



Sussex
Wildlife Trust

Contact: Jess Price

Date: 18 January 19

By email only

david.easton@arun.gov.uk

Attn: Mr David Easton
Arun District Council

Dear Mr Easton

Application Reference: P/6/17/OUT

Proposal: Outline application with some matters reserved for construction of up to 300No. new homes, Care home of up to 80No. beds, D1 uses of up to 4000sqm including a 2 form entry Primary School, formation of new means of access onto Hook Lane & Pagham Road, new pedestrian & cycle links, the laying out of open space, new strategic landscaping, habitat creation, drainage features & associated ground works & infrastructure.

Location: Land North of Hook Lane, Pagham

The Sussex Wildlife Trust (SWT) understands that the above proposal will be going to planning committee next week on 23rd January and wish to reiterate our objection.

We are concerned that Arun District's natural capital cannot absorb this level of development and that the cumulative impact of this proposal, along with P/134/16/OUT, P/140/16/OUT and P/25/17/OUT has not been fully considered.

We draw the committee back to the Arun Local Plan 2011-2031 which states within its strategic objectives:

'To plan for climate change; to work in harmony with the environment to conserve natural resources and increase biodiversity'

The Sussex Wildlife Trust acknowledges that the sites are allocated in the Arun Local Plan but remain apprehensive about the cumulative impacts of the developments on the Green Infrastructure (GI) network and subsequently biodiversity value of the area.

We note that Strategic Allocations SD1 and SD2 sit within a strategic gap and Green Infrastructure corridor on the Green Network Map for Pagham (2012).

Policy GI SP1 states that *'the existing green Infrastructure Network, as shown on the Green Network Maps for each parish and town, must be considered at an early stage of the design process for all major development*

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Chief Executive: Tor Lawrence

proposals. All major development must be designed to protect and enhance existing Green Infrastructure assets and the connections between them, in order to ensure a joined up Green Infrastructure Network'.

Policy H SP2 states that '*Strategic Site Allocations Development proposals within the Strategic Site Allocations must be comprehensively planned and should have regard to a masterplan endorsed by the Council for the respective area as which incorporates high quality imaginative design giving a sense of place and a permeable layout. The comprehensive development of the allocation will need to meet the following key requirements...
...c. Protects, conserves or enhances the natural environment, landscapes and biodiversity'.*

Like the RSPB, the Sussex Wildlife Trust are concerned about the incremental loss of SPA/Ramsar supporting sites across the south coast and do not feel that a strategic approach to the preservation and enhancement of Dark-bellied Brent Goose foraging habitat has been followed in the allocation of these sites in the Local Plan. We support their objections and recommend that the precautionary principle is followed by Arun District Council.

We also support Natural England's position that there must be no net loss to foraging habitat, and given the losses to biodiversity acknowledged in the 25 year plan for the Environment, would like to see net gains in terms of the quality and quantity of SPA/Ramsar functionally linked habitat.

We note that these outline applications have been in discussion for a considerable amount of time and as such will now be assessed against the 2018 National Planning Policy Framework. We take this opportunity to remind Arun DC that the revised framework very clearly states in section 170(d):

Planning policies and decisions should contribute to and enhance the natural and local environment by:

(d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

The Sussex Wildlife Trust would like to express its disappointment that the impact of these allocations on the District's natural capital assets, in particular the designated sites, was not better assessed during the development of the Local Plan. The length of time it has taken for these outline applications to progress demonstrates that the evidence base at the time of allocation was not sufficient. These issues should have been highlighted through the site allocation process in order to better understand the sites role in the function of the SPA/Ramsar (Pagham Harbour).

Yours sincerely

Jess Price
Conservation Officer