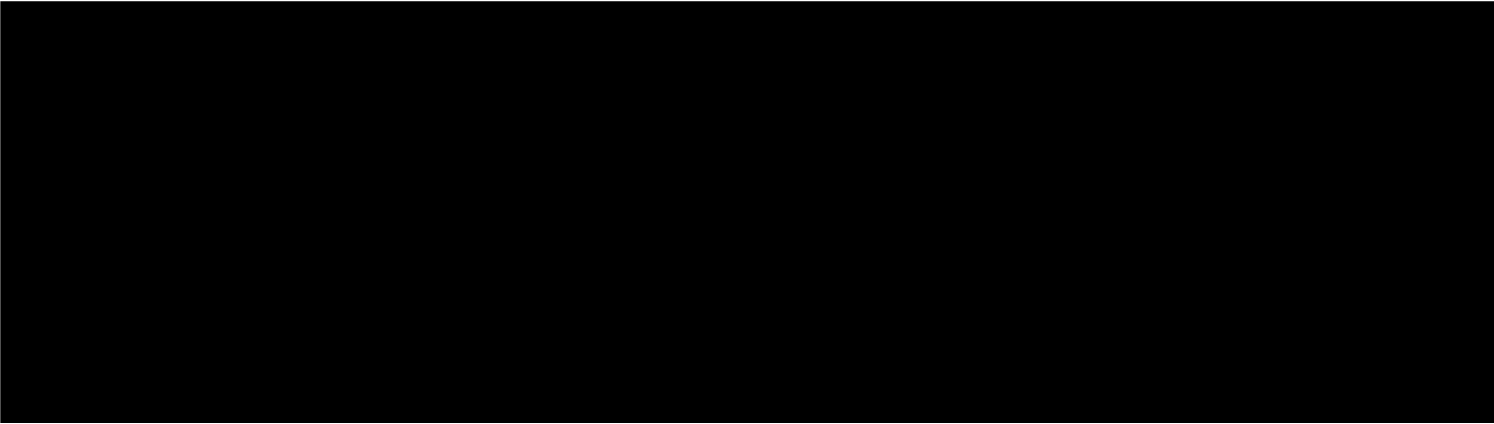
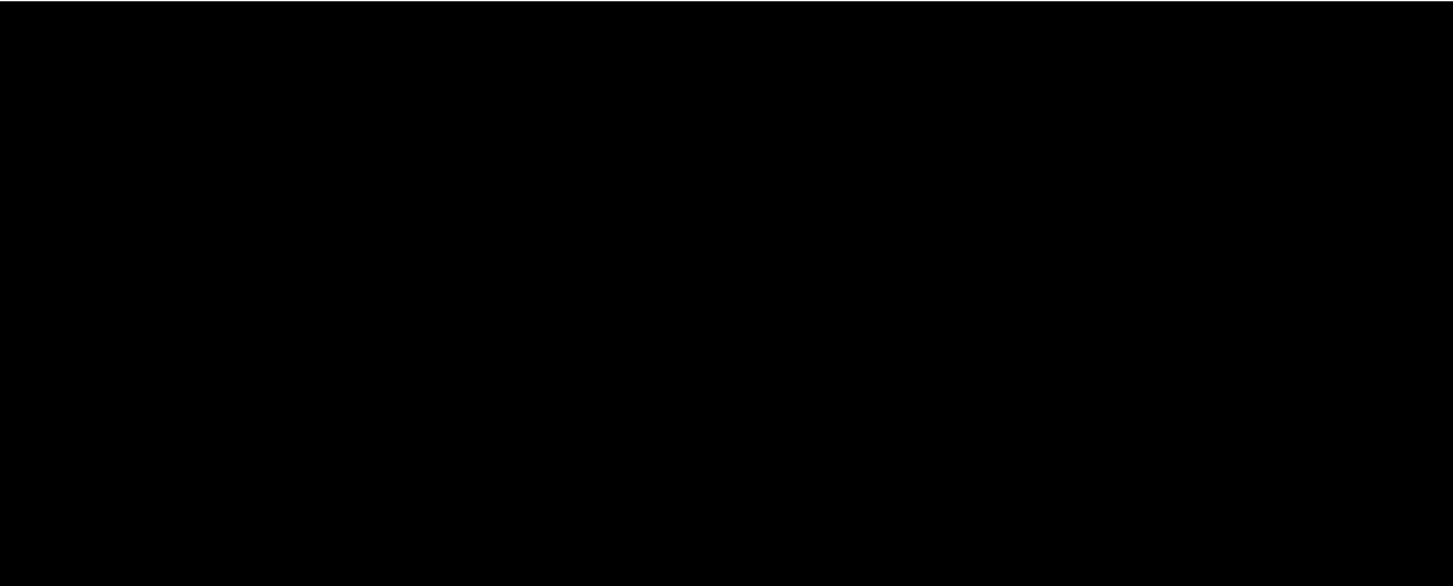






From: Richard Cowser [REDACTED]
Sent: 09 August 2017 16:20
To: David Innes
Subject: Formal SOS objection to P/140/16/OUT and P/25/17/OUT

Hello David,

Apologies it has taken longer to pull together than I thought, but attached is the SOS's formal objection to the above two planning applications. The attached document supersedes my e-mail of 20 July (which I see you have just posted on the Arun DC website).

With my 20 July e-mail I attached 19 new bird records. Reference section 8 in the attachment I will shortly be forwarding you some additional records to further emphasise how the site is being used by wintering birds.

I would be very happy to discuss our objections to these two planning applications.

Regards,

Richard



SUSSEX ORNITHOLOGICAL SOCIETY

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Beavers Brook,
The Thatchway,
Angmering,
West Sussex BN16 4HJ

9 August 2017

Mr David Innes,
Planning Department,
Arun District Council,
Maltravers Road,
Littlehampton,
West Sussex BN17 5LF

Dear David,

Objections to Planning Applications P/140/16/OUT and to P/25/17/OUT

- 1) The Sussex Ornithological Society (SOS) is the second largest county bird club in the UK with over 1900 members. Our database holds some three million records of birds recorded in Sussex and our Recorder and the SOS Records Committee are responsible for determining whether to accept or not accept those records of rare or scarce species that are not handled by the British Birds Records Committee. We publish the 250-page *Sussex Bird Report* each year and periodic avifauna (the last, the 614 page *The Birds of Sussex*, was published in 2014).
- 2) Previously Natural England has written to say that they would not be objecting to these two development proposals as they did not believe that they would affect wintering birds. However, local birders tell us that this area is used by wintering Brent Geese, Lapwings, Golden Plover, Curlew and Black-tailed Godwits. Up to the middle of this year the SOS records database (CoBRA2) had no records showing usage by these species at these two sites (so Natural England's conclusion that birds would not be affected was understandable). The lack of records is perhaps not surprising as the plots of these two sites lie behind tall hedges, and there are much easier places to see birds nearby, such as along the North Wall of the RSPB reserve, so it is a poorly watched area compared to the adjacent North Fields further to the west.
- 3) We have therefore gone to three sources to get records of these two sites being used by wintering birds.
 - a) Jim Weston has gone through the Selsey Blog (<http://selseybird.blogspot.com>) from its inception in March 2013 to the present day and has extracted 9 records from it which are relevant. Jim is

a local birder who for many years has conducted the monthly WeBS survey of wetland birds on the east side of Pagham Hbr (including this area).

- b) Owen Mitchell, who was a warden at Pagham Hbr from 2003 to 2009 when WSCC were managing the RSPB reserve, has gone through his own records and extracted a further 10 records which are relevant. Owen is one of the most respected birders in Sussex. He has birded this area for 40 years and is a founder and joint editor of the above mentioned blog.
- 4) We have taken the above information and created new records of these bird sightings, which have been entered to the SOS's CoBRA2 database. They have already been supplied to you.
- 5) In addition, acting on behalf of PAGAM, Jim Weston has surveyed 32 residents of the houses at the south end of Pagham Road (between Sea Lane and Church Way) which overlook the site of P/140/16/OUT. All these residents have lived there for between 5 and 47 years. 31 residents said that they see Brent Geese in the affected field annually and 27 estimate that they have seen flocks in excess of 1000 there on occasions. (See Appendix 1 for more details of this survey). It should be noted from the comments made how much these residents appreciate the fact that geese are regularly present in the fields of site P/140/16/OUT.
- 6) Bird records are being created from these survey results and will be added to those already supplied (ref 4 above). These new records will be forwarded to you shortly.
- 7) All these new records will be copied to Sussex Biodiversity Records Centre (SxBRC) during the annual transfer of SOS records which will take place during autumn 2017, although SxBRC may take some further weeks to upload the circa 200K records of birds across Sussex that will be shared with them at that time. In turn SxBRC will probably upload these records to the National Biodiversity Network sometime during 2018. For the present therefore, the SOS is the only source of these records for RSPB, Natural England and Arun DC, and it is requested that Arun DC make them available to the appropriate developers and ecological consultants as they provide important new biodiversity information.
- 8) These records show that these two sites, on the west side of Pagham Road, are used by 4-figure numbers of Brent Geese, and by three-figure numbers of Lapwing, Golden Plover and Curlew, as well as by smaller numbers of Mute Swan and Black-tailed Godwit. Even larger numbers of these species are regularly found to the west in SZ8797 and SZ8798 – the area known as the North Fields.
- 9) When interpreting bird records it is important to realise that flocks of wintering Brent Geese and other species will NOT be using a particular site every day. So if people go out looking for birds in just a small site, such as occurred in the Ecology survey carried out for site P/25/17/OUT, it is quite likely that Brent Geese

would have been somewhere else on each of the three days that the survey was carried out – as turned out to be the case on these occasions.

- 10) Geese and waders are naturally wary when grazing or roosting, posting lookouts around the edges of the flock. They may come quite close to Pagham Road, because the field is screened from it by a high hedge and most human presence along Pagham Road is currently in passing cars rather than visibly on foot. However, were P/140/16 to be developed they would almost certainly come no closer than 300 metres to the western edge of the housing estate, because of the visible and audible presence of humans and their pets. This means that the loss of grazing would not just be of the 23ha of land on which buildings would be developed but of an almost equal area of land to the west of it. The remaining open land to the west and south of P25/17/OUT would similarly become a no go area for wintering birds.
- 11) The fact that a footpath is planned to go down the western edge of P/140/16/OUT is particularly unacceptable as walkers and dogs using it will create the maximum disturbance for wintering birds.
- 12) In other words were these developments to go ahead there would be a significant loss of land available for these wintering Brent Geese, Lapwing, Golden Plover and other wetland birds to use as roosting or grazing sites – all other things being equal.
- 13) We also note that P/140/16/OUT highlights that this development will facilitate access to the wider PROW (ref Network Plan Drawing DLA.1731.L0003.11. RevA). We particularly object to the 4.3km (yellow) proposed cycle route as it will go along the North Wall of Pagham Harbour and be partially within the boundary of the Special Protected Area and the RSPB Reserve. The North Wall is a particular “hot spot” for birders, who often stop on it and set up their telescopes. It therefore should not be a cycle route, both for birding reasons and for health and safety reasons, and any development that seeks to facilitate such a route will be opposed.
- 14) SOS is aware of, and supports, the Mitigation measures agreed between Arun and Chichester District Councils, and Natural England and RSPB, whereby a levy is made on each new house built within a 5 kilometre radius of the Pagham Hbr RSPB Reserve, in order to fund one or more wardens so that the resulting increase in visitor numbers at the RSPB Reserve can be educated on how to behave within the reserve, including keeping their dogs under control. However, these measures only mitigate the impact that the increased numbers of visitors will have on the reserve – they are not mitigation for the loss of wintering grounds for the birds themselves.
- 15) Basically SOS believes that there should be no new development on the west side of Pagham Road and particularly south of Summer Lane, as any such development will result in loss of roosting and grazing land for wintering birds,

other things being equal. For these reasons we OBJECT to P/140/16/OUT and P/25/17/OUT.

- 16) Pagham Harbour is of course an extremely important site for birds, being both an internationally recognised RAMSAR site, and a European protected SPA (Special Protected Area for birds) – the two highest designations a site can have. Its wintering populations of Dark-bellied Brent Geese and Black-tailed Godwit underpin these designations. It is one of the top 10 birding sites in West and East Sussex attracting many bird watchers to the local area. For these reasons we believe that the last thing Arun DC should be doing is to approve these applications and thereby knowingly impact one of the very best wildlife sites in Sussex.
- 17) Were some mitigation measures to be proposed to offset these two applications being approved SOS would not automatically support them for the reasons stated in 16 above – we would need to examine the measures first of all.
- 18) These two applications cover SD1 in the emerging Arun Local Plan. SD1 is planned to deliver 400 houses, yet P/140/16/OUT is for 400 houses, plus other buildings, and P/25/17/OUT is for a further 85 houses, making 485 in total for the two applications. Therefore Arun do not need to approve both applications to meet their goal of building 20,000 new houses between 2011 and 2031, and it seems crazy to try and exceed your own building targets by developing in such a sensitive wildlife area.
- 19) The SOS does not believe that wintering wetland birds will be significantly affected by proposals P/6/17/OUT or P/134/16/OUT. Whilst there may be many non-bird reasons to object to these proposals we believe that the impact of resulting greater visitor use of the RSPB Reserve from these new homeowners should be mitigated by the Mitigation Measures referred to 14 above. For this reason we are not objecting to these two development proposals.

BRENT GEESE SURVEY, PAGHAM ROAD, JULY 2017.

I undertook this survey in conjunction with PAGAM and the Sussex Ornithological Society following concerns that the Wildlife Report prepared by Ecology Solutions for Hanbury Properties had not identified Brent Geese using the fields that were the subject of planning application P/140/16/OUT.

The survey was to include all those properties in Pagham Road that overlooked the fields subject to the above planning application. This included all those properties between Sea Lane and Church Way, Pagham. A total of 58 properties. I only interviewed residents who had lived in Pagham Road for more than 3 years. This excluded 4 properties. 2 other residents declined to be interviewed, 2 properties were unoccupied and 18 householders were not in despite my calling 3 times. This meant I interviewed residents at 32 properties during the period 22nd July to 29th July.

Residents were asked 6 questions.

1. Address
 2. How long they had lived there.
 3. Had they seen Brent Geese – annually, regularly, occasionally, never.
 4. Had they seen Brent Geese in 1000's, 100's or less.
 5. What other wildlife had they seen on the fields.
 6. Any other comments.
2. Length of residence ranged from 47 years to 5 years. The average was 21 years.
3. 31 houses had seen Brent Geese annually. 97%
4. 27 houses had seen flocks of Brent Geese in excess of 1000. 84%.

Whilst walking Pagham Road I encountered 6 local dog walking villagers all of whom reported seeing Brent Geese on the fields on an annual basis.

5. Other wildlife recorded was as follows. The figure in brackets indicates the number of houses reporting.
 - Mammals – Bats (21), fox (12), and Deer (5).
 - Birds – Gulls (14), Lapwing (6), Skylark (5), Mute Swan (3), Curlew (2), Grey Heron (2), Pheasant (1), Partridge (1) and Birds (2).
 - Other – Slow Worms (2).
6. Any other comments:

Many residents had considerable concerns about the possible impact of 400 proposed homes on the village infrastructure. I only recorded comments relevant to a wildlife survey. Many residents felt an affection towards the geese and looked forward to their return each year. The geese were seen as a local attraction. Several residents had noticed that numbers were down during the months of January – March 2017. A number thought that this was due to the increased usage of bird scaring devices. Residents regretted that the approval of this planning application would mean the loss of valuable agricultural land and the loss of a habitat clearly favoured by Brent Geese.