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Wildlife Trust

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Dear Mr Banks

The following statements is made on behalf of the Sussex Wildlife Trust in relation to the **Submission Adur Local Plan 2016 – Issues and Questions**

The following comments are made in relation to the questions raised about the submitted Adur Local Plan. Comments from our previous consultation response still stand.

This statement contains responses to the following Issues:

Issue 4 – Questions 4.1 & 4.2
Issue 5 – Questions 5.1 & 5.5
Issue 6 – Question 6.3
Issue 11 – Questions 11.1 & 11.2

Yours sincerely

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Representor - Sussex Wildlife Trust
Respondent reference –
Issue 4 – Land West at Sompting (Policy 6)

Question 4.1: Are all the requirements of Policy 6 reasonable, viable and deliverable?

Section 2.61 of the Adur Local Plan and the supporting policies map (Map 3: Proposed Allocation at West Sompting) implies the expansion of the Cokeham Brook Site of Nature Conservation Importance. We suggest that a greater commitment to this is demonstrated by inclusion of wording to this effect in Policy 6.

For example, we suggest that the policy includes the wording ‘**seek the extension**’ and reads as follows:

*‘The development must safeguard, enhance and **seek the extension of the Cokeham Brooks Site of Nature Conservation Importance**’*

Justification:

This will ensure that this policy can help to deliver the ethos of net gains to biodiversity core to the NPPF and in particular paragraphs 9 and 109.

The Sussex Wildlife Trust notes that policy 6 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 committed to within the policy wording. It would be prudent to incorporate this into the policy wording to uphold the ethos of the NPPF.

For example, we suggest the policy wording to could read as follows:

Prior to determination

*A site wide landscape and ecological management plan **that is informed by up to date ecological information, including information on the site’s utilisation and delivery of ecosystems services, will be produced. Mechanisms needed for implementation will be identified and secured.** This will be to the satisfaction of the local planning authority to ensure long term maintenance of retained and newly created on site habitats.*

Justification:

By taking this approach the policy will pay regard to paragraph 165 of the NPPF, while the inclusion of wording to reflect the importance of ecosystem services within the policy, will deliver towards NPPF paragraphs 109 and 117.

However, it also takes into account the progressive approach needed when future proofing the plan for the District’s environmental sustainability needs as championed by the Natural Capital Committee.

Question 4.2: There is reference in policy 6 to a landscape buffer along the western boundary. In policy 5 (New Monks Farm) the reference is to strategically site areas of woodland to the North and east of the development area to provide a distinct green edge, screening view of the new development, should there be a greater level of consistency between the two policies in this respect?

The reference to strategically site areas of woodland within policy 5 is made as a result of the report ‘Landscape and ecological surveys of key sites within Adur district 2012’. The difference in wording for these two policies reflects that policy 5 has been directly informed by this work. Page 38 of this report states strategically sited

blocks of woodland would extend the existing wooded character of the landscape to the north west of the site. This wording reflects the need to retain, enhance and extent the existing habitat rather than creating something completely new.

Policy 6 relates to allocation 'Land at West Sompting'. This allocation was not looked at holistically as one allocation by the 'Landscape and ecological surveys of key sites within Adur district 2012'. We suggest that the wording a 'landscaped buffer' recognise that the buffer will be needed to screen this development, whilst also having the potential to offer enhancements to the biodiversity of the site. The extent of buffer and the vegetation used should be determined as a result of up to date ecological information submitted at the planning application stage.

Therefore we do not see it necessary to provide a greater level of consistency between these two policies, with regards to this wording.

Representor - Sussex Wildlife Trust
Respondent reference -
Issue 5: New Monks Farm, Lancing (Policy 5)

Question 5.1: Are all the requirements of policy 5 reasonable, justified, viable and deliverable?

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 on this scale in the 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 that were 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 and 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 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

The Sussex Wildlife Trust notes that policy 5 fails to address the importance of up-to-date ecological information when formulating landscape and ecological management plans committed to within the policy wording. It would be prudent to incorporate this into the policy wording to uphold the ethos of the NPPF.

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 Adur District Council's proposed green infrastructure network.

For example, we suggest that the wording is changed to mirror the amendments we seek for the same paragraph in Policy 6.

Prior to determination

*A site wide landscape and ecological management plan **that is informed by up to date ecological information, including information on the sites utilisation and delivery of ecosystems services, will be produced.***

***Mechanisms need for implementation will be identified and secured.** This will be to the satisfaction of the local planning authority to ensure long term maintenance of retained and newly created on site habitats.*

Justification:

By taking this approach the policy will pay regard to paragraph 165 of the NPPF, whilst the inclusion of wording to reflect the importance of ecosystem services within the policy will deliver towards NPPF paragraphs 109 and 117.

Question 5.5: Is it sufficiently clear what new infrastructure is required, who is going to fund it and how it relates to the anticipated rate and phasing of development (PPG paragraph 018 under Local Plans)?

The Sussex Wildlife Trust has concerns that although Policy 5 clearly states that the development is to be connected to sewerage and distribution networks, the supporting text (paragraph 2.54A) indicates that if this is not feasible a sewerage treatment plant may be necessary.

Given the ecological sensitivity of the site's riparian habitats and surrounding area (Adur Estuary SSSI), we are concerned about the prospect of a planning application being submitted with package treatment works proposed for the allocation. Given the number of houses involved, flooding issues, climate change and ecological sensitivity of the site and surrounding areas we do not feel that this would be an acceptable outcome.

We are keen that this issue is addressed to ensure the allocation can be compliant with NPPF paragraphs 99 and 109

Issue 6: Shoreham Airport (Policy 7)

Question 6.3: What mitigation measures will be required in order to retain ecological value? Will their delivery have any implications in terms of the viability and delivery of the policy?

As with all approved site allocations, it is not known when they will progress to planning application stage. Due to this unknown element, it would be restrictive to include specific mitigation measures for a site when the ecology of the site and adjacent SSSI will evolve with time, and the way biodiversity will utilise the site in the future is currently unknown.

We encourage the policy to respect the current value of the site and surrounding habitats and to ensure that it is compliant with NPPF paragraph 165. We also request that update information is used to inform the mitigation measures required to maintain and enhance the ecological integrity of the airport and adjacent SSSI.

We support the policy's wording which requires ecological enhancement to be incorporated into the development, as this supports the ethos of NPPF paragraph 118. We would value a creative approach to these enhancements to ensure that bird boxes and bat boxes are not simply seen as the answer.

Issue 11: Green Infrastructure, Biodiversity and Open Space (Policies 31-33)

Question 11.1: Are all the requirements of policy 31 (Green Infrastructure) reasonable, justified and in accordance with national advice?

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 to and enhances the wider District's green infrastructure network. We are pleased to see that this is now within this policy.

The Trust is unclear why 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 the SPD was deleted here to ensure consistency with other policies/text. However in the supporting text to the policy, paragraph 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.

We recognise the policy does commit to a green infrastructure strategy, but seek clarity from Adur District Council as to their commitment to a Green Infrastructure SPD. 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.

Question 11.2: Are all the requirements of policy 32 (Biodiversity) reasonable, justified and in accordance with national advice?

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 more obviously reflected in the policy wording.

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

We are also keen that this policy reflects the clear ethos of NPPF which requires a net gain in biodiversity (NPPF Paragraph 9 and 109). This wording is not clearly evident in the policy and we would suggest that this could be achieved by wording to the effect:

*All development should ensure the protection, conservation and where possible enhancements **to biodiversity to ensure that there are net gains.***

In conclusion

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.