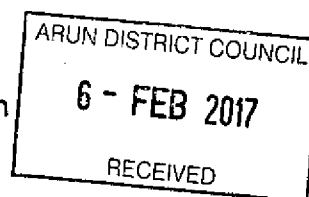


2 February 2017

Assistant Director of Planning & Economic Regeneration
Arun Civic Centre
Maltravers Road
LITTLEHAMPTON
BN17 5LF



22 Becton Lane
Barton on Sea
New Milton
BH25 7AA



Dear Sir/Madam

**ARUN DISTRICT COUNCIL
PLANNING APPLICATION - P/140/16/OUT**

I am writing to object to the proposals outlined in the above planning application.

Having been a resident of Selsey during the 1980s and working for West Sussex County Council as Site Manager for the Pagham Harbour Local Nature Reserve, I know the area very well and the importance of open fields to the north and east of the sea wall.

The area of land proposed for housing is part of the wider area away from the designated site boundaries which is used by waterfowl which breed, feed and roost in Pagham Harbour Local Nature Reserve.

The core area of tidal land, as well as areas surrounding this, is part of the Site of Special Scientific Interest, designated under the Wildlife and Countryside Act (1981) (as amended). This is also regarded as a site of international importance, being also designated a Special Protection Area (under the EU Habitats Directive) and Wetland of International Importance (Ramsar Site) in March 1988. I was present at the declaration in London (along with The Wash in Lincolnshire/Norfolk) at this time, feeling very proud that a site I had been part of, holding such a variety of wildlife, had been recognised internationally. I believe these designations are now under threat.

What is also vitally important to wildlife (particularly migratory and over-wintering waterfowl) are "buffer-zones". These are areas of land (usually farmland which remain undisturbed for a large proportion of the year) immediately outside the "core areas", which are vital for roosting and feeding when disturbance (human or otherwise eg pollution) threatens their well-being on the designated site.

Any housing development adjacent to, or within a few hundred meters of the area designated, will have a detrimental impact on the wildlife, for which the site is of International Importance. Pagham Harbour and the surrounding farmland are regarded as part of a European Marine Site. As such, Local Authorities need

to exercise their functions so as not to compromise the favourable condition of interest features in the long-term. Regulation 33 Advice from English Nature (now Natural England) in the past made special mention of disturbance to migratory birds. Under the Habitats Regulations it states that the Environment Agency will be required to undertake an appropriate assessment if significant effects are likely from such disturbance, because of increases in pressure from the public. This assessment is required to assess whether or not there is an adverse effect on the integrity of the site.

Grassland, which is a sub-feature of the designated site, and surrounding farmland "buffer-zones", is necessary to support migratory bird populations. These populations require a suitable area capable of supporting the intertidal habitats which they rely on for feeding and roosting. The most important features are:

1. Current extent of suitable feeding/roosting habitat, and
2. Minimal levels of disturbance

Some species, for which the site is designated, are **dependent** on non-intertidal habitat and feed and roost in marshy grassland and adjacent cultivated land. This is true of all estuaries around the country. Relevant authorities need to have regard to such adjacent European interests as they may be affected (almost certainly in this case) by activities taking place (increased levels of disturbance from adjacent housing) within or adjacent to the European Marine Site.

Any development places a strain on the local services. It is likely that without massive investment in water treatment facilities locally, there is a danger that the run-off from extra housing as well as higher volumes of effluent (treated or untreated through accidental spills etc), will impact on the water quality in the European Marine Site.

It is incumbent on the Local Planning Authority in exercising its functions, to ensure that its actions (ie giving the go-ahead to a development so near to a special site, which will have a detrimental effect on the wellbeing of internationally "protected" species) do not render the site and associated habitats in unfavourable condition.

Whilst I appreciate the requirement placed on Local Authorities by Government to build more houses, and maybe a "generous" landowner has offered what they may regard as land suitable for housing as opposed to productive agricultural land (and all its benefits to wildlife), just because it is available does not mean that it is suitable for development. There are many brown-field sites within Arun District Council's area of responsibility, as well as farmland away from rich wildlife habitats, far more suitable for development than land adjacent to the internationally designated Pagham Harbour Local Nature Reserve.

Yours faithfully

