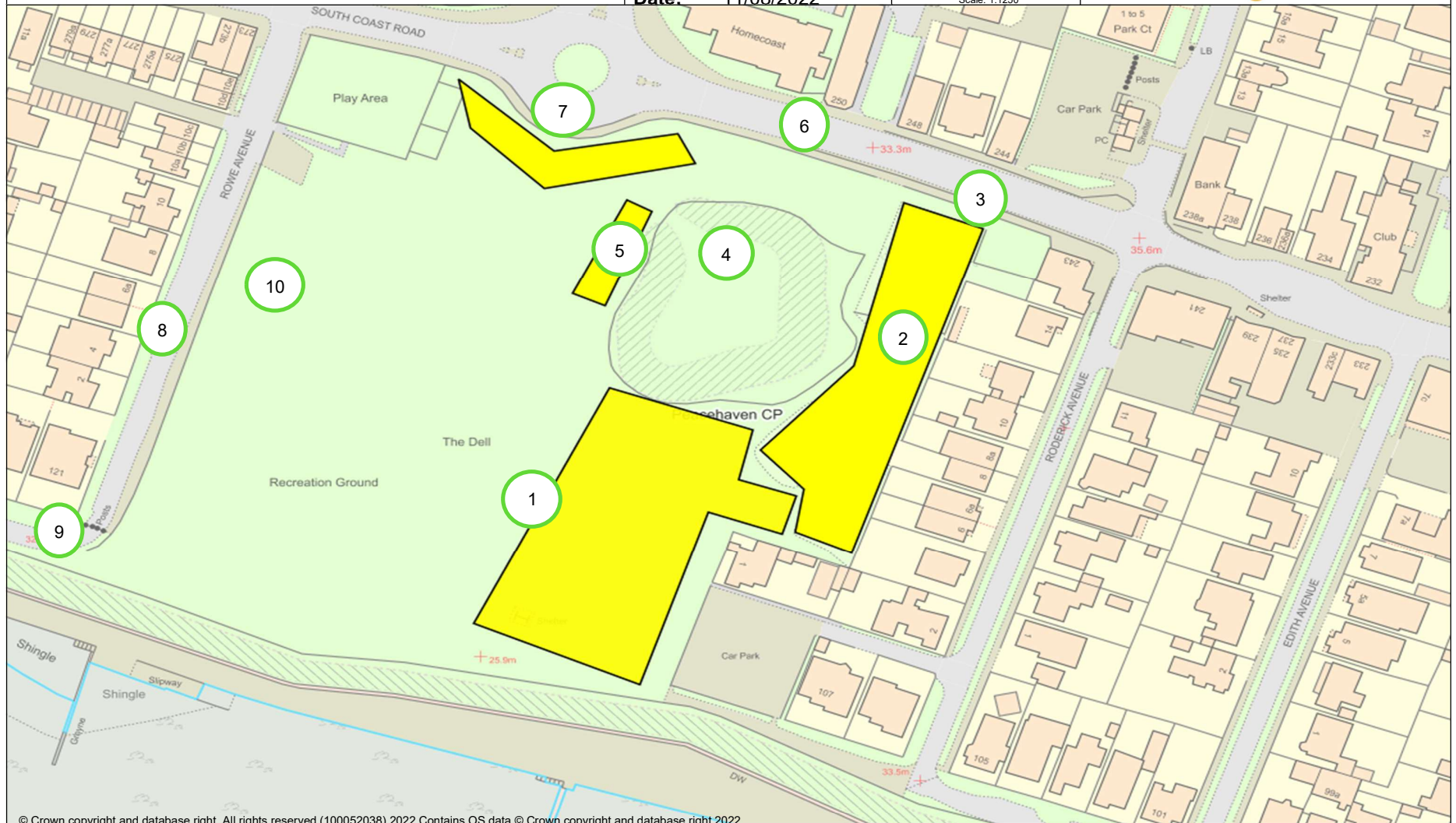
Peacehaven

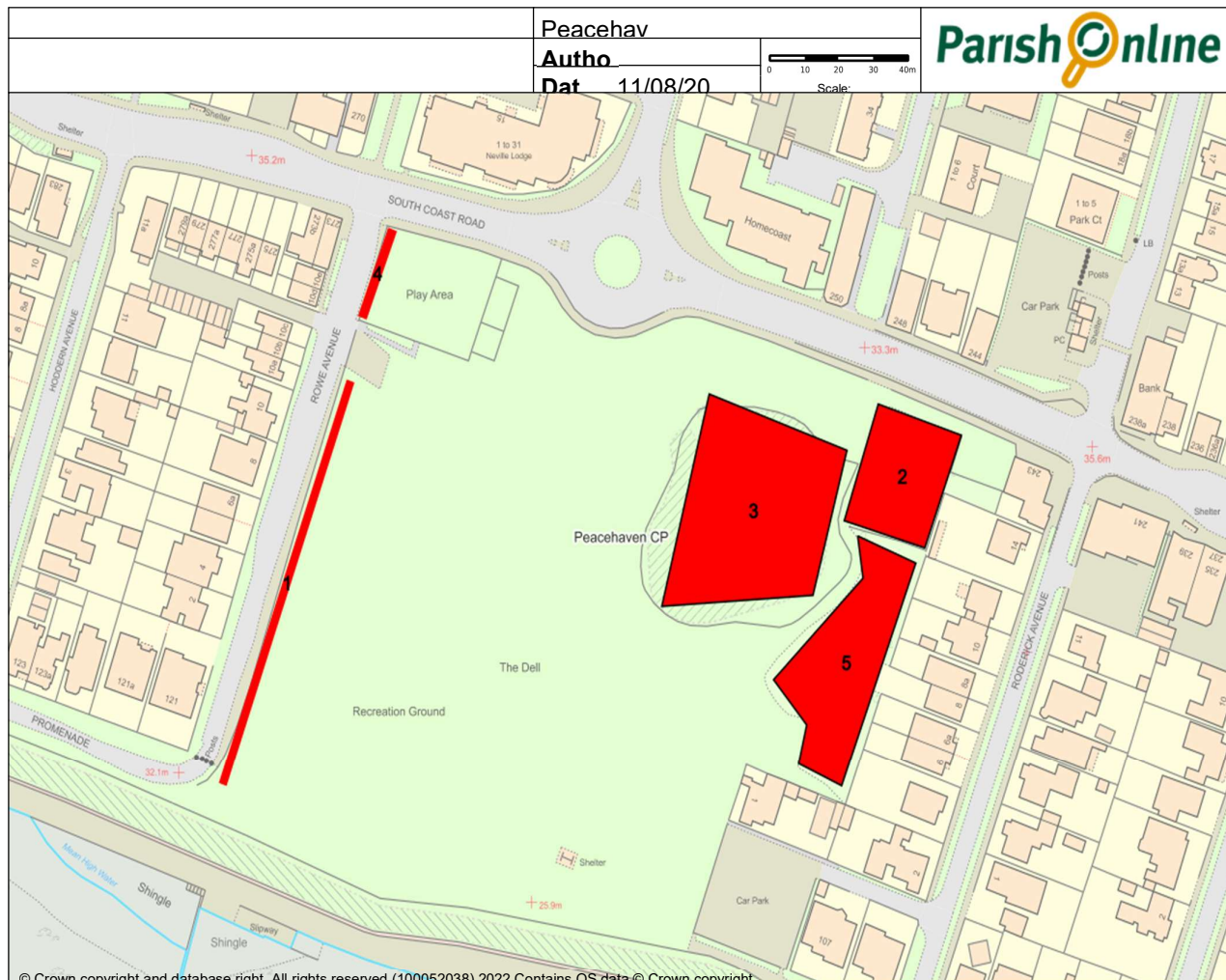
Author:

Date: 11/08/2022



ParishOnline





The Dell hedges and scrub areas

1. Rowe avenue – mixed hedge to be cut once a year in late summer/ autumn- consider introducing other species such as hawthorn.
2. Northeast scrub area privet hedges – to be cut twice a year.
3. Scrub area in the crater – cut back once a year to halt ingress on to the grass area- Consider creating glades on 3–5-year rotation.
4. Playground – hedge cut as required to keep clear the sightline to the road and growth over the playground.
5. Wild scrub area – left untouched if possible.

Peacehaven

Author:

Date: 02/06/2025

0 10 20 30 40m
Scale: 1:1250 @ A4

PARISH
ONLINE



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The Oval Biodiversity Gains Assessment

Advice Template	
Site	The Oval, Peacehaven
Group	Peacehaven Town Council
Date	02.07.2025
Present	Dr Dan Danahar, Kevin Bray, Cllr Kira Gordon-Garrett, Cllr Mary Campbell, Jessie Rodriguez, (Leo Moulder Work Experience)

Site specific advice

We acknowledge that The Oval that was donated to Peacehaven Town Council (PTC) is largely used by the local community for dog walking, picnics and to admire the local flora and fauna (as verified by the PTC use survey).

As is the case with all wilder places in Peacehaven, the location of this park is important for migrating species that may require shelter and food after crossing the channel and therefore, is a gateway to the extensive South Downs National Park. Subsequently, it is an important site to look for European species whose northerly distributions have expanded because of the influences of climate change. The park has a lot to offer butterfly and bird conservation, because the Oval has the potential to be one of the first stops before such species are funneled by the contours of the land towards the River Ouse valley, where under favorable conditions they may establish new colonies.

We observed plentiful Gorse and Bracken during our onsite inspection, indicating a geology of clay on top of chalk. The British Geological Survey, Sheet 319/334 Lewes and Eastbourne map shows the bedrock to be Newhaven chalk formation, capped in places with Lambeth group clays. We recommend digging test holes or using an auger (mind services!!) before any habitat management is carried out, to determine the plant assemblages that would be expected on these soils. It is also possible that on some sites rubble and other soils could have been brought in or the soil profile may have been disrupted by the reprofiling.

A community BioBlitz was conducted in March 2025 on The Oval and the Valley and there are significant numbers of internationally and nationally protected species available through the Sussex biodiversity Records Centre. Peacehaven Community Garden (PCG) has been established in the southwestern corner of the site and is run by volunteers. PCG contains some significant trees with TPO'S within and around the boundary. The PCG contains a moth garden, hibernaculum and mini pond, all immensely beneficial for wildlife. Blackthorn is the host plant to the Brown Hairstreak Butterfly and if this is to be found at the Oval it can be left to spread through natural suckering. We suggest looking for the eggs of this species from October to March in the forks of the branches, where they appear as white dots (0.5mm in diameter). For local information about these species see Dr Dan Danahar's YouTube films: [Episode 17 - Looking for the Brown Hairstreak in the Brighton & Lewes Downs Biosphere](#)



Grass Cutting

Area 1

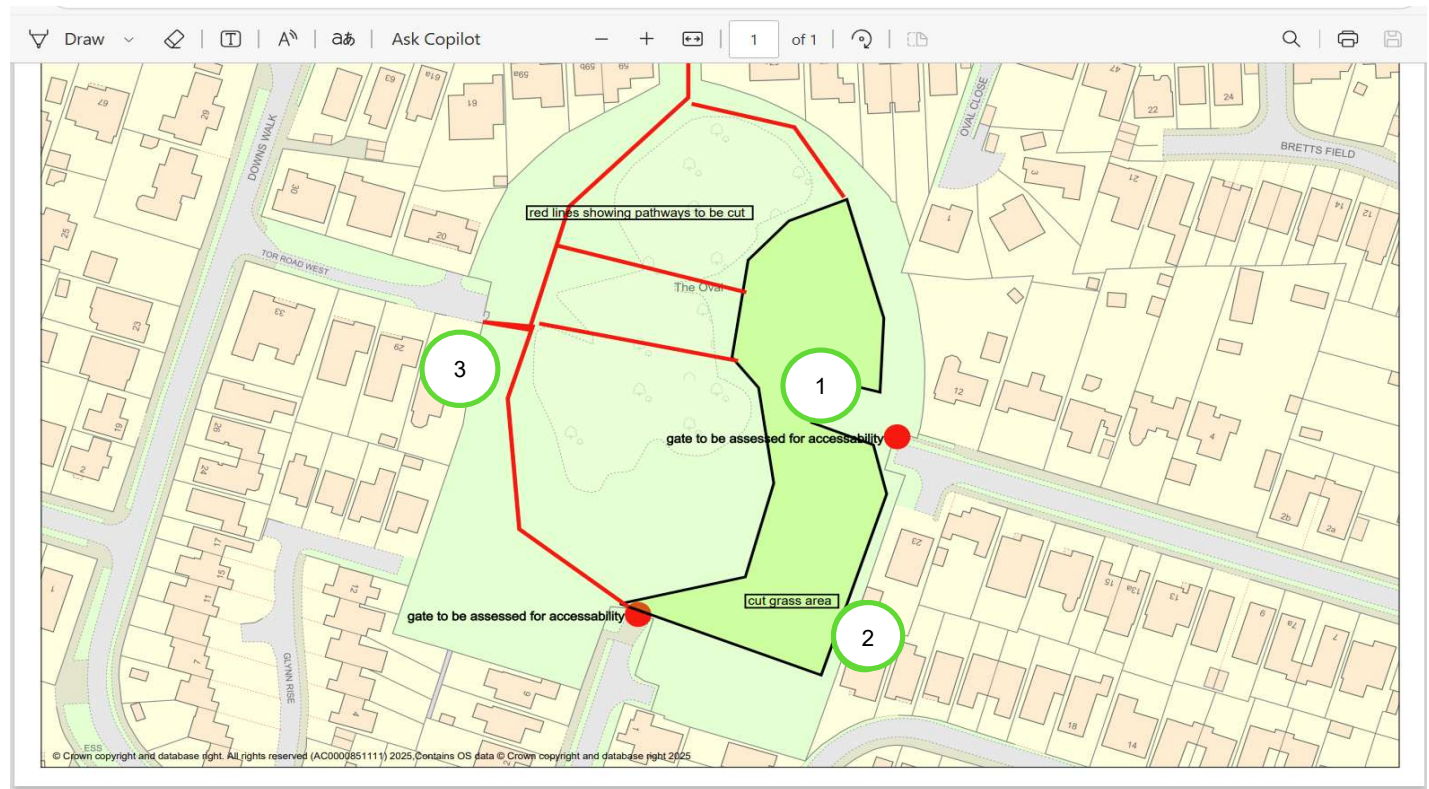
Mole (*Talpa europea*) hills were abundant here and despite their commonality, moles are poorly researched due to their secretive, underground nature, making population and distribution data somewhat ambiguous. We suggest making this a high interest priority species, promoting observations of its behaviour and ecology through community engagement and public signage. Working in partnership with organisation like the Sussex Wildlife Trust or local universities, this mole population could be monitored and the research made public. Research on how small scale changes in topography, caused by moles, might influence invertebrate ecology could make some original discoveries. It may be advisable to meet with accessibility users or an advisory group to prioritise a safe pathway, cut to a height of 50mm, whilst trying to avoid areas with the highest density of mole hills. This would demonstrate reasonable precautions had been taken to prevent injury or accident.

Area 2

This site is peppered with insect holes in the bare soil which may have been created by specialist invertebrates. Mow alternate halves every 6 weeks or so. Rabbit grazing is helping to create the varied mosaic of habitat and hugely beneficial to the site. Dog walkers tend to pick up more on mown areas. The site would benefit from more natural management. We would suggest that people engagement work required to facilitate change. Jessie can help explore approaches to this.

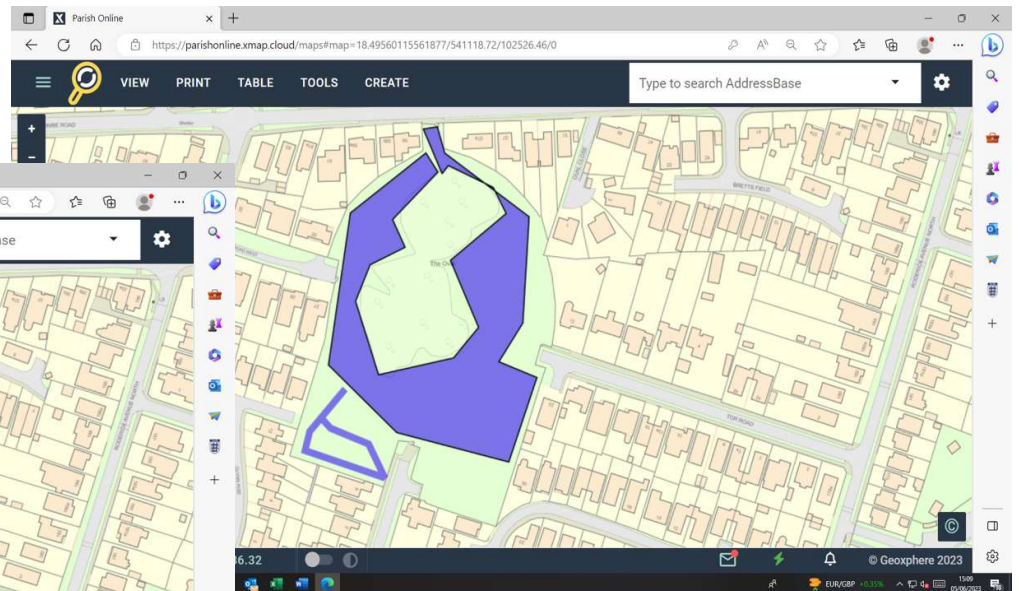
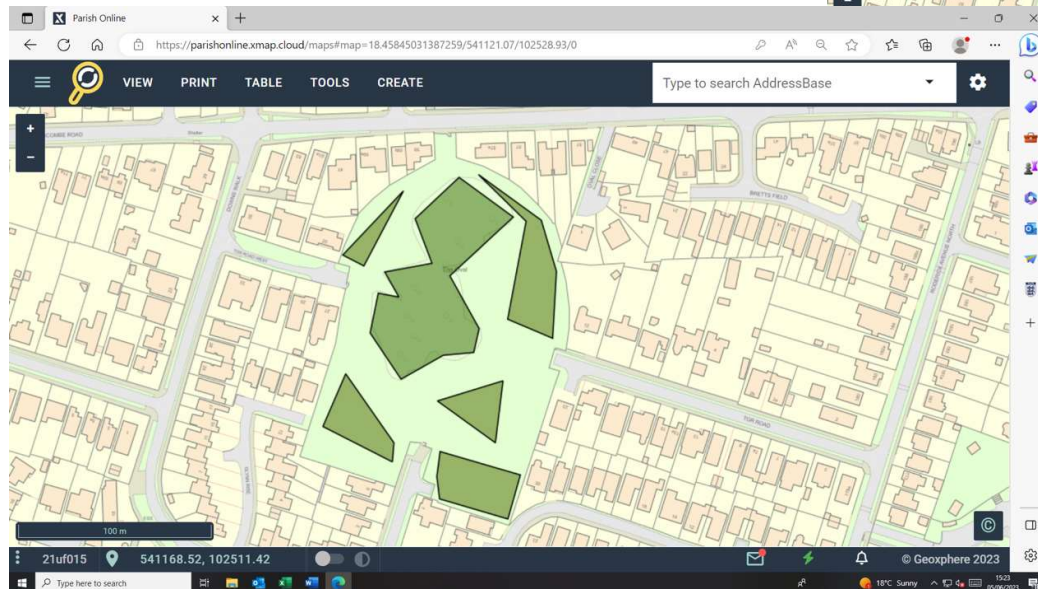
Area 3

Cut sections of the Bracken back in the spring to vary Bracken/grass heights, especially along path edges, giving a graded ecotone, to provide better habitat for invertebrates and a varied temperature gradient.



Trees

The trees (purple in the adjacent map) are currently inspected every 3 years - in house inspections and independent contractor. We suggest reducing Silver Birch and Holm Oak, in preference for Beech, Alder Buckthorn (or Purging Buckthorn if chalk).

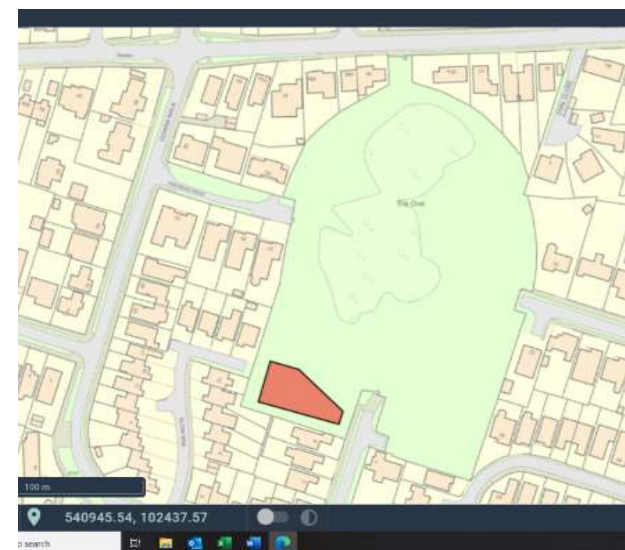


Wilder Areas

Gorse and scrub (green in the map above) are hugely beneficial to birds and invertebrates but consider a 3–5-year rotation coppice of patches of Gorse so that the age structure is more diverse on the site and the Gorse does not die off at a similar age. The created glades will allow greater floral diversity, if the Gorse mulch not too thick (this may need to be raked up). The Gorse regrowth will be beneficial to many butterflies and moths.

Peacehaven Community Garden

This is in the southeast of the Oval and is maintained by volunteers (rust coloured in the map to the right). It has several mature Sycamore trees protected by TPO's and they have low conservation value. If opportunity arises plant Purging (if chalky) or Alder Buckthorn in this area, as it is the food plant for the Brimstone Butterfly. Avoid planting Silver Birch and other species not in keeping with the natural succession that should take place on this geology, which



would be pioneered by Ash, followed by the climatic climax vegetation of either Beech or Yew woodland (depending on the soil depth). A hazel coppice could be appropriate in parts of the garden. The garden has several wildlife friendly features such as a mini pond, hibernaculum, a moth garden and there are raised beds and composters.

Cut and collect the meadow areas in Sept/Oct and consider planting plug plants appropriate to soil in profile in the Community Garden.

Benches

Should the opportunity arise, we suggest the installation of more natural benches e.g., tree trunks pegged to prevent rolling, in suitable places to create more invertebrate habitat. Leaving dying or dead standing wood in less accessible areas or at a height not considered dangerous, would be advantageous for a host of different organisms, as would a pile of cut wood in secluded places for invertebrates and hibernating amphibians and reptiles.

The Oval Aerial Satellite View



Grassland Management

We suggest cutting meadow margins to a height of 0.1m/10cm around these un-mown areas, as these “Managed Margins” show that this land management is deliberate. The margins can be between 0.5 - 2 metres deep. If people repeatedly walk over some of the long areas (usually the most direct route for crossing an area) mow these desire lines in the uncut areas to create paths, the edge effects created add ecological complexity and thus benefits the habitat diversity.

‘Cut and collect’ is hugely beneficial management technique for biodiversity gains and also has some practical and economic implications but it would be worth investigating if contractors can accommodate these changes, a sympathetic farmer could be involved for free hay and/or grant funding for a collaboratively owned cut and collect mower with other Havens or town councils hiring the equipment (current hire cost is currently £550-£600 per week and this could be reduced to maintenance costs to enable more use). Jessie to investigate funding options; South Downs National Park Re Nature Fund will be open again Sept/Oct.

Habitat creation for butterflies on suitable chalk sites.

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Sowing Broad-leaved Everlasting Pea (*Lathyrus latifolius*) in more formal areas may encourage the Long-tailed Blue. This a continental migrant butterfly which has been expanding the northern limits of its European distribution in response to changing climate. See: Dr Dan Danahar’s YouTube film: [Episode 3 - The Long-tailed Blue \(Lampides boeticus\)](#), which outlines the colonisation of this species locally.

Notes

- Baseline surveys are recommended for plants, birds, butterflies, mammals, etc. Engaging local volunteers can be useful in this respect. Take fixed point photographs before any changes are made to the management in any location, to illustrate the benefits of the work.
- We suggest monitoring butterflies (in this and other areas) using a transect, see the UK Butterfly Monitoring Project to record sightings/ transect (<https://ukbms.org>). Contact the Sussex branch of Butterfly Conservation to see if they can encourage volunteers to undertake this work: julia_lowsonsmith@yahoo.co.uk, +44 7802 174944.

- It would be advisable to contact the local British Trust for Ornithologists volunteers to establish if counts occur, any records and establish a survey.
- Tree saplings (of local provenance) can be obtained from Special Branch Tree Nursery, Stanmer. Contact: Chris Perry/ Martin Verrall 07796 592786 for prices and availability.
- Wildflower plugs (of local provenance) can be obtained from Wildflower Conservation Society Nursery, Stanmer Park (Tuesdays). Contact: Sally Graham - Macleod 07717 302917 for prices and availability.
- We recommend “Managed Margins” which are cut margins (0.5m deep) around un-mown areas, as these show that this land management is deliberate. If people repeatedly walk over some of the long areas, then mow these desire lines in the uncut areas to create paths. The edges created add biodiversity benefits for insects due to the temperature gradients.
- ‘Cut and collect’ is hugely beneficial management technique for biodiversity gains and also has some practical and economic implications. You will need to use a sacrificial area that cuttings can be composted which is beneficial to reptiles and lizard such as grass snake, common lizards and slow worms. The associated slugs are also great source of food for amphibians and hedgehogs.

We were given a world full of things we could never create ourselves, yet we keep destroying them to build things we think we cannot live without.

Trees that took decades to grow. Rivers that gave life to everything around them. Fresh fruit, clean water, wild animals, and sunlight that reaches every corner of the earth without asking anything in return.

It was all here before us. All we had to do was take care of it.

But somehow, we became so obsessed with building the future that we started destroying the very world that future depends on. Forests are cleared, natural spaces disappear, and the living things that once called those places home are left with nowhere to go.

And for what? More servers, more computing power, more technology that promises to make our lives easier while the things that make life possible are slowly being pushed aside.

There's something deeply sad about being intelligent enough to build machines that can think, yet failing to understand the value of the world that gave us the ability to think in the first place.

We are so busy building a smarter world that we seem to be forgetting how to take care of the one we already have



Committee:	Environment & Sustainability	Agenda Item:	ES45
Meeting date:	3 rd November 2026	Authors:	Cllr Griffiths
Subject:	Business Plan		
Purpose:	To decide on items relating to this committee which should be included on the PTC Business Plan		

Recommendation(s):

That this committee discuss and decide if they want to include the two business plan items referred to us by L&A And discuss any other items that the committee believes should be included.

1. Background

At its meeting on the 8th of September 2026, the Leisure & Amenities Committee referred two items from its Business Plan to this committee, as this committee did not exist when the Business Plan was written, and it was thought that the Environment & Sustainability Committee would be a better fit.

2. Options for Committee

To agree/disagree that 'Promoting Sustainability' is included in the Business Plan for the ES committee

To agree/disagree that 'to encourage urban greening ' is included in the Business Plan for the ES committee

To discuss any other items that the committee would like to see in the Business Plan, bearing in mind the remit Of the Environment and Sustainability Committee.

3. Reason for recommendation

To create a Business Plan for the ES Committee, which was created after the Business Plan was written.

4. Expected benefits

To focus the committee on its role and inform its actions.

5. Implications

5.1 Legal	
5.2 Risks	
5.3 Financial	
5.4 Time scales	
5.5 Stakeholders & Social Value	
5.6 Contracts	
5.7 Climate & Sustainability	Yes
5.8 Crime & Disorder	
5.9 Health & Safety	
5.10 Biodiversity	Yes
5.11 Privacy Impact	
5.12 Equality & Diversity	

6. Values & priorities alignment

Which of the Core Values does the recommendation demonstrate?	
6.1 Empowering and supporting the community	☒
6.2 Growing the economy sustainably	☒
6.3 Helping children and young people	☐
6.4 Improving the quality of life for residents and visitors to Peacehaven	☒
6.5 Supporting residents in need	☐
6.6 Valuing the environment	☒
6.7 Which business plan item(s) does the recommendation relate to? Creating a Business Plan for this committee	

7. Appendices

Terms of Reference

Making decisions in line with Council policies, in particular those relating to climate change, biodiversity, nature recovery, and to be proactive in ensuring that the Council's carbon neutral targets are met by 2030.

Reviewing, advising on, and proposing changes to policies and procedures relating to the environmental management and sustainability practices of the Council.

Submitting proposals for the following financial year to the Council not later than the end of October each year including any proposals for revising the forecast.

Scheme of Delegation

- To **advise** on environmental and sustainability implications of tenders and contracts in accordance with PTC's Financial Regulations and with reference to its Policy and Finance Committee.
 - To **report** progress against the Council's Community & Business Plans.
 - To **recommend** actions to promote nature recovery and biodiversity.
 - To **recommend** targets relating to climate change and sustainability for Council to consider.
 - To **develop** action plans for environmental and sustainability management.
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- To **report** progress towards the Council's agreed targets for climate change and sustainability
- To **prepare** annual Committee budget estimates for review by the Policy and Finance Committee
- To **manage** and **monitor** at each committee meeting the income and expenditure against the approved budget for the committee.
- To **consider** the environmental implications of Committee decisions, including for biodiversity nature recovery.
- To **submit** reports with recommendations to other Standing Committees for items under their delegated authority, including the bi-annual climate event.



Committee:	Environment & Sustainability	Agenda Item:	ES46
Meeting date:	3 rd November 2026	Authors:	Cllr Sue Griffiths
Subject:	Information and tools to enable the committee		
Purpose:	To provide the committee with the tools needed to fulfil our Terms of Reference		

Recommendation(s):

That Committee recommends to Policy and Finance that expert knowledge be sought to provide a baseline figure for the carbon footprint of Peacehaven Town Council to be funded through the Professional Fees Reserve.
That a mechanism is found for monitoring the carbon footprint of all areas of Council work.
That Committee recommends to the Personnel Committee that a member of staff be given the role of working towards our goal of net-zero carbon.

1. Background

Council declared a Climate Emergency and agreed to reduce Council's carbon footprint to net zero by 2030. It is impossible to measure any progress made because we don't have a baseline figure to measure progress from. Over the years, Council has ignored the need for a baseline figure because it is too difficult or would cost too much, even though there was a budget created when we agreed to the Climate Emergency motion, which I believe has now been spent. We don't have the expertise within Peacehaven Town Council and therefore need to find expertise outside of Council to provide us with a baseline figure. The cost of this could be covered by the reserve fund for professionals.

As a committee, we can monitor our own behaviour towards the environment and sustainability, but we have no mechanism to monitor what is happening in other areas of Council Work. An attempt was made by creating an impact form for each report, but this is rarely filled in. Once again, we have no way of monitoring what is going on in the Council as a whole. There is no realistic way of monitoring whether we can reach net zero by 2030, and it would not be good practice to change this date without having evidence.

2. Options for Council

To agree the recommendations above.

To not agree the recommendations above.

3. Reason for recommendation

To make Council's journey towards net zero transparent and enable measurement of progress.

4. Expected benefits

Monitoring to find out our real position instead of guesswork

5. Implications

5.1 Legal	
5.2 Risks	
5.3 Financial	Staff time. Funding from Reserves
5.4 Time scales	
5.5 Stakeholders & Social Value	
5.6 Contracts	
5.7 Climate & Sustainability	To enable proper monitoring, accurate outputs, and improvements.
5.8 Crime & Disorder	
5.9 Health & Safety	
5.10 Biodiversity	Proper monitoring.
5.11 Privacy Impact	
5.12 Equality & Diversity	

6. Values & priorities alignment

Which of the Core Values does the recommendation demonstrate?	
6.1 Empowering and supporting the community	☐
6.2 Growing the economy sustainably	☒
6.3 Helping children and young people	☐
6.4 Improving the quality of life for residents and visitors to Peacehaven	☒
6.5 Supporting residents in need	☐
6.6 Valuing the environment	☒

6.7 Which business plan item(s) does the recommendation relate to? We have no business plan yet.
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7. Appendices