Dear Sirs

APPLICATION BY SUSSEX WILDLIFE TRUST (SWT) TO FENCE PART OF IPING AND TROTTON COMMONS
Ref: COM 749

I attach our parish council’s response to this application and a letter that we wrote to Sussex Wildlife Trust concerning gates for the disabled.

We would be grateful if you could please acknowledge receipt of this email.

Kind regards

Jane Crawford
Clerk
Stedham with Iping Parish Council

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APPLICATION BY SUSSEX WILDLIFE TRUST (SWT) TO FENCE PART OF IPING AND TROTTON COMMONS
Ref: COM 749

Stedham with Iping Parish Council has objections to the proposed fencing of part of Iping and Trotton Commons.

These commons in total cover an area of some 99 ha of registered common land and Open Access land, most of which is in our parish. They lie in the South Downs National Park and are part of the Iping and Stedham Commons Local Nature Reserve. They possess archaeological and historic sites from the Stone Age (5) and Bronze Age (9) that include many barrows as well as part of the Chichester to Silchester Roman Road. They are popular for recreation, walking and horse riding (particularly by children) as well as for many ecological pursuits including bird watching.

We object to this application to fence part of Iping and Trotton commons (78 ha) for the following reasons:

1. **Fencing within the common:**

   The proposed fencing is unable to follow the natural boundary of the Iping and Trotton commons because SWT has been unable to reach agreement to fence with their neighbouring landowners (Leconfield Estate, Cowdray Estate and other landowners at Trotton). The fence-line will therefore redefine and re-shape the commons with a contrived division that will create three different commons.

   The proposed fence is 4,300 metres long with nearly 40 gates. It will be visually unattractive and will divide an area of tumuli from the Roman Road and other tumuli which are all scheduled ancient monuments. No proposals have been put forward as to how the historic sites will be protected from grazing animals.

2. **Access:**

   Currently the commons can be accessed by a long road frontage on Elsted road, from the A272 and from Trotton without hindrance. The long fence will be a permanent impediment to access for walkers and riders and will change the ambience.

   The proposed fence has various gates, but because the field gates are padlocked, the bridle gates are not wide enough to accommodate two horses together which will be difficult for local children who currently ride on leading reins beside adults to access this common.

   Disabled people using mobility scooters are equally disadvantaged and we note that West Sussex County Council has not taken the Disability Discrimination Act 1995 into account when approving the planned gates across public rights of way. (Please see our attached letter to SWT dated 13 June 2014.)

3. **The scientific case for grazing:**

   Some 15 years ago, after appeal, SWT was permitted to fence Stedham Common, which lies adjacent to the east of Iping Common.
In the intervening period there have been additional academic studies of the effects of grazing on heathland species (Newton, et al 2014; Lake, et al 2001) which have concluded that although there are some beneficial effects of grazing, such as a decline in the vertical structure of ericaceous shrubs, gorse and grass tussocks, this can have a detrimental effect on the population of heathland reptiles, and also on some bird species such as the rare Dartford warbler, a native of our heathland commons, which depends on snow-covered gorse for its winter survival. The numbers of this bird in particular are reported to have declined during SWT’s tenure.

The more recent studies comparing the data relating to heathland management have found a lack of robust, high quality data from appropriately controlled investigations. The result is that managers of heathland reserves rely on anecdotal evidence without considering the results of meta-analysis to provide scientific weight to their conclusions.

From our experience of Stedham Common, its present condition seems mainly the result of human intervention: felling pine plantations, cutting birch saplings, poisoning bracken, mowing heather and creating bare patches rather than grazing. We believe the grazing may in fact have encouraged the spread of birch saplings.

We are not aware of any monitoring reports on the effects of fencing and grazing on Stedham Common, and no benefits or otherwise have been demonstrated to us. Before any permission is given for fencing Iping and Trotton Commons, SWT should undertake a systematic analysis with suitable controls of both the unfenced commons and the fenced Stedham Common. There is an imperative need for all of us to know whether fencing and grazing maintains or improves the ecological value of the commons at a species level and that the heathland management objectives are being met.

4. Bovine TB:

Five SWT cattle grazing Stedham Common for the winter of 2014/15 were slaughtered after one of them tested positive for Bovine TB, carrying the strain found in East Sussex where SWT have other cattle, although this animal had not been in East Sussex for approximately 6 years.

Up to this point West Sussex was one of the lowest risk areas for Bovine TB and cows were subjected to a rolling program of 4 yearly testing because of the very low incidence of Bovine TB.

Since the SWT infection a local farm has suffered TB reacting cattle which have been culled. Ongoing 6 monthly testing is in place and animals on farms adjacent to Stedham Common have not yet had a 100% clear test. Compulsory slaughter is ongoing. Other cattle owners within a three kilometre radius of Stedham Common now have to undergo TB tests if they wish to move their cattle. There are two other commons with similar restriction zones because the infected cow had also been grazing on them.

SWT has not made public any investigations they may have undertaken to find the cause of the TB outbreak or any plans to change their practice of moving cattle from site to site. Consequently, our Parish Council believes that until SWT produce a new and safe management plan for their cattle, further grazing should not be contemplated.

Our conclusion is for all the above reasons it is not to the benefit of the neighbourhood or in the public interest for the commons to be fenced.

Jane Crawford
Clerk to the Council
28 November 2015

Att: SIPC letter to SWT of 13/6/2014
Jane Willmott  
Sussex Wildlife Trust  

13 June 2014  

Dear Jane  

**Fencing Iping Common**  

Our Parish Council has discussed the siting of the gates on your plan of the proposed Iping Common fence and agreed that they seem to be in broadly in the correct positions.

However, we believe that as you will be fencing a local nature reserve in a National Park, you must consider disabled access as can be seen on the link below from which we quote:


“Access for the Disabled  
If you want to get out to enjoy the benefits of the countryside, being disabled shouldn’t be a barrier. This section outlines the responsibilities of different authorities for providing access to the outdoors for disabled people.

The Disability Discrimination Act (DDA) 1995 states that every provider of facilities and services has to improve access by making ‘reasonable adjustments’ to help disabled people. This means that local authorities must now take into account the needs of people with mobility problems when authorising the erection of stiles, gates or other work on footpaths or bridleways.

Now you can reasonably expect that manmade barriers, such as fences, steps and stiles or uneven surfaces, will not restrict your choice of places to visit.

The DDA also places a duty on public bodies to work with disabled people in the design and provision of services – and that includes rights of way and other routes.”

We, therefore, suggest that at least one gateway on the east and one on the west side of the common should be designed to enable disabled people using mobility scooters to access the common by themselves.

We would also ask you to consider modifying the gates on the east and west of Stedham Common on the viper trail to enable similar disabled access.

Yours sincerely

Jane Crawford  
Clerk to the Council