

Date: 18 August 2017
Our ref: 222111
Your ref: P/140/16/OUT



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BY EMAIL ONLY

Dear David

Planning consultation: Outline application for access only - mixed use development comprising of up to 400 dwellings, a care home with up to 70 beds, a Local Centre comprising up to 2000sqm of A1/A2/A3/D1/sui generis floorspace, provision of land for a 1FE primary school (with sufficient space to ensure that it is expandable to 2FE), provision of land for a scout hut, safeguarding of land to help link the site to the Pagham Harbour Cycle Route & other community uses including public open space & allotments with some matters reserved

Location: Land South of Summer Lane & West of Pagham Road Pagham

Thank you for your consultation on the further information and amended details in relation to the above application, dated 25 August 2017 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION SUBJECT TO MITIGATION

Natural England's letter, dated 13 February 2017, stated that the proposal was unlikely to have a significant effect on Pagham Harbour Special Protection Area (SPA)/Ramsar site, provided that financial contributions were made to the strategic approach to mitigating recreational disturbance at Pagham Harbour. Our letter also stated that loss of foraging habitat is not likely to have a significant effect. Having reviewed the additional information in respect of foraging dark-bellied brent geese, this conclusion has not changed.

European sites – Pagham Harbour Special Protection Area

Natural England's letter, dated 13 February 2017, set out our views on the potential impacts of the proposal on Pagham Harbour SPA/Ramsar site. This letter does not repeat our conclusions in relation to recreational disturbance and water quality, as no new information has been presented regarding these issues. Instead, this letter focusses on the potential use of the application site by foraging dark-bellied brent geese.

As noted in our previous letter, the size of the fields within the application site, and their location within 500m of the SPA, mean that brent geese may feed there when they are planted with a

suitable crop. However, we concluded that as surveys commissioned by the applicant, and a historic data-search, had not recorded any use by brent geese, and given the availability of alternative foraging habitat around the SPA, the loss of the application site as foraging habitat was not likely to have a significant effect alone, or in combination.

Subsequent to this, an additional review of records from the Sussex Biodiversity Records Centre has been commissioned by Pagham Parish Council¹, and additional records have been submitted by Sussex Ornithological Society (SOS). These submissions state that brent geese use the application site for feeding. I, therefore, suggested, in an e-mail to you dated 1 August 2017, that this information be reviewed to check the validity of the previous conclusions.

As stated in Natural England's previous letter, where brent geese regularly forage on land outside the SPA/Ramsar site, this land may be considered functionally linked to the SPA/Ramsar by providing supporting habitat. Loss of functionally linked land should be considered in any in combination assessment of impacts under the Habitats Regulations. The key question, therefore, is whether the additional information suggests that brent geese regularly use the application site for foraging.

Having reviewed the historic bird records helpfully provided by the SOS, there is one record of a flock of 1500-2000 dark-bellied brent geese within the application site from 25/1/2004. This record may have been missed from the previous data searches undertaken as it was only recorded in the comments section against a record of a pale-bellied brent goose. Further brent geese sightings were recorded with a four-figure grid reference, but it is not possible to say whether these were present within the application site. The SOS also submitted a number of additional records sourced from local birders, which had not been previously submitted to the Biological Records Centre. Four of these records were for brent geese but none have grid references within the application site. However, one of these records may have the wrong grid reference attached as the comments state that the 2500 brent geese were seen on 20/1/16 in fields alongside the village hall, implying that this record is from the application site.

Whilst brent geese clearly use the application site, and occasionally in large numbers, Natural England's view is that there is insufficient evidence to suggest that brent geese regularly use the application site for foraging. Therefore, we maintain our view that, given the availability of alternative foraging habitat around the SPA, the loss of the application site is not likely to have a significant effect.

The data submitted suggests that fields to the west of the application site are more regularly used by brent geese. However, the fact that there are records from fields adjacent to the existing built up area, shows that geese will forage near to existing housing. This suggests that the screening proposed as part of the application is sufficient mitigation to minimise effects on geese using adjacent fields. The increase in housing will increase the recreational pressure, including on brent geese foraging habitat, however, this is addressed through contributions to the strategic approach to mitigating recreational disturbance.

If you have any queries relating to the advice in this letter please contact me [REDACTED]

Yours sincerely

Alison Giacomelli
Sussex and Kent Area Team

¹ Report on Ecological Appraisals presented in support of applications for housing development at Pagham. Petra Billings Woodland Consultancy Ltd. March 2017