

[REDACTED]

From: Amanda Scholes on behalf of Planning.Responses
Sent: 13 March 2019 10:14
To: Planning Scanning
Subject: FW: Brent Goose Mitigation Plan for Pagham Harbour - the mistruth.
Attachments: MitField1.1.1.1.JPG; N.ofMitField.1.png; MitField4.jpg; Field9029Pan1.png; 9029LookingS1.png; 9029waterlogging1.jpg; P.140.16.OUT.site.png; LandPlan.pdf; MarshEstimate.pdf; Cropping His.pdf

From: David Easton
Sent: 11 March 2019 09:06
To: Planning.Responses
Subject: FW: Brent Goose Mitigation Plan for Pagham Harbour - the mistruth.

Could this please be uploaded to P/140/16/OUT as a letter of representation.

From: giles binyon [REDACTED]
Sent: 10 March 2019 18:18
To: [REDACTED] David Easton [REDACTED] > GIBB, Nicolas
[REDACTED] Alan PAGAM [REDACTED]; CPRE [REDACTED];
[REDACTED]
Subject: Brent Goose Mitigation Plan for Pagham Harbour - the mistruth.

Dear Madam/Sir,

This letter relates to building development P/140/16/OUT for four hundred houses and other structures on land south of Summer Lane, Pagham, West Sussex.

I have kept it as succinct as possible in the hope that as many people as possible can read it and quickly assimilate the facts.

To counter the loss of Brent Goose foraging land due to this development beside the internationally recognised Nature Reserve, Pagham Harbour, Hanbury Properties Ltd used Ecology Solutions who, in consultation with Natural England, have formulated a Brent Goose Mitigation Plan (BGMP).

Having spoken to Sussex Ornithology Society there are concerns about this BGMP from a wildfowl habitat perspective. However, I would rather focus on the area and quality of the land involved as we have the plans and cropping history supplied within the BGMP, along with my attached aerial photographs and estimates. In this way the evidence is immediate and incontrovertible.

Put simply, the essence of the BGMP is to secure enough goose foraging land to replace that lost to the building. It proposes to do this by gaining control of the three fields - 9309, 9029 and 1141 on the Rural Land Register Plan (RLR Plan - in the BGMP and attached). A cessation of bird scaring within this area and some hedge grubbing are also proposed.

According to the BGMP (para 2.15 - 2.20) the foraging area lost to building is approximately 18.7 hectares (ha). This calculation has, quite reasonably, taken into account that sometimes the land lost would not have been planted with suitable foraging anyway and a weighting to the area calculation has thus been applied. It goes on to say (para 3.13) that for the mitigation land "measures will result in improved sightlines within approximately 18.5ha of farmed land", although the plan provides no figures or calculations for this figure as being the area of mitigation land.

It does state however, that of this 18.5ha approximately 5ha (outlined in red on the attached aerial photographs) is for long term enhancement for the geese. It states that it comprises of land under arable cultivation and also of "rank wet grassland". It does not detail the proportion of arable land compared to that of rank wet land. It proposes that this 5ha and the remaining mitigation land be put under a land management plan (Habitat Management Plan) for the purposes of goose foraging.

Please see the first 3 attached photographs (MitField1.1.1.1, N.ofMitField.1 and MitField4) and also the attachment (MarshEstimate) which shows that of the 5ha set aside for long term enhancement (marked in red) there is actually approximately 3.59ha that is, in the words of the BGMP, "rank wet grassland".

Please see the next 3 photographs of field 9029 (Field9029Pan1, 9029LookingS1 and 9029waterlogging1) and also again the attachment (MarshEstimate) which shows that an additional approximately 1.81ha of "rank wet grassland" exists in field 9029. The BGMP makes no mention of this.

The above photographs were taken in December 2018 after a relatively dry winter which followed on from a dry and hot summer. The cropping history (a copy is also attached) obtained by Ecological Solutions and used for their calculations reveals that two of the fields (there are no figures for 1141) within the mitigation area are only rarely planted with winter wheat, a goose foraging crop. In addition field 9309 is regularly left to lie fallow. This is in contrast to other fields outside of the mitigation area, none of which have been left to lie fallow and the largest one by far has been planted with winter wheat in 6 years out of 7. On studying the aerial photographs and the cropping history an International Horticulturalist explained this disparity to me in terms of poor drainage leading to potential crop failure due to rot at certain times of the plant's lifecycle. He confirmed too that the areas of "rank wet grassland" would, of course, be considered uncultivable.

The large field outside the mitigation area (7598) which was planted with winter wheat 6 years out of 7 can be seen in the last photograph (P.140.16.OUT.site) outlined in blue. This photograph was taken at the same time and date as the others and this field will be lost to the development.

In the latest letter (I can find) from Natural England, dated 18th Oct 2018, it states that mitigation measures must be shown to be deliverable and effective at the Appropriate Assessment stage and that "Provided that the Habitat Management Plan is required to ensure no net loss of foraging resource, Natural England's view is that this will avoid an adverse effect on integrity from impacts on brent geese foraging.....".

There is also a suggestion of a change of tack away from the idea of an area of mitigation land per se, to an area of land which can provide the same "amount of energy" from arable cropping.

After reviewing these photographs and estimates it is clear that there is reasonable doubt as to whether the amount of foraging land, either in terms of an area lost, or as an "amount of energy" lost, could be replaced by the land proposed within the current BGMP. In any case there has been no evidence presented, either (correctly) at the Appropriate Assessment or (incorrectly) since permission has been granted. It must, therefore, be assumed that it was wrong of the Planning Authority to grant permission. It may also contravene the Wildlife and Countryside Act 1981 at least for this species and possibly others also.

Yours sincerely,
Giles Binyon

PS
Dear Mr David Easton, may I please request that you put up this email and attachments onto the ADC Planning portal. Thank you.

(BGMP and associated material can be obtained under ref; P/140/16/OUT on the Arun District Council website under Planning)

Church Barton Farm, Pegham

Cropping 2011 - 2017

Field	Ha (gross)	2017	2016	2015	2014	2013	2012	2011
SZ 8898 8755	4.08	LET	WW	POT	WW	VEG	MZ	WW
SZ 8898 8433	7.49	LET	WW	POT	WW	VEG	MZ	WW
SZ 8897 7598	14.05	LET	WW/LET	WW/SW/LET	WW/LET	WW/LET	WW/POT	WW/LET
SZ 8798 9309	7.04	WW/FALL	SB/FALL	MZ/FALL	SW/FALL	SW/FALL	SW/FALL	WW/FALL
SZ 8798 9029	8.45	WW	SB	MZ	SW	SW	SW	WW

LET Lettuces
 WW Winter Wheat
 SW Spring Wheat
 FALL Fallow
 SB Spring Barley
 POT Potatoes
 VEG Vegetables
 MZ Maize

488000

488500

MITIGATION LAND PLANT

00500

CAMERA
POSITION

WATER LOGGED

2064

1141

8438

9029

FROM RLR

FIELD

AREA

1141

4.32 ha

9029

8.45 ha

9309

7.04 ha

RESERVOIR

WATER

x 95.09

- LOGGED

SZ8798 SZ8898

SZ8797 SZ8897

00000

CAMERA
POSITION

488000

488500

Please return this sheet to us if you want to make

ESTIMATE OF AREA OF MARSH WITHIN MITIGATION LAND















