



Sussex
Wildlife Trust

By email only

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Dear Sir/Madam

Amendments to the Proposed Submission Adur Local Plan (2016)

The following comments are made on behalf of the Sussex Wildlife Trust in relation to the soundness of the **Amendments to the Proposed Submission Adur Local Plan (2016)**.

Following our comments on previous consultations of the Draft Local Plan, we are encouraged to see that some amendments have been made to imbed the importance of the natural environment into the Local Plan. However the Sussex Wildlife Trust is concerned to see that wording to deliver protection to biodiversity in some policies has been struck out. Therefore we question the soundness of the Adur Local Plan. We do not believe that the plan is consistent with national policy or that it sufficiently performs its environmental role of:

'contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy' National Planning Policy Framework (NPPF) Paragraph 7.

Part One - The Adur Local Plan

We are pleased to see that Adur District Council (ADC) has set out key issues for the District and that these include a broad recognition of the importance of the natural environment. We are encouraged to see that they highlight the need to maintain and enhance those assets as well as actively facing the challenges of climate change.

The plan sets out 11 vision statements and we are disappointed that the proposed submission fails to include a vision relating specifically to the biodiversity of the District. This section should

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contain a vision statement that clearly sets out the District's commitment to delivering a net gain in biodiversity.

The Sussex Wildlife Trust does support ADC recognition that an increase in natural capital will be needed to ensure the Council can deliver sustainable development within the District and that this has been reflected in the wording of Objective 6.

We suggest that the last sentence of Objective 7 '*New development will avoid impacts to biodiversity and the natural environment as far as possible, and mitigate and/or compensate where necessary*', should be amended to reflect the wording of NPPF paragraph 109 to a greater degree:

*'The planning system should contribute to and enhance the natural and local environment by: Minimising impacts on biodiversity and **providing net gains in biodiversity** where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.'*

We are unable to find the term net gains in biodiversity within the local plan and would encourage ADC to ensure that policy wording reflects this sentiment of the NPPF.

We also question whether Objectives 3 and 11 are mutually achievable. The plan suggests in Objective 3 *that to regenerate Adur... they will seek to (c) achieve strategic development at New Monks Farm...* Whilst Objective 11 states *to ensure that the risk associated with flooding are avoided and mitigated through directing development to appropriate locations and where this is not possible, through appropriate flood mitigation measures.* Given the flooding issues of this site, we question whether the evidence provided in the proposed submission is sufficient to enable Adur District Council to adequately assess the suitability of New Monks Farm for development and the level of development that is feasible on this site.

Part Two - A Strategy for Change and Prosperity

We are concerned that Policy 2: Spatial Strategy continues to propose the release of green field sites such as New Monks Farm for development, our comments from previous consultations for this site still stand.

The Sussex Wildlife Trust notes that the Objectively Assessed Need for Housing: Adur District 2015 study has highlighted that the number of proposed dwellings over the plans period has increased from (3,600-4,800) up to the revised figure of 5,820. We recognise that ADC has taken steps to look at how they deliver this number of dwellings and have come to the conclusion that plan will be unable to deliver 2211 of these dwellings over the period of the plan.

In order to deliver the remaining 3609 dwellings, ADC is proposing to build on greenfield sites. We ask what steps ADC have taken to ensure that by delivering these 3609 dwellings they will still be able to deliver the 6th Objective of the plan, to increase the District's Natural Capital.

Section 2.17 of the plan seems to indicate a reduction of dwellings that will be delivered on brownfield sites. It is not clear in the schedule of changes why this modification has occurred as it simply refers to a change in monitoring information. The reason for this modification must be made clear as it represents a difference of some 113 dwellings.

Policy 5: New Monks Farm

Given the biodiversity and flood risk issues in this area, the Sussex Wildlife Trust has continued concern over this allocation. It represents further erosion of the green gap between Shoreham and Lancing, and we remain unconvinced that development in this green gap will contribute to the gain in natural capital which is vital for sustainable growth in West Sussex.

The Sussex Wildlife Trust is concerned that the modifications made to this policy are to the detriment of the site's biodiversity. As a Trust we have commented on this allocation and policy a number of times previously and we were encouraged by Adur Districts Councils recognition that housing numbers for this site needed to be considered in relation to the biodiversity and ecological functioning of the area.

During the last consultation about the New Monks Farm Allocation in December 2015 it was not made clear in the consultation that the increasing in housing to the upper range of 600 would result in the removal of wording to justify its viability in relation to the biodiversity.

By removing wording which safeguards the site's biodiversity in relation to the upper house numbers, the policy now fails to deliver the emphasis of NPPF Paragraph 114, to:

'Set out a strategic approach in their Local plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'

We strongly recommend that that the wording is reinstated given the value the site has in delivering a healthy functioning ecosystem for the District.

We support the additions made to the policy in respect to the following statement.

A site wide landscape and ecological management plan to be produced and implemented to the satisfaction of the local planning authority to ensure the long-term maintenance of retained and newly created on-site habitats.

However we would like to see the addition of wording that states that any ecological plans need to be based on up-to-date ecological information about the site and surrounding areas. This would ensure it is in line with paragraph 165 of the NPPF. This wording is also lacking from the biodiversity policy (32).

This addition is necessary because although we welcome the preliminary ecological appraisals that were carried out for these site allocations as part of the draft plan, it is important to recognise that it may still be a number of years before these sites come forward for development. In this time the ecological characteristics of the sites will have changed. Any future decisions about the ecological importance of the site, in terms of its connectivity and biodiversity assets, will need to be reassessed and based on up-to-date information relating to the site and its context with the ADC's proposed green infrastructure network.

We would encourage ADC to seek advice in relation to the suitability of the ecological surveys and the management plan when it is submitted, this should come from either in-house expertise or external consultees.

Policy 6: Land at West Sompting

The Sussex Wildlife Trust feels that this strategic allocation further erodes the green gaps between Worthing and Sompting. However we do welcome the inclusion of the biodiversity enhancements being suggested for the site and the potential to open up opportunities for local people to use the green gap with sustainable transport links. These proposed transport links should incorporate green infrastructure to ensure they align with the sensitivities of the landscape and support and enhance the ecological functioning of the area.

Section 2.61 and the supporting policies map (Map 3: Proposed Allocation at West Sompting) also indicate the expansion of the Cokeham Brook SNCI. We would suggest that a greater commitment to this is demonstrated by inclusion of wording to this affect in Policy 6.

Again we note that this policy and the other policies within the plan, fail to address the importance of up-to-date ecological information when formulating landscape and ecological management plans. It would be prudent to incorporate this into the policy wording to uphold the ethos of the NPPF section 109.

Policy 7: Shoreham Airport

We are pleased to see that paragraph 2.84 in the supporting text for Policy 7 recognising the importance of Shoreham Airport as a site which supports wintering and wading birds such as lapwing and skylark.

The Sussex Wildlife Trust still hold concerns about the suitability of this site for development given its important role as flood zone 3b (functional flood plain) and the acknowledged need for ecological mitigation if this area is developed. We are encouraged to see that ADC has taken our comments from previous consultations and strengthened this policy to ensure ecological enhancements are integral to any development on this site.

Policy 8: Shoreham Harbour Regeneration Area

We suggest that given the broad proposals in this policy and high level of housing suggested in the Shoreham Harbour area, a suite of ecological enhancements are considered within the policy wording.

We welcome the policies recognition that *'All development will be required to protect and enhance the areas important environmental assets and wildlife habitats...'* However we must reemphasise that along with seeking on site biodiversity gains in line with section 109 of the NPPF, the policy must consider off site biodiversity gains.

We are pleased to see the addition of wording in character area 5 that recognises and supports the opportunity *'To enhance biodiversity by creating and improving habitats and improved green infrastructure links, including landscape enhancements to social housing estates'*.

Depending on the steps taken to deliver the above statement ADC has the opportunity to excellently demonstrate how implementing green infrastructure improvements can increase the

District's Natural Capital, whilst simultaneously delivering multifunctional benefits to biodiversity and people's health and social wellbeing.

We are encouraged by the additions to the character areas which support improvements to green infrastructure. We do still raise concern that there is not recognition of the potential increase in visitor pressure on sites such as Wide Water Lagoon LNR and Shoreham Beach LNR. This policy should highlight the importance of securing 106/CIL payments for the long term management and monitoring of these sites, particularly given the presence of highly sensitive vegetated shingle priority habitat.

Part Three - Policies for Places

Policy 9 Lancing

Policy 10 Sompting

Policy 11 Shoreham-by-sea

Policy 12 Southwick and Fishersgate

Policy 13 Adur's Countryside and Coast

Policy 14 Local Green Gap

While we recognise the individual nature of these policies, we have an overarching concern that they fail to encapsulate the importance of the council's commitment to add to the District's natural capital.

We are pleased to see that the proposed plan still contains a policy to recognise the importance of the local green gaps within Adur, policy 14. Although we are concerned that other policies within the plan (policy 5 & 6), undermine it.

Part Four - Development and Management Policies

Policy 15: Quality of the built environment and public realm

The inclusion of natural features and biodiversity within this policy is welcome as it demonstrates the potential contributions that the built environment can make to biodiversity gains, in line with paragraph 118 of the NPPF. The policy's wording relating to the '*respect of natural features*' should clarify that '*positive contribution to biodiversity*' means a net gain as per section 109 of the NPPF.

We note the recognition of gardens in section 4.6 but suggest that the policy should include wording to resist the inappropriate development of gardens as suggested in the NPPF:

'Local authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.' NPPF paragraph 53

Policy 18: The Energy Hierarchy

We are disappointed to see the removal of this policy as we had been encouraged by the steps taken by the council to ensure development proposals contribute to the UK Governments legally binding commitments to reduce carbon emissions enshrined in the Climate Change Act 2008. While we recognise that this change is as a result of changes to Government policy, we take this opportunity to emphasise to the ADC that Climate change is the most serious threat facing biodiversity and therefore we would like this proposal to further identify micro generation as a requirement for each development.

Policy 30: Delivering Infrastructure

We welcome the recognition of green infrastructure within the section 4.83 and feel the policy has the potential to deliver considerable growth in natural capital for the district. The policy could ask that all development contributes not only to the green infrastructure needs of the development itself, but to the green infrastructure needs of the district as a whole, on a proportional scale to the development.

Policy 31: Green Infrastructure

Paragraph 4.93 highlights that the green infrastructure framework carried out by the South Downs National Park has been incorporated into the wording of the Adur Local Plan and will influence their future steps for the district own strategy and in the decisions they make on planning applications.

We are pleased to see the continued recognition of green infrastructure in the proposed submission plan. In our previous submissions we encouraged ADC to include policy wording that requires developers to show how their proposed development delivers green infrastructure both on a site level and how it links and enhances to the wider district's green infrastructure network. We are pleased to see that this is now within this policy.

The Trust is very disappointed to see that the council have removed their commitment to delivering a Green Infrastructure SPD within the policy wording. The schedule of change for the plan simply says that the reference to SPD deleted here to ensure consistency with other policies/text. However in the supporting text to the policy, 4.95 states

A Green Infrastructure SPD will be produced in order to provide a holistic approach to the provision of green infrastructure and to maximise the many benefits that green infrastructure brings.

Can we seek clarity from ADC as to their commitment to a green infrastructure SPD. As we have done in our previously consultation responses, we encourage the Council to ensure that they deliver a Green Infrastructure SPD that not only looks at mapping the current green infrastructure assets of the District, but that it is truly forward thinking and progressive in addressing issues of connectivity, climate change resilience and increases in natural capital. This approach reflects the ethos of NPPF paragraphs 99, 114 and 156 and will enable them to deliver towards Objective 6 of the plan.

Policy 32: Biodiversity

The Sussex Wildlife Trust welcomes the inclusion of this policy within the plan and its recognition of the hierarchy of designated sites and Biodiversity Opportunity Areas. We are keen that the sentiments of section 4.98 of the plan are also reflected in the policy.

This policy has the opportunity to reflect the NPPF further through highlighting the importance of landscape in the context of connectivity and its ecological functioning. The Sussex Wildlife Trust feels that this should be incorporated into this policy wording to bring it in line with paragraphs 109 and 114:

'The planning system should contribute to and enhance the natural and local environment by:

- *recognising the wider benefits of ecosystem services;*
- *minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; NPPF Paragraph 109*

'Set out a strategic approach in their Local plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure' NPPF Paragraph 114

Conclusions

The Sussex Wildlife Trust feel that a strong commitment to a Green Infrastructure Strategy SPD is imperative to ensure that the growing demand on natural capital can be assessed, especially given the high housing numbers suggested in the plan. We also encourage Adur DC to commit to an ecosystem services SPD to support sustainable development. Mapping of ecosystem services is still an emerging process, but great advances have been made in a short time. Given the suggested lifetime of the plan and the council's recognition within the plan that there needs to be growth in natural capital (Objective 6), a commitment to this approach must be taken.

In connection to the above point, we also make the following comments in relation to the Infrastructure Development Plan (IDP) that now forms part of the evidence base of the proposed submission local plan:

The Sussex Wildlife Trust welcomes the inclusion of a document that considers forward planning for needs such as Green Infrastructure. We are keen that Green infrastructure projects have the opportunity to progress as favourably as other projects with clear associated costing. Improving the level of detail within the IDP will give these projects a better chance of being considered for inclusion when money from CIL is distributed. The IDP will be an open working document and therefore we would like to see the inclusion of projects that ensure that areas such as Shoreham Beach LNR have resources to maintain a management plan. This could help to adequately address issues of increased visitor pressure, which may result from the proposals in Policy 8.

We feel that there needs to be stronger recognition of the need for net gains to biodiversity within the Plan, As it stands, we feel that the plan fails to sufficiently balance the three dimensions to sustainable development: economic, social and environmental. These roles are mutually dependent with no one dimension taking precedent over the other two (NPPF

paragraphs 7 and 8). It is not acceptable to disregard the potential environmental impact of site allocations due to concerns over viability.

At New Monks Farm, no evidence has been presented to suggest that potential impacts of the higher level of development on the hydrology and riparian habitats on the site can be adequately avoided or mitigated. We advocate a more joined up approach to ensure no adverse impacts and overall net gains to nature (NPPF paragraphs 9 and 109), particularly in relation to natural flood defences.

That said the Sussex Wildlife Trust recognises the importance of a plan led system as opposed to a developer led process. Therefore we hope that our comments are used constructively to make certain that the Adur Local Plan properly plans for the natural capital needed within the District and ensures that any development is truly sustainable.

Please do contact me if you would like to discuss any of the above points.

Yours sincerely

Laura Brook
Conservation Officer