

David Innes
Strategic Development
Arun District Council



1 September 2017

Dear Mr Innes

Re: 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, 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

Ref: P/140/16/OUT

Many thanks for giving RSPB the opportunity to comment on this proposal.

The RSPB has reviewed the documents submitted with the application for a residential development on land at Summer Lane, Pagham, in relation to potential impacts on the nearby Pagham Harbour Special Protection Area (the SPA) and Ramsar site. Having considered the information provide and that of other respondees, our view is that further information is necessary to allow the Council to determine whether or not the application could have an adverse effect on the integrity of the SPA/Ramsar site.

We therefore **object** to the application until such information is available. We have set out our views in further detail below.

Recreational disturbance

The report describes the greenspace included as part of the development, which the applicant claims will reduce recreational pressure on the SPA/Ramsar site. The RSPB's view is that this greenspace may be used by some residents for short daily dog walks, and as such is welcomed. However, it will not replace

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residents' desire for longer walks or to visits the coast. Therefore, we consider that additional off-site mitigation will be required to ensure no adverse effects on the integrity of the SPA/Ramsar site.

The RSPB has been working with Arun and Chichester District Councils, and Natural England on a strategic approach to mitigating recreational disturbance to Pagham Harbour SPA/Ramsar site. This approach includes provision for a part-time year-round warden, signage and interpretation, a dog project and monitoring. The applicant's report to inform a Habitats Regulations Assessment (HRA) refers to this strategic approach and makes a commitment to contributing towards it. The RSPB welcomes this commitment and considers that a contribution towards the strategic approach, together with the proposed SANG, should allow the Council to conclude no adverse effects on the SPA/Ramsar arising from increased recreational disturbance.

Impacts on SPA supporting habitat

We note that the applicant undertook wintering bird surveys of the application site during 2014/15, which recorded no brent geese using the site. However, we note that additional information has recently been provided by Pagham and Aldwick Greenfields Action Movement (PAGAM) which indicates that a significant number of local residents have witnessed flocks in excess of 1,000 brent geese utilising the application site. While this information is not part of a systematic survey, it is the RSPB's opinion that the information nevertheless raises reasonable concern about the importance of these fields and their functional linkage to the SPA/Ramsar by providing supporting habitat.

The RSPB is increasingly concerned by the incremental loss of SPA/Ramsar supporting sites across the south coast as a whole, and we urge the Council to apply a high standard of protection to these sites, as required under the Habitats Regulations. Therefore, in order to fully determine the importance of the application site to feeding brent geese, the RSPB recommends following best practice highlighted in the Solent Brent Goose and Waders Strategy (2010) and request that the applicant undertakes a further 2 years of winter survey under suitable conditions (or existing recent data obtained, should it be available) to properly ascertain the usage of these fields by brent geese.

In the absence of such robust survey data, the RSPB would strongly recommend that the Council apply the precautionary principle and require suitable mitigation be secured – such as enhancements to alternative brent goose feeding sites outside in the locality – to ensure no net loss of brent goose feeding resource.

In conclusion, the RSPB objects to the application subject to either measures being secured to fully ascertain the importance of the application site as SPA/Ramsar supporting habitat (and appropriate mitigation being secured based on the survey results) or mitigation secured for the loss of a potentially significant area of SPA/Ramsar supporting habitat based on the information already provided to the Council by local residents.

The RSPB would appreciate being consulted further should new information come forward in relation to this application.

Yours sincerely



Dora Querido
Conservation Officer

