

Subject:	Rewilding Waterhall Golf Course		
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Figure 1: Waterhall from 19 Acres

1 OVERVIEW:

- 1.1 CityParks has a solid track record providing Conservation Grazing over the last 10 years and are well placed to deliver conservation management at Waterhall Golf Course (WGC)
- 1.2 An independent Ecological Survey carried out over the summer identifies that
 - “Waterhall supports a high diversity of wildflowers including many specialist chalk grassland species. The habitat quality varies across the site with one exceptional area south of the clubhouse already meeting all the criteria for classification as species-rich chalk grassland. As a whole, the site was found to have high potential for restoration.”

- “Waterhall is highly suitable for chalk grassland restoration through a sensitive and sympathetic rewilding strategy which recognises not just its biodiversity potential but also its high levels of community use, exceptional landscape value and importance for carbon storage”.
- 1.3 It is proposed that the rewilding is managed as one compartment using “naturalistic management”, to mimic natural processes as far as is practical under the project title Wilding Waterhall.
 - 1.4 Adjacent areas already managed by CityParks as part of the Conservation Grazing project should be incorporated giving a total area of approximately 90Ha.
 - 1.5 Grazing animals will be introduced to live with minimum intervention allowing them to express more natural behaviour and provide more natural habitat drivers.
 - 1.6 CityParks experience with conservation grazing shows that it should be possible to manage the land on a cost neutral basis using Countryside Stewardship although some additional funding may be necessary for initial capital works such as perimeter fencing, which is already held in the Downland Initiative budget.
 - 1.7 The next submission date for Countryside Stewardship is May 2021 with a start date of January 2022. Some temporary grazing has been arranged for this autumn and some other preparatory work may be possible leading up to January 2022.
 - 1.8 The project should also attract additional funding which will allow a much enhanced project to be completed
 - 1.8.1 A draft project proposal has already been put to the Changing Chalk project board (necessary to meet the deadline for being included). This is a National Heritage Lottery Fund partnership project led by the National Trust that is currently in its development phase so stands a good chance of success
 - 1.8.2 The South Downs National Park have suggested bidding into their Landscape & Biodiversity Programme. The form of this bid will depend on the outcome of the Changing Chalk bid
 - 1.9 It also provides an excellent opportunity for wider working with Biosphere and Changing Chalk partners
 - 1.9.1 Sussex University are interested in doing research into the levels of carbon sequestration under pasture management.
 - 1.9.2 Kew Gardens can provide expertise in using existing wild flower areas to enhance ecologically poorer areas of the golf course
 - 1.9.3 There is potential to work with the National Trust in providing a wider public experience by linking with their Devils Dyke and Saddlescombe properties.
 - 1.10 CityParks have extensive experience at engaging volunteers and envisage creation of a dedicated volunteer group as well as drawing in volunteers from existing groups



Figure 2 New Forest Pony Grazing at 19 acres, Waterhall

- 1.11 It will also provide additional benefits that are not immediately measurable financially for example:
 - Improvements in biodiversity
 - Improvements in water quality
 - Carbon sequestration
 - An increase in the number and diversity of people utilising the space
 - An opportunity to engage people with nature and promote the objectives of the Biosphere
 - Improvements in public health leading to an overall reduction in health spending in the city
- 1.12 This proposal would contribute to council policy by:
 - taking action to redress biodiversity loss
 - taking action to limit climate change
 - supporting the objectives of the Biosphere.
- 1.13 It would contribute to government policy by:
 - contributing to the 25 year plan for wildlife
 - improving drinking water quality in the vulnerable Brighton aquifer
 - providing better access to natural landscapes.
- 1.14 The potential use of buildings on the site as part of the rewilding project, will be considered in conjunction with the outcome of the marketing of the buildings.

2 ANALYSIS & CONSIDERATION OF NATURALISTIC MANAGEMENT OPTIONS:

- 2.1 Naturalistic management allows natural processes to replace human management of sites where possible. It forgoes direct control of landscapes to achieve specific targets in favour of reaping the diverse benefits of allowing nature to act more freely. The benefits of naturalistic management can include biodiversity restoration and conservation, flood mitigation, carbon storage and sequestration, and space for recreation and physical and mental health recovery.
- 2.2 Naturalistic management can be implemented in a variety of ways, allowing management strategies to be tailored to specific site conditions and contexts.
 - 2.2.1 In its most ambitious form, true rewilding would see the return of all the species that are missing due to human influence. In South-East England this would include species from pine marten and wild cats to straight-tusked elephants, hippopotamus, and wolves. A fully restored animal community living in a large wilderness would deliver the important natural processes that created the conditions for all current native biodiversity to evolve. These conditions were last present in The Last Interglacial, ~125,000 years ago, when humans were absent from Britain and the climate was similar to today. This period offers a useful insight into what natural conditions would be today in the absence of people. Fossil beetles suggest abundant large herbivores living in a landscape of mixed vegetation structure consisting open grassland, shrub, savannah, and woodland. These are the conditions that are most likely to support the widest range of native biodiversity today. However, in the context of WGC this form of rewilding is not possible because:
 - some key species are extinct
 - some species would be too dangerous in an urban setting
 - some species require much more space than is available.

2.2.2 As a Passive strategy:

Management could be minimised or removed entirely and nature allowed to develop without any prior ecological remediation or ongoing management. The likely outcome of this would be similar to the land abandoned on the South Downs last century, the development of a relatively even aged scrub. While this might benefit a small number of species, it would be with the loss of many others and at the opportunity



Figure 3: Dense even aged scrub

cost of creating a more diverse vegetation structure that includes species rich grassland and scrub. “Total abandonment can produce a ‘succession paradox’, whereby plant diversity actually declines as scrub and woodland develop....Any rewilding scenario should ideally deliver enough grazing and disturbance to support all species”, Plantlifeⁱ

This form of rewilding would probably result in a loss of biodiversity as well as decreasing public access and loss of traditional open downland as dense scrub takes over.

2.2.3 An Active strategy:

Alternatively, some ecological remediation could be implemented in addition to reducing management. This could include ecological restoration (e.g. seeding native plant species, planting under-represented tree species) and species introduction to return some missing animals. We know that a natural landscape would have contained many species that are now absent, including large herbivores which can play a particularly important role. Therefore, naturalistic management at WGC could include the use of domestic herbivores in place of their wild ancestors, with humans taking the place of predators to control overall numbers and taking the place of the really big animals that cannot be reintroduced. By restoring large herbivores in a way that mimics natural herbivore communities, they could be instrumental in creating a diverse vegetation structure. Use of GPS collars will allow a seasonal pattern of grazing to be established creating a more varied pattern of grazing akin to larger systems like the Serengeti which in turn will result in greater species diversity. This will result in areas of grassland, scrub and woodland which develop over many years to contain a wide range of species and ages of growth, enhancing biodiversity and making them more resilient to disease and storm damage.

This is therefore the preferred option that is proposed for WGC as it has the greatest potential for increasing biodiversity as well as increasing public access and maintaining traditional open downland.

- 2.3 The council currently has a Conservation Grazing Project covering approximately 110Ha, largely using sheep but also using ponies (adjacent to WGC). This could be extended and adapted to include the naturalistic management of the golf course.



Figure 4: Crab Spider on Marjoram in grazed grassland

- 2.4 In order to mimic natural herbivory as far as possible grazers (e.g. horse, cattle), browsers (e.g. roe deer), and rooters (wild boar/pigs) should be represented where practical. Grazers, browsers and rooters would create a functionally diverse community of herbivores. Ancient breeds are generally preferable as these are better able to survive with little husbandry. This also helps conserve what are often rare breeds in themselves.
- 2.5 Naturalistic management is a better option than just planting trees. Planting trees creates a plantation not a woodland. While a plantation may sequester carbon quickly it is susceptible to disease (much of the ash planted after the storm in 1987 is now dying from ash dieback and the sequestered carbon being released) or wind throw, does not provide species diversity and incurs higher maintenance costs. A woodland arising from naturalistic management is diverse in age and species giving better long term carbon sequestration, also addressing the biodiversity emergency as well as the climate emergency. Areas of grassland also sequester carbon in the soil and add further to the species diversity. Converting grassland to woodland can result in a loss of carbon sequestrationⁱⁱ. However it may be beneficial to do some tree planting (using appropriate locally-native stock) in the preparation stage of the proposal to ensure that a diverse range of seed is available as the landscape develops.
- 2.6 A baseline study undertaken by an independent Ecologist this summer showed that
 - 2.6.1 “Waterhall supports a high diversity of wildflowers including many specialist chalk grassland species. The habitat quality varies across the site with one exceptional area south of the clubhouse already meeting all the criteria for classification as species-rich chalk grassland. As a whole, the site was found to have high potential for restoration.”
 - 2.6.2 “Waterhall is highly suitable for chalk grassland restoration through a sensitive and sympathetic rewilding strategy which recognises not just its biodiversity potential but also its high levels of community use, exceptional landscape value and importance for carbon storage.”
 - 2.6.3 “a simple restoration strategy is proposed based on the reintroduction of grazing livestock, the traditional management regime on the Downs”

3 BIOSPHERE IMPLICATIONS:

- 3.1 The Living Coast UNESCO world Biosphere region of Brighton & Lewes Downs designated due to its rich but rare chalk grassland core, has three objectives:
 - To conserve and enhance nature;
 - Support sustainable human development;
 - Promote environmental awareness, knowledge, learning and engagement.
- 3.2 This proposal could significantly contribute to all of these objectives, for example by protecting and enhancing already established habitats and strengthening their resilience; achieving biodiversity net gain; reducing negative environmental impacts associated with current operations (such as air emissions from grass cutting plant; water and soil degradation from chemical pesticide and fertiliser inputs; biodiversity reductions from herbicide and pesticide usage). Equally the proposal would present a major opportunity to develop these areas for more sustainable and equitable usage, by creating wider, free public access to external, natural spaces enabling both public health benefits to local communities and wider

residents of Brighton & Hove, and also increased learning opportunities both formal and informal.

- 3.3 Naturalistic Management of the golf course could be beneficial to the Biosphere partnership in providing opportunities for research and monitoring projects through our knowledge partnership with the Universities, for example, the current Wild Adventures Heritage Lottery Fund project bid led by University of Sussex and supported by The Living Coast Biosphere, specifically based on engaging young people with rewilding opportunities in Sussex.
- 3.4 Naturalistic Management would also enable a greater access to outdoor classroom opportunities, enhancing the ongoing delivery of the Brighton and Hove Environmental Education programme funded by the Property and Design team, and the Our Water Matters schools programme based on the water cycle processes of our chalk downland.
- 3.5 This proposal would provide a fantastic platform to demonstrate to residents of Brighton & Hove that the Council is taking seriously the current climate and biodiversity emergency, and taking visible and appropriate action to address these issues where and when opportunities arise.
- 3.6 As a Biosphere project there will be a strong public engagement element as part of the core objectives: environmental awareness, knowledge, learning and engagement.
- 3.7 Depending on the differing funding streams it is hoped that there would be opportunities for open public access and engagement, guided tours and school visits as well as volunteering opportunities monitoring the wildlife and livestock.

4 PUBLIC HEALTH IMPLICATIONS:

- 4.1 The golf course lies within the South Downs National Park which was designated following a review of the interpretation of the statutory criteria for designation of national parks, instigated by the then Environment Minister Michael Meacher MP primarily to take into account the modern needs for open-air recreation close to where people live. This proposal will significantly increase this provision close to the largest conurbation adjacent to the National Park.
- 4.2 There is a growing body of evidence to show that time spent in open green spaces provides significant benefits to physical, mental and social health, disease preventionⁱⁱⁱ mood and self esteem^{iv}.
- 4.3 Public Health England and National Parks England drew up an accord in September 2017 outlining their shared commitment to work towards achieving a broad range of public health outcomes by utilising the assets of our National Parks to provide opportunities for people to improve their overall wellbeing and specifically physical and mental health^v. The accord outlines how these benefits can be reaped by fully engaging with people from disadvantaged communities, providing volunteering and economic opportunities, tackling social isolation, providing physical activity and learning opportunities (including work with schools) and biodiversity and climate protection. The raft of benefits and action points outlined in the accord could be used to provide a framework for the revitalisation of the golf course land.
- 4.4 Access to good quality green open spaces has a disproportionately positive effect on the least well off in society and can be used to address health inequalities^{vi}. Greenspace also helps to create healthy and resilient communities and this could be utilised very effectively through managing this site for wildlife. As childhood

obesity continues to be an issue, and many children in the city are not achieving the recommended amount of physical activity each day; the provision of more accessible green spaces also creates the opportunity for learning and play outdoors. This is a position already agreed in Scotland which produced a National Outdoor Play Position Statement in 2018^{vii}.

- 4.5 Finally, there is strong evidence that the public demand for access to green spaces and outdoor participation opportunities is significant. Sport England figures^{viii} showed that 8.9m people nationally are already active outdoors but 2.8m want to do more and 18.2m of inactive people would like to participate in or re-engage with outdoor activities in the next 12 months.

5 COMMUNITY ENGAGEMENT & CONSULTATION:

- 5.1 Engagement regarding the council's conservation grazing project has taken place through public consultations on several sites (Wild Park, Ladies Mile, Whitehawk Hill) while not being for rewilding per-se, each of these consultations have shown support for the reintroduction of grazing animals for conservation. While there has always been a minority opposed to the reintroduction of livestock, experience has shown that this is minimised as people get used to the grazing and can understand, appreciate and enjoy its beneficial effects.

- 5.2 Further engagement opportunities could involve the provision of interpretation, outdoor classrooms, guided walks and "safaris" which would support the aims of the Living Coast Biosphere. This would be greatly enhanced by the appointment of an Education ranger, subject to external funding

- 5.3 Where management is needed to create a more naturalistic habitat, such as control of invasive species, thinning dense scrub, tree planting etc., this can be done by involving volunteers allowing the community to become directly involved.

- 5.4 The Food Partnership have submitted a proposal to the Changing Chalk partnership to develop the existing Sheep Share project that markets sustainably produced meat sourced from our conservation grazing project sites. This could help publicise this proposed rewilding work through sustainable meat sales, as well as highlighting the difference between meat produced in a sustainable way as opposed to more conventional farming practises.

- 5.5 There is strong support from partnership organisations including The South Downs National Park, Natural England, The Sussex Wildlife Trust, The National Trust, Sussex University, The Living Coast, The Aquifer Project (an £800,000 partnership water catchment initiative involving the Environment Agency, Natural England, Southern Water, the South Downs National Park and Brighton & Hove City Council) and the Brighton and Hove Food Partnership.

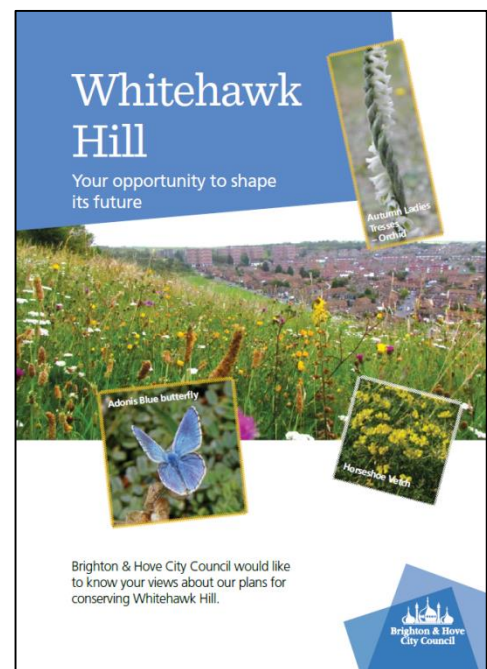


Figure 5: Whitehawk Hill Consultation

6 FINANCIAL & OTHER IMPLICATIONS

- 6.1 The council has an existing Conservation Grazing Project funded through the government's Higher Level Stewardship (HLS) scheme. Experience from the Conservation Grazing Project shows that the council could fund a basic rewilding project from a successful bid for this funding (now called Countryside Stewardship) with limited cost to the council other than officer time.
- 6.2 However the council has the opportunity to bid into several other funding schemes which would allow a more ambitious project. Subject to the success of these bids the projected expenditure over 5 years is estimated to be £467k and the projected income is estimated to be £492k. This includes
 - 6.2.1 £146k from Countryside Stewardship and Basic Farm Payment
 - 6.2.2 £77k from the South Downs National Park Landscape & Biodiversity Programme
 - 6.2.3 £232k from Changing Chalk NHLF bid
 - 6.2.4 £37k from S106 funding
- 6.3 Over the 5 years a surplus of £25k is projected
- 6.4 In addition the council may also be able to bid into the governments recently announced Green Recovery Challenge Fund or the National Lottery Climate Action Fund (which is aimed at projects delivering community-led climate action, including protecting and regenerating spaces and habitats leading to a deeper understanding of the landscape).
- 6.5 The cost of grazing is estimated from the current cost to graze 19 acres. The grazing contract is due for renewal so the actual cost will depend on the outcome of the tender process. With an increase in area to be grazed it is hoped that there will be some savings of scale
- 6.6 The accommodation required to facilitate this proposal will be reviewed alongside the marketing exercise for the buildings to enable the required storage and potential welfare/office space.
- 6.7 Impact on CityParks officer time. The ranger service has been working to become more efficient in how the conservation grazing project is delivered and should have freed up sufficient capacity to undertake this project by the project start date. This has been done by
 - 6.7.1 Erecting permanent fencing such as at Sheepcote. This greatly reduces the amount of time needed to set up grazing compartments and also increases security for the livestock.
 - 6.7.2 Providing a permanent water such as at 19 Acres. Where there is no water supply troughs are filled from a bowser, in warm weather where stock numbers are high this can involve daily trips. Permanent supplies not only reduce officer time they also reduce the carbon cost as regular journeys can be avoided
 - 6.7.3 Increasing use of more highly trained volunteers. In addition to using volunteers to check on sheep welfare we have begun to use volunteers to help set up grazing compartments and move sheep thus saving officer time and engaging more fully with local communities

7 EQUALITIES IMPLICATIONS:

- 7.1 This proposal would open the site for increased public access. School visits could be targeted to less well-off communities, which is a South Downs National Park priority for which they currently provide a travel grant^{ix}. Educational and access improvements would engage with a wider demographic than currently uses the site and initiatives could contribute to the National Parks Association goal of "one

night under the stars for all children” promoted by Julian Glover in his report on the state of the nation’s national parks^x and endorsed by the Environment Secretary.

8 SUSTAINABILITY IMPLICATIONS:

- 8.1 This proposal would provide multiple environmental benefits, helping to mitigate against the climate and biodiversity emergency.
- 8.2 DEFRA are currently considering the future direction of agri-environment funding and the Government have stated that they wish to move it towards public payment for public good so there is an underlying confidence that the long term future of the proposal would be secure.
- 8.3 This proposal would help achieve the Council’s aim to be carbon neutral by 2030, by reducing chemical and material inputs compared with current practice, enabling the recovery, protection and enhancement of established grassland habitat as a carbon sink; providing opportunities for biodiversity net gain, and providing environmental education and engagement opportunities. Restoring some habitats such as grasslands can help mitigate the causes of climate change by directly reducing greenhouse gas emissions, safeguarding carbon stores and in some cases re-starting sequestration. The sustainable management of habitats important for carbon storage therefore contributes to meeting targets for GHG emission reductions, including the carbon budgets set by the UK Climate Change Act. Grassland soils have the highest carbon stock of any UK broad habitat, with the species composition of grasslands influencing the amount of carbon in the soil. High-diversity grasslands store more soil carbon than monocultures, with legumes being the main contributors. While planting woodland can lock up carbon, so can restoring grassland. Research by Natural England shows that restoring unimproved grassland results in a net removal of 4.03 tCO₂-e per ha per year as opposed to afforesting it which only gives 0.37 tCO₂-e per ha per year^{xi}. This is largely due to the carbon locked up in the soils which are not disturbed through grassland restoration.
- 8.4 The rewilding proposal would support the Council’s Circular Economy principles by utilising some existing buildings, structures and services, prolonging the in use phase of carbon and materials already embedded within these spaces. Naturalistic land management with educational and leisure opportunities would present a low impact re-use of the space and facilities.

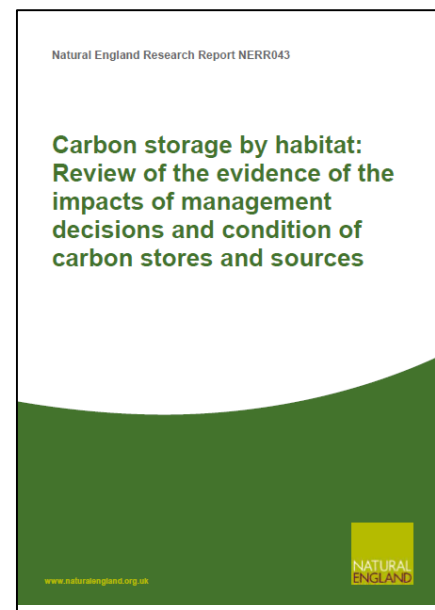


Figure 6: Carbon Storage Study

9 ANY OTHER SIGNIFICANT IMPLICATIONS:

Risk and Opportunity Management Implications:

- 9.1 If the site is rewilded in house the financial risk will fall on the council. However the financial risk is low as it is expected that the proposal should be funded from the

current system of agri-environment payments, therefore requiring little financial outlay from the council. There is some risk that the council may receive a financial penalty if it does not keep to the terms of its Countryside Stewardship agreement but complying with the management requirements should mitigate against this. This small risk should be considered against the opportunities to maximise the benefits from a positive change in the management of this site. The potential from increased and more diverse uses should not be underestimated, with a variety of income streams possible.

10 POLICY/ BACKGROUND INFORMATION:

Current and emerging policy provides a highly encouraging context for this 'rewilding' proposal. The following list some of the key drivers in this area:

10.1 On 13 December 2018 Brighton & Hove City Council

- (1) Declared its recognition of global climate and biodiversity emergencies;
- (2) Requested the Policy, Resources & Growth Committee to:

- 'consider how the Council can strengthen local protection and enhancement of species, habitats and ecosystems services under available powers'.

This proposal would allow the council to move towards these goals.

10.2 The City Downland Estate Plan

The council produced a downland initiative in 2006 to inform the way its downland estate was managed. This is now in the process of being updated to produce a City Downland Estate Plan. A draft vision for the plan, the result of officer workshops, include the following notes:

- Improving wildlife biodiversity across the Estate was a key element of the Downland Initiative and included proposals for working with Natural England to carry out habitat restoration. That initiative has not been as successful as first hoped, due to a number of factors including constraints on funding, and in the absence of enhanced funding being available, tenant farmers have largely delivered the minimum requirements to access funding through Entry Level or Higher Level Stewardship schemes;
- However, improving biodiversity across the Estate is something that those attending the workshop are strongly in favour of, and brings with it an opportunity to deliver a number of other objectives. A more biodiverse ecosystem will help to encourage more visits and increase 'dwell time' and this will help to deliver health and wellbeing objectives;
- Some of the lack of value or even awareness of the Downland Estate amongst residents might be attributed to the relatively poor levels of accessibility to the landscape.
- With some exceptions, most people attending the workshops felt that encouraging greater access to the Estate – including by sustainable modes of transport including public transport - should be the priority.

This rewilding proposal would address these emerging themes, in particular what is seen as one of the weaknesses of the current Downland Initiative: improving the wildlife and biodiversity of a large tract of land. By providing open public access and educational opportunities it would also help increase public awareness of the public estate and start to tap some of the potential of the landscape.

10.3 There are several species and habitats identified in the Brighton & Hove Local Biodiversity Action Plan^{xii} which will benefit from the proposal.

Habitats that would benefit include:

- Lowland Calcareous grassland
- Lowland Mixed Deciduous Woodland.

Species include:

- Hornet Robberfly, which requires a ready supply of livestock dung (ponies or cattle) from late June to the end of October;
- The Brown-banded Carder Bee, which requires large flower-rich sites;
- Dingy Skipper, which occur in open, sunny habitats such as chalk downland, where its main food plant, Bird's-foot-trefoil grow;
- Adder. In Brighton and Hove the adder is confined to the larger blocks of open, semi-natural grassland and scrub; and
- Dormice, which require a diverse, continuous shrub layer with a variety of food sources to enable them to feed throughout their active period.



Figure 7: Dormouse

Dormice are already present on the site and S106 funding has been provided to enhance areas for them in mitigation for the Toad Hole Valley Development

10.4 WGC is part of The Living Coast: Brighton & Lewes Downs UNESCO World Biosphere region, designated to be an exemplar of sustainable development and delivering environmental engagement and education, sustainable socio economic development and nature conservation with the focus of connecting people and nature to inspire a positive future, today.

The proposal could create a flagship project to build on what has already been achieved through the Biosphere partnership and enable greater opportunities for public engagement with and awareness of the natural environment, as well as Council led partnerships and programmes seeking to address the climate and biodiversity emergencies. It would enable stronger partnership working with and access to key stakeholders with current expertise in this area, such as South Downs National Park, Sussex Wildlife Trust, the National Trust and University of Sussex (specifically Sussex Sustainability Research Programme that has diverse expertise and could help guide the project).

10.5 The Downs around Brighton & Hove were managed for centuries by grazing which has given them their open aspect with far reaching views classified as “Open Downs” in the National Park’s South Downs Integrated Landscape Character Assessment^{xiii}. This recommends the following Broad Management Objective and Landscape Guidelines to maintain this character:

‘The overall management objective should be to conserve the vast open rolling upland character of the Open Downs and the strong sense of remoteness and tranquillity.

- Maintain and increase the species diversity of areas of semi-improved grassland, which act as a reservoir for more common chalk downland species.
- Consider removal of areas of linear scrub along fence lines where the fence is being removed to minimise conflict with the open and smoothly rolling character of the landscape.
- Protect and continue to manage (graze) the existing chalk grassland and chalk heath sites.
- Protect and manage all existing archaeological earthwork sites for their contribution to understanding and recognising the historic continuity in the landscape.
- Manage areas of scrub on steeper slopes to vary the age and species structure and to enhance the distinctive landform.
- Maintain the essentially open undeveloped character. Opportunities for built development are severely restricted in this remote and tranquil landscape.
- Conserve the open skylines that are particularly sensitive to any type of built development. The crest of the northern escarpment is especially important in relation to long views from the low lying landscape beyond.
- Consider opportunities for planting to soften the existing urban fringes. Planting should recognise and reveal the subtleties in the landscape and avoid a standardised approach. Woodland is usually confined to lower slopes while isolated woodland clumps are features of some ridgetops.
- Manage recreational use and ensure recreational facilities and signage are well integrated into the landscape by means of siting, materials and design.

The management option recommended in this proposal would make a positive contribution to most of those objectives

10.6 The government's 25 year Environment Plan^{xiv} (on which the new Environment Act has been underpinned) published on 11th January 2018 sets out the UK's ambition to develop a growing and resilient network of land, water and sea that is richer in plants and wildlife by:

- creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits;
- making sure that there are high quality, accessible, natural spaces close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their health and wellbeing;
- Taking action to recover threatened, iconic or economically important species and, where possible, to prevent human-induced extinction or loss of threatened species;
- Establishing a Nature Recovery Network.

The concept for the Nature Recovery Network is simple. Our existing protected sites constitute our best areas for wildlife and provide many other economic and social benefits. They should form the core of any future network.



Figure 8: Cattle grazing at Knepp

However, for nature to recover we have to also look beyond protected sites and take action to extend and link our existing sites, both to support wildlife and to recover the range of economic and social benefits that nature provides.

It recognises the rewilding at Knepp Estate specifically as an interesting example of restoration to recover nature and this proposal would make a big contribution to these goals.

- 10.7 In Making Space for Nature: A review of England's Wildlife Sites and Ecological Network, published in 2010, Professor Sir John Lawton stated "to make space for nature we need more, bigger, better and joined up sites to create a sustainable, resilient and more effective ecological network for England". This proposal provides a bigger, better solution that should be sustainable and resilient.
- 10.8 The governments Landscapes review: National Parks and AONBs (Sept 2019) sets out several proposals that this rewilding bid would contribute to, in particular:
- Proposal 7: A stronger mission to connect all people with our national landscapes, supported and held to account by the new National Landscapes Service
 - Proposal 8: A night under the stars in a national landscape for every child
 - Proposal 10: Landscapes that cater for and improve the nation's health and wellbeing
 - Proposal 11: Expanding volunteering in our national landscapes
 - Proposal 12: Better information and signs to guide visitors
 - Proposal 14: National landscapes supported to become leaders in sustainable tourism
 - Proposal 16: Consider expanding open access rights in national landscapes
 - Proposal 21: Welcoming new landscape approaches in cities and the coast, and a city park competition.
- 10.9 Designations:
- The golf course lies within the South Downs National Park;
 - The golf course includes areas identified for woodland improvement by the Forestry Commission.
 - It is a Local Wildlife Site.
- 10.10 Water Quality
- Waterhall is in Natural England's Water Quality Priority Area;
 - It is in the Environment Agency's Nitrate Vulnerable Zone;
 - It has areas in all 3 Source Protection Zones (SPZs) designated by the Environment Agency (Inner Protection Zone, Outer protection Zone and Total Catchment zone);
 - It comes within Natural England's Flood Risk Management priority zone;
 - Brighton & Hove Council is a lead partner in TAP (The Aquifer Project), whose project aim is to protect and improve the quality of groundwater in the Brighton Chalk Block as a valuable natural resource for public water supply.
 - The purpose of the original purchasing of much of the city's Downland estate was to protect the recharge zone of the chalk aquifer from where the city's drinking water is sourced.

The proposal will help alleviate flood risk by increasing rainwater holdup and percolation. It increases ground and surface water quality through reducing use of pesticides and fertilisers

- 10.11 The planning designation for the site is D2 which is the use for entertainment and leisure purposes. Introducing grazing would probably be seen as agricultural activity, enabling funding claims but planning permission may be needed. Planning permission may also be needed for any change of use with the buildings, depending on that use. The course is located within the South Downs National Park who are the planning authority who have expressed support for the proposal so any planning issues should be resolvable as these proposals are in accord with the twin purposes of National Parks (conserving natural beauty and providing opportunities for understanding and enjoyment).

11 CONCLUSION:

- 11.1 The rewilding proposal offers the opportunity to follow in the pioneering footsteps of the city's forefathers who purchased the land the golf course was built on and much of the surrounding land, as the only way to control development prior to the Town and Country Planning Act coming into power in 1947, as well as protecting the population's vital drinking water supply and providing for public access.
- 11.2 The recommendation is to pursue the option of naturalistic management.
- 11.3 This sits well with the Changing Chalk HLF funding bid that the National Trust are leading on which is now in its development phase. A pilot proposal has been prepared and the National Trust have indicated that they are keen to include it in the final bid.

12 SUPPORTING DOCUMENTATION:

Background Documents

1. Wilding by Isabella Tree, The story of the 'Knepp experiment' to 2018, published by Pan Macmillan, ISBN 9781509805099

ⁱPlantlife, 2019, **Plantlife research shows the value – and vulnerability – of Britain's last remaining meadows** <https://www.plantlife.org.uk/uk/about-us/news/plantlife-research-shows-the-value-and-vulnerability-of-britains-last-remaining-meadows?fbclid=IwAR3voPeFtibQHNGy-OiPwEtW6V6Ey15frM9h0mRQxaEpc5nZaANdRJNrDRc>

ⁱⁱ ALONSO, I., WESTON, K., GREGG, R. & MORECROFT, M. 2012. **Carbon storage by habitat - Review of the evidence of the impacts of management decisions and condition on carbon stores and sources**. Natural England Research Reports, Number NERR043.

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