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The following comments are made on behalf of the Sussex Wildlife Trust in relation to the soundness of the **Adur District Council Proposed Submission – Adur Local Plan 2014**.

Following our comments on the previous consultation of the Revised Draft Local Plan, we are encouraged to see that some amendments have been made to imbue the importance of the natural environment in the Local Plan. However the Sussex Wildlife Trust still questions the soundness of certain aspects of the Adur Local Plan. In particular whether the plan is consistent with national policy and 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.

Comments in relation to part one the Adur Local Plan

The plan sets out 11 vision statements. We are disappointed that the proposed submission has failed to include a vision relating to the biodiversity of the District. We would like this section contain a vision statement that clearly sets out the District's need to create an increase in natural capital to ensure that growth is sustainable.

The plan states that the vision statements are evidence based. A clear assessment of the green infrastructure and use of ecosystem services within the District is essential to ensure that their importance is recognised in the vision of the District.

We note that there has been 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.'*

Taking Care of Sussex

President: David Streeter MBE
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Chief Executive: Tony Whitbread

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We also question whether objective 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 monks farm...* While 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 monk's farm for development and the level of development that is feasible on this site.

Part Two A Strategy for Change and Prosperity

We note that the housing number has increased from the draft plan proposal of 2797-2947 to 3488-3638 in Policy 3 of the current proposed submission. We question the suitability of this increase given the considerable pressure on the natural environment already demonstrated by the housing within the draft plan.

Given this proposed increased of housing numbers over the lifetime of the plan, we remind Adur District Council that the allocation of strategic areas for development and strategic delivery policies should always be informed by data related to the functioning of ecological networks at a landscape scale and underpinned by up to date, site specific data.

This is inline with the guidance from the NPPF:

'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.' section 114

'Planning policies and decisions should be based on up-to-date information about the natural environment and other characteristics of the area...' section 165.

The Sussex Wildlife Trust is concern that the plan has not taken this aspect of NPPF guidance into full consideration when formulating its plans.

Strategic Allocation – New Monks Farm Policy 5

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.

Whilst we note that the wording of Policy 5 New Monks Farm Lancing has been altered in response to our previous representations, we still seek clarification on some of the detail. For example, the policy states that certain outcomes will be delivered as part of a landscape strategy/green infrastructure strategy. Are these outcomes part of a delivery towards the findings of the proposed Green Infrastructure Strategy Supplementary Planning Document to be devised by Adur District Council, or a green infrastructure strategy specific to the development? This is unclear in the current policy wording.

We welcome the incorporation of wording to ensure that a site wide landscape and ecological management plan is produced and implemented as part of the development. 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 inline 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 inclusion of 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 Adur DC's proposed green infrastructure network.

Strategic Allocation – West Sompting Policy 6

The Sussex Wildlife Trust feels that this strategic allocation further erodes the green gaps between Worthing and Sompting. However we do welcome the addition of the further 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.

We would like the policy to be improved to uphold the ethos of the NPPF section 109 in looking for net gains in biodiversity from all aspects of a development. Words to this effect would make the policy more robust.

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.

Policy 7 Shoreham Airport

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 still believe that the policy should go further in its wording to say '*ecological enhancements will be sought through all aspects of development on this site*'. However we are pleased to see the explanatory text taking on board our suggestions of green roofs to take into account visual sensitivities of the landscape, biodiversity opportunities and possible flood alleviation.

Policy 8 Shoreham Harbour

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 improvements made to the draft policy, which now includes 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 inline with section 109 of the NPPF, the policy must consider off site biodiversity gains.

The policy includes a priority to enhance connections between Shoreham town centre and Shoreham beach. There should therefore be 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 now contains a policy to recognise the importance of the local green gaps within Adur. In particular policies 13 and 14 look to deliver objective 6 of the plan which highlights Adur District Council's commitment to adding to their natural capital. We recognise that within the plan there are policies relating to biodiversity, but we would welcome greater recognition of the Council's commitment to deliver objective 6 in these areas with specific reference to biodiversity and/or natural capital in these policies.

Part Four Development 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, inline with paragraph 118 of the NPPF. The policies 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 Section 53

Policy 18 The Energy Hierarchy

The Sussex Wildlife Trust welcomes a policy that take steps to ensure development proposals contribute to the UK Governments legally binding commitments to reduce carbon emissions enshrined in the Climate Change Act 2008. 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 27 The Visitor Economy

This policy could reflect the Council's aim to deliver objective 6 by recognising the importance of the District's natural capital in attracting visitors to the area. We suggest that this policy be amended to refer to opportunities to increase the awareness and respect of biodiversity by visitors to Adur District. While this policy encourages minimising the impact on the environment, there is scope to include enhancements for any future tourist developments. This would be in line with the NPPF paragraph 118.

Policy 29 Transport and Connectivity

We would like to see join up between transport, connectivity and the potential to deliver transport links via the multifunctional benefits of green infrastructure, in the form of green footpaths and cycleways. The policy should also include wording to resist the paving over of front gardens for private parking, in recognition of the biodiversity and connectivity value of these spaces in urban areas (NPPF section 53).

Policy 30 Delivering Infrastructure

We welcome the recognition of green infrastructure within the section 4.84 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

We are pleased to see the continued recognition of green infrastructure in the proposed submission plan and particularly the inclusion of a commitment to a Green Infrastructure Strategy SPD by Adur District Council. We encourage the Council to ensure that this SPD 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.

As with our last submission, the Trust does feel that this policy needs to go further to say that all developments will be required to demonstrate how they contribute to the Green Infrastructure Strategy of Adur District Council, particularly given the council's commitment to producing an SPD. The policy wording should require 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.

Policy 32 Biodiversity

The Sussex Wildlife Trust welcomes the inclusion of this policy within the revised draft 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' NPPF, Para 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, Para 114.

Policy 33 Open Space, Recreation, Leisure

We note that this policy has been amended since the last round of public consultation and no longer contains a commitment to an Open Spaces SPD. Given that the new policy wording also suggest that *'should the need arise some open space would be considered for essential infrastructure development'*, we suggest that Adur DC renew their commitment to an open spaces SPD in this policy so that future decisions about the potential loss of open spaces can be adequately assessed at a planning application stage.

In Conclusion

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 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. However we are concerned that the lack of detail currently attributed to Green Infrastructure projects in the IDP means they will not 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.

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