



SUSSEX ORNITHOLOGICAL SOCIETY

Registered charity 256936

www.sos.org.uk

29 Cobbetts Mead
Haywards Heath
West Sussex
RH16 3TQ

25 April 2026

Planning Department
Arun District Council

FAO: Simon Davis
Principal Planning Officer
Email simon.davis@arun.gov.uk

Dear Simon

P/30/26/OUT & P/31/26/OUT

I am writing on behalf of the Sussex Ornithological Society (SOS) to **object** to these proposals. The SOS is the county bird society, with about 1900 members. Our aims are to record and study wild birds in the county, to assist in the conservation of birds and to engage, inspire and educate people to enjoy, appreciate and understand birds and their habitats. We have a database of over eight million bird records, which are shared with the Sussex Biodiversity Record Centre (SxBRC) and with other interested bodies.

Our objections are as follows.

- (a) The sites are a mere 0.65km from the Pagham Harbour Special Protection Area (SPA)/Ramsar Site and the initial Habitat Regulations Assessment (HRA) screening concludes that the development is likely to have significant effects on the protected area. It is argued that mitigation measures will prevent any harm, but the winter bird surveys of just one winter clearly show that the site is of considerable value to wintering birds including the Red-listed Curlew and Lapwing, so no amount of mitigation will prevent the loss of the habitats that these and other species use. The site is best considered as an integral part of the wider ecosystem that includes the protected area with birds using both the protected area and the surrounding land. In our view the proposals should be turned down for this reason alone: it is too close and too entwined, ecologically, with the SPA/Ramsar site.
- (b) No breeding bird survey was carried out, contrary to clear and long-standing guidance from Defra and Natural England. This is a serious omission. The bird survey report refers to the likely presence of at least one Red-listed breeding bird, the Yellowhammer, which is corroborated by SOS data.

- (c) Your own Planning Officer has stated that the application P/30/26/OUT contains errors on the protection of the SPA from disturbance and that the EIA does not meet best practice as it has not been supported by a local records biological data search.
- (d) The total of 76 bird species recorded by the winter surveys is a high number. However, the true number of bird species that have been recorded in the monad over the last 10 years is actually 115 (SOS database). This includes more than the land covered by the proposal, but indicates just how misleading the bird survey results are.
- (e) The wealth of birdlife in the monad, including in the proposed site, is therefore far greater than the ecologists' survey suggests. Even taking just wintering birds over the last 10 years, there are records of up to 3000 Dark-bellied Brent Geese, 240 Wigeon, 700 Golden Plover, 1300 Lapwing, 60 Curlew, 110 Black-tailed Godwit, 56 Common Gull, 473 Herring Gulls, 58 Great Black-backed Gull. All these species are Red or Amber-listed apart from Golden Plover. The site has also hosted rarities, including a Purple Heron. The six-figure grid references suggest that all these species counts were in the site proposed for development.
- (f) More broadly, we are extremely concerned about creeping urbanisation, and the infill of housing, on the land around the Pagham Harbour SPA/Ramsar site. Your own Biodiversity Action Plan aims to "improve how the natural environment is managed ... focuses on protecting, conserving and enhancing biodiversity, while creating a positive legacy for both current and future generations."
- (g) The Local Nature Recovery Strategy (LNRS) for West Sussex is likely to be approved imminently and this stresses the need for connectivity of wildlife habitats. It would be far more in keeping with the LNRS to seek to enhance the biodiversity value of the area, for example by controlling inappropriate recreational use, rather than allowing the site to be built on. We strongly urge Arun DC to set out red lines for development that will safeguard the biodiversity, amenity and wellbeing services provided by the precious Pagham Harbour protected area and its surroundings.

I hope that this additional information and detail is helpful to you and that the proposals will not be approved.

Yours sincerely,

Mark

Mark Mallalieu

Chair, Scientific Committee & Trustee, Sussex Ornithological Society

Site Name	Species Name	Arrival Date	Departure	Number	Breeding S	Grid Ref	Record Type	Notes	Count Type	Enterer	Finder	Nan	Source Name
Bognor Nye	Brent Goose	09/03/2015		50	X	SZ8898	A	(C) (12:30-14:00)	A	CCH	Whitehead		BTO Birdtrack data
Pagham Vil	Brent Goose	20/01/2016		2500	X	SZ884988	A	In fields alongside Village Hall. Grid ref is mid point of the flock. Extracted from http://s A	A	RC	Janman		
Pagham Vil	Brent Goose	15/01/2017		1600	X	SZ885983	A	Church Barton Reservoir. Extracted from http://selseybird.blogspot.com	A	RC	Weston		
Pagham Vil	Brent Goose	19/11/2018		329	X	SZ888981	A	SZ888981 329 dark bellied brent geese foraging on winter wheat on site of planning app	A	BTO	Weston		BTO Birdtrack data
Pagham Vil	Brent Goose	29/11/2018		2380	X	SZ888982	A	SZ888982 2380 dark bellied brent geese foraging on winter wheat on site of planning app	A	BTO	Weston		BTO Birdtrack data
Pagham Vil	Brent Goose	18/12/2018		830	X	SZ884980	A	2018/19 Brent Goose survey. 830 Brent Geese at 8:40. Planted with winter wheat - no b	A	RC	Weston		Pagham Brent Goose Survey
Pagham Hc	Brent Goose	18/12/2018		1760	X	SZ882980	A	2018/19 Brent Goose survey. 1780 Brent Geese at 10.05. Permanent pasture - no bird s	A	RC	Weston		Pagham Brent Goose Survey
Pagham Hc	Brent Goose	18/12/2018		1800	X	SZ881984	A	1800 BG counted in northern most of P/140/16/OUT mitigation fields along with 700 La	A	RC	Cowser		Pagham Brent Goose Survey
Pagham Hc	Brent Goose	18/12/2018		1800	X	SZ881984	A	In field 1141 of the proposed mitigation site for P/140/16/OUT	A	RC	Cowser		
Pagham Vil	Brent Goose	11/01/2019		2850	X	SZ884980	A	2018/19 Brent Goose survey. 2850 Brent Geese at 8:20. Flock extended east onto Hanb	A	RC	Weston		Pagham Brent Goose Survey
Pagham Vil	Brent Goose	12/01/2019			X	SZ8898	A	{Pagham Rd} (12:00-12:00)	A	P	BTO	Davy	BTO Birdtrack data
Pagham Vil	Brent Goose	19/01/2019		600	X	SZ889983	A	600 behind Village Hall for an hour in the afternoon	A	RC	Munday		
Pagham Vil	Brent Goose	15/02/2019		3000	X	SZ889982	A	SZ889982. 1640 15th Feb. 3000 dark bellied brent geese flew in to forage in field at the	A	BTO	Weston		BTO Birdtrack data
Pagham Vil	Brent Goose	16/02/2019		3000	X	SZ889982	A	SZ889982. Overcast day with poor visibility. 1340 3000 dark bellied brent geese flew in	A	BTO	Weston		BTO Birdtrack data
Pagham Vil	Brent Goose	17/02/2019		2240	X	SZ889982	A	SZ889982. mid afternoon 2240 dark bellied brent geese at rear of Pagham village hall. f	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	21/02/2020		37	X	SZ883981	A	2019/20 Pagham Brent Goose survey. 37 Brent at 9.00 on fallow land west of Shipverlin	A	RC	Weston		Pagham Brent Goose Survey
Bognor Nye	Brent Goose	02/03/2020		46	X	SZ883981	A	2019/20 Pagham Brent Goose survey. 46 Brent at 9.00 on fallow land west of Shipverlin	A	RC	Weston		Pagham Brent Goose Survey
Pagham Ha	Brent Goose	23/11/2020		7	X	SZ884989	A	(10:00-11:00) SZ884989 On P/140/16/OUT mitigation fields.	A	BTO	Weston		BTO Birdtrack data
Pagham Ha	Brent Goose	30/11/2020		460	X	SZ884989	A	(07:00-08:00) SZ884989 geese arrived 0820 but were disturbed by reed cutting operati	A	BTO	Weston		BTO Birdtrack data
Pagham Ha	Brent Goose	21/01/2021		510	X	SZ884989	A	(11:00-12:00) SZ884989 The first time I have recorded Brent Geese in the northernmos	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	05/11/2021		8	X	SZ8898	A	{Shipverling Barn} (08:00-08:20)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	06/11/2021		48	X	SZ8898	A	{Shipverling Barn} (09:00-10:00)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	07/11/2021		82	X	SZ8898	A	{Shipverling Barn} (09:45-10:00)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	08/11/2021		112	X	SZ8898	A	{Shipverling Barn} (09:00-09:30)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	09/11/2021		218	X	SZ8898	A	{Shipverling Barn} (08:15-09:30)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	10/11/2021		460	X	SZ8898	A	{Shipverling Barn} (08:30-09:00)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	11/11/2021		520	X	SZ8898	A	{Shipverling Barn} (15:00-15:20)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	12/11/2021		550	X	SZ8898	A	{Shipverling Barn} (13:00-13:20)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	12/11/2021		248	X	SZ8898	A	{Shipverling Barn} (08:10-08:30)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	13/11/2021		320	X	SZ8898	A	{Shipverling Barn} (10:15-10:35)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	14/11/2021		480	X	SZ8898	A	{Shipverling Barn} (10:25-11:00)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	15/11/2021		340	X	SZ8898	A	{Shipverling Barn} (13:00-13:20)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	16/11/2021		290	X	SZ8898	A	{Shipverling Barn} (12:00-12:15)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	17/11/2021		280	X	SZ8898	A	{Shipverling Barn} (10:00-10:40)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	18/11/2021		360	X	SZ8898	A	{Shipverling Barn} (09:05-09:20)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	19/11/2021		140	X	SZ8898	A	{Shipverling Barn} (09:45-10:00)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	20/11/2021		300	X	SZ8898	A	{Shipverling Barn} (13:15-13:30)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	22/11/2021		420	X	SZ8898	A	{Shipverling Barn} (10:00-10:30)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	23/11/2021		440	X	SZ8898	A	{Shipverling Barn} (10:00-10:25)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	24/11/2021		580	X	SZ8898	A	{Shipverling Barn} (09:20-09:50)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	25/11/2021		460	X	SZ8898	A	{Shipverling Barn} (10:00-10:20)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	26/11/2021		48	X	SZ8898	A	{Shipverling Barn} (09:40-10:00)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	27/11/2021		1	X	SZ8898	A	{Shipverling Barn} (10:10-10:20)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	30/11/2021		4	X	SZ8898	A	{Shipverling Barn} (09:00-09:15)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	01/12/2021		4	X	SZ8898	A	{Shipverling Barn} (09:10-09:20)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	02/12/2021		3	X	SZ8898	A	{Shipverling Barn} (08:30-08:40)	A	BTO	Weston		BTO Birdtrack data
Bognor Nye	Brent Goose	02/03/2023		150	X	SZ8898	A	(c){Summer Lane} (13:10-13:45)	A	BTO	Seabrook		BTO Birdtrack data
Bognor Nye	Brent Goose	20/11/2024		400	X	SZ8898	A	(+){Shipverling Barn} (11:57-16:00)	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	03/12/2024		128	X	SZ8898	A	{Shipverling Barn} (09:59-14:10)	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	04/12/2024		447	X	SZ8898	A	(+){Furze field Barn} (10:40-14:45)	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	18/12/2024		537	X	SZ8898	A	{Shipverling Barn} (10:51-15:05)	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	02/01/2025		20	X	SZ8898	A	{Shipverling Barn} (10:29-14:40)	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	14/01/2025		725	X	SZ8898	A	(+){Furze field Barn} (09:31-13:30)	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	11/02/2025		600	X	SZ8898	A	(+){Shipverling Barn} (08:27-12:35)	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	12/02/2025		613	X	SZ8898	A	{Furze field Barn} (09:15-13:25)	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	19/02/2025		1000	X	SZ8898	A	(+){Shipverling Barn} (12:52-17:00)	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	25/02/2025		84	X	SZ8898	A	{Furze field Barn} (07:02-11:10)	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	27/11/2025		210	X	SZ8898	A	(+){Furze field Barn} (12:21-16:20) On field by Church Lane south of my view point	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	09/12/2025		500	X	SZ8898	A	{Furze field Barn} (12:08-16:25) Over SPA in distance	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	17/12/2025		354	X	SZ8898	A	{Furze field Barn} (07:18-11:25) 250+ SZ883977;	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	24/12/2025		400	X	SZ8898	A	(+){Furze field Barn} (11:35-15:35)	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	06/01/2026		7	X	SZ8898	A	{Furze field Barn} (10:25-14:40)	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	19/01/2026		70	X	SZ8898	A	(+){Furze field Barn} (08:53-13:10) Flying in distance over Pagham Harbour	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	29/01/2026		10	X	SZ8898	A	{Furze field Barn} (06:45-10:35) Over SPA	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	09/02/2026		150	X	SZ8898	A	(+){Furze field Barn} (12:58-17:10) 150 SZ874975;	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	16/02/2026		5	X	SZ8898	A	{Furze field Barn} (08:04-12:05)	A	BTO	Codlin		BTO Birdtrack data
Bognor Nye	Brent Goose	11/03/2026		3	X	SZ8898	A	{Furze field Barn} (13:58-18:00) 3 SZ876976;	A	BTO	Codlin		BTO Birdtrack data



From: Elaine Walby on behalf of Planning.Responses
Sent: 30 April 2026 13:12
To: Planning Scanning
Subject: FW: FW: Pagham Harbour - Brent Geese sightings reference a Planning Application - P/30/26/OUT + P/31/26/OUT
Attachments: FINAL 25 April 2026 P3026OUT.docx; SZ8898 Brent Geese 2015-2026.pdf

PL- Rep- Sussex Ornithological Society response

Please redact

Elaine Walby
Technical Support Assistant
Planning Services

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E: elaine.walby@arun.gov.uk

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Our priorities...



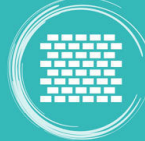
Improving the wellbeing of Arun



Delivering the right homes in the right places



Supporting our environment to support us



Fulfilling Arun's economic potential



Our core foundations

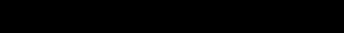


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From: Simon Davis <Simon.Davis@arun.gov.uk>
Sent: 29 April 2026 09:42
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: FW: FW: Pagham Harbour - Brent Geese sightings reference a Planning Application - P/30/26/OUT + P/31/26/OUT

Please upload this including the attachments as an objection to both P/30/26/OUT + P/31/26/OUT from the Sussex Ornithological Society

Simon

From: Mark Mallalieu 
Sent: 25 April 2026 19:33
To: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: Re: FW: Pagham Harbour - Brent Geese sightings reference a Planning Application

CAUTION: This email originated from outside of the organisation. You should take extra care when clicking links or opening attachments - if you are unsure the content is safe contact the IT Helpdesk before clicking or opening.

Dear Simon

My apologies for the delay in replying. The short answer is that Sussex Ornithological Society records indicate that up to 3000 Brent Geese have used the site in several of the last 10 years. The attached spreadsheet for the SZ8898 monad contains our records (which are also available from the Sussex Biodiversity Records Centre). Some of the records have six-figure grid references that indicate that the birds were within the proposed development sites. We would expect the geese to return in winters when winter wheat or other suitable forage is planted.

The SOS objects to these proposals for the reasons set out in the attached letter. Please could you add this to the online representations for the proposals and please could you also acknowledge receipt of this email and the attachments. Many thanks.

Kind regards,

Mark (on behalf of the Sussex Ornithological Society)

Mark Mallalieu CBE
Trustee, Sussex Wildlife Trust,
Chair, Scientific Committee, & Trustee, Sussex Ornithological Society


From: Simon Davis <Simon.Davis@arun.gov.uk>
Sent: 13 April 2026 16:17

1

To: [REDACTED]
Subject: Pagham Harbour - Brent Geese sightings reference a Planning Application

Dear Sir/Madam,

I was unsure who to write to at the SOS hence have included both these email addresses.

Arun District Council has recently received two planning applications for residential development on the site in red below:



We need to consider the impacts of the proposed development upon Dark bellied Brent Geese associated with the Pagham Harbour Special Protection Area. The applicant has provided a Winter Bird Survey for the period October 2024 to March 2025 which recorded no Brent Geese sightings. This was carried out after the Maize crop had been harvested and it is noted that there has not been any Winter Wheat planted on the site since 2022/23. The planning applications can be viewed using our search here: <https://www.arun.gov.uk/planning-application-search> and references P/30/26/OUT (120 dwellings) or P/31/26/OUT (130 dwellings).

I have been reviewing other data sources for Brent Geese. The Habitat Regulations Assessment carried out for the Arun Local Plan in 2017 referenced that 747 Brent Geese had been recorded at the Pagham WwTW in Dec 2014 whilst the Bird Blog/Birder Records recorded 2500 on the actual application site on 12/02/2012. Sussex BRC records do not appear to identify any Brent Geese records specific to the application site.

I am therefore writing to you to ask how your own records compare? Do yours show any recent greater use of the application site area?

Kind Regards

Simon

Simon Davis MRTPI

Principal Planning Officer, Directorate of Growth

T: 01903 737874

E: simon.davis@arun.gov.uk

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Arun District Council, Civic Centre, Maltravers Rd
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Our priorities...



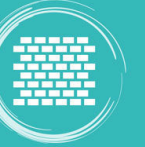
Improving the wellbeing of Arun



Delivering the right homes in the right places



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Our core foundations




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