



Sussex
Wildlife Trust

By email only

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Date: 24/7/17

Dear Sir/Madam

Main Modifications to the Submission Adur Local Plan (2017)

The following comments are made on behalf of the Sussex Wildlife Trust in relation to the Main Modifications to the Submission Adur Local Plan.

Having followed and commented on the Adur Local Plan throughout its production, we were pleased to follow this up with representation at the examination in public. Having read the main modifications published since the examination we wish to make the following comments.

The comments in this letter represent an overall opinion on the how the plan is now shaped, as we felt there was no opportunity to do this through the representation forms. We have attached specific representation forms which offer comments on specific main modifications.

We would like to emphasise that 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.

When the plan is looked at in its entirety we can clearly see that changes to policy wording have resulted in a significant shift in the delivery of this local plan. We recognise that throughout the process there have been concerns by some parties that the plan is not delivering the Objectively Assessed Need (OAN). However it was recognised as early as 2013, through the local generated housing needs study, that the housing demand would severely impact on the green space and biodiversity of the District.

During the examination process we have seen a number of policies changes, for example housing numbers and employment space quotas now read within in the allocation polices 'a *minimum of*' instead of '*approximately*'. This is a main modification present consistently throughout the plan in allocation policies and represents a stark difference for the future of the District.

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We question whether these main modifications are sound and consistent with national policy given that the evidence base for the local plan and the comments made by representatives have been based on the upper limits associated with the policies at time of submission.

In addition to concerns over the suitability of the evidence base, we would like to question the accuracy of the Addendum to the Sustainability Appraisal (SA). With no upper limit on housing or employment space within site allocations, how can the Sustainability Appraisal accurately assess the potential impacts of individual sites or hope to assess their impacts cumulatively? When this is coupled with the indicative boundary proposed within policy 5 for New Monks Farm, the Trust is concerned that the District's natural capital will be open to over exploitation which has not been fully assessed.

We note that section 7.2 of the Addendum to the SA does say that *the addition of a minimum requirement does not necessarily mean a blank cheque, allowing for unconstrained development but instead a mechanism to allow for greater floorspace quantum where this can be delivered appropriately in accordance with policies in the Local Plan.*

The reliance on policy is reflected in section 7.4 of the Addendum SA which states that main modification, MM8 proposes changing the housing provision to a minimum amount. The paragraph goes on to reflected that this could potentially allow for an increase level of housing within this allocation

Section 7.4 of the SA addendum goes on to say that any increase in housing numbers would still be subject to other policy requirements including the need to minimise impact on landscape, ecology, drainage etc. We take this opportunity to highlight that the National Planning Policy Framework (NPPF) clearly states the need for development to deliver a net gain for biodiversity not simply minimise impact.

What concerns Sussex Wildlife Trust is that this need for net gain is not reflected in the text of the Biodiversity Policy (32) in the Adur Local Plan. We did raise our concerns in our submission to the inspector prior to the examination in public but the opportunities to discuss these at the examination were removed. We are therefore concerned that the policy as it stands may not be robust enough to capture the demands that will be put on these sites with such open housing numbers.

If it is not possible to cap the proposed housing numbers for these allocations, we urge the council to revisit policies to ensure they are robust enough to deal with the individual and cumulative demands these allocation policies may create.

If the council /inspector are minded to accept the main modifications as they stand, we would ask that the council to ensure that a robust biodiversity policy is in place to ensure development delivers a net gain for biodiversity in the District. This would ensure they can continue to deliver towards vision 7 and objective 6 of the submission Adur Local Plan

This could be achieved by modifications to the biodiversity policy to incorporate the term 'net gain'

The policy currently says:

All development should ensure the protection, conservation and where possible enhancement of biodiversity.....

We suggest that it be amended to

*All development should ensure protection, conservation, enhancement and where **possible net gains** to biodiversity.*

We support the main modifications 11, 15, 17 that now ensure up to date ecological surveys will be carried out for allocations in policy 5, 6 and 7. In light of these positive main modifications we encourage the council to see the importance of the amendments in the Biodiversity policy we have suggested.

We support MM14 that will seek an extension to Cokeham Brooks Site of Nature Conservation Importance (SNCI). The Sussex Wildlife Trust suggests that the area and extent of the extension should be determined prior to development and should be based on decision made on up to date ecological information about the site at the time. We remind the council on a matter of accuracy that SNCI are now referred to as Local Wildlife Sites (LWS) in West Sussex and as such should be referred to as this in the Adur Local Plan.

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

Yours sincerely

Laura Brook
Conservation Officer