



Sussex
Wildlife Trust

Contact: Jess Price
E-mail: swtconservation@sussexwt.org.uk
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This response was submitted online via the consultation portal

Adur Local Plan Key Issues Consultation

Section 1 – Contact Info

Section 2 - Housing

How important do you feel these issues are for the Adur Local Plan area?

Select 1-5

4

Are there other key issues we have not identified?

Given the physical constraints of the district highlighted in this section, Adur District Council (ADC) needs to ensure a robust evidence base is produced to justify the housing targets chosen for the plan, including consideration of environmental limits. It is clear that there is not capacity to meet the full Objectively Assessed Need under the newly revised NPPF and as such, ADC must look at areas where development would not be suitable and consider how these areas can be robustly defended at Examination.

We recognise that the consultation document states in the biodiversity section that ADC will be seeking to protect areas of high ecological value. The Sussex Wildlife Trust (SWT) of course supports this approach but it's vital that these sites are not considered in isolation. ADC must consider the connections between these sites and their duty to 'identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks' as per NPPF paragraph 192 (December 2024). It is clear that the NPPF requires plans to consider corridors and networks for nature, not just designated sites. ADC must produce an evidence base to set out where these corridors exist in the plan area and how they can be protected and enhanced through planning policy. We also recommend that policy includes reference to the importance of the emerging Local Nature Recovery Strategy.

ADC made commitments in the current local plan to deliver environmental evidence bases such as a Green Infrastructure SPD (Local supporting text 4.92 & Policy 30 Green Infrastructure) that have not materialised. As a result, the opportunities that this SPD would have highlighted for the natural environment at a strategic and local level have been missed. This must not happen again. We note that Brighton & Hove City Council have produced a Green Infrastructure Study to inform their Issues & Options consultation. This document considers the use of the Urban Greening Factor (UGF) and looks at whether recently built out development in the city would meet the UGF. We

Woods Mill, Henfield, West Sussex, BN5 9SD
01273 492 630 | enquiries@sussexwt.org.uk | sussexwildlifetrust.org.uk

strongly suggest that ADC looks into a similar study and commits to embedding the UGF into the new plan.

Section 3 - Population and Communities

How important do you feel these issues are for the Adur Local Plan area?

Select 1-5

Are there other key issues we have not identified?

No response

Section 4 - Health

How important do you feel these issues are for the Adur Local Plan area?

Select 1-5

4

Are there other key issues we have not identified?

As stated previously, the Sussex Wildlife Trust (SWT) would like to see use of the Urban Greening Factor in the new local plan as a way to help improve delivery of good quality green infrastructure through development. We believe the lack of delivery of the current local plan's commitments to green infrastructure have led to missed opportunities and a lack of GI and accessible natural green spaces being provided in the plan area. This must be addressed through a robust evidence base that informs the emerging plan. We do not want to see commitments to studies and strategies in the plan, they must come before.

Section 5 - Climate Change

How important do you feel these issues are for the Adur Local Plan area?

Select 1-5

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Are there other key issues we have not identified?

Paragraph 20 of the NPPF (December 2024) is clear that strategic policies should make sufficient provision for planning measures to address climate change mitigation and adaptation. Additionally, paragraph 162 sets out that plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures.

Our previous comments in relation to the importance of having regard to the Local Nature Recovery Strategy and the need for robust evidence on the plan area's ecological networks have relevance for this section too. It is clear that for nature to both adapt to climate change and help to mitigate it, it must be able to move through the plan area via ecological networks. There has been a large amount of coastal squeeze as a result of development in the current local plan, both along the seafront and harbour and up the estuary. This cannot continue into the next local plan.

We note that the consultation document states that the local plan can direct development away from the areas of highest risk of flooding. However, due to the extremely constrained nature of the

plan area and the high OAN, we are concerned about how this will be implemented. The previous local plan allowed development in areas of relatively high flood risk, such as New Monks Farm and along the Western Harbour Arm, and resulted in direct loss of supporting habitat for the Adur Estuary SSSI. We are particularly concerned about the cumulative impacts of development across the plan area on flood risk and therefore the need for hard engineered flood defences over opportunities for nature-based solutions.

With the flagship Sussex Kelp Recovery Project off the coast and the Adur shoreline peppered with internationally important vegetated shingle, is it also imperative that the pressures from the terrestrial environment that flow out to sea are not forgotten in the drive for housing numbers, and we highlight that the impact reaches far beyond their physical footprint.

Section 6 - Air

How important do you feel these issues are for the Adur Local Plan area?

Select 1-5

Are there other key issues we have not identified?

No response

Section 7 - Biodiversity

How important do you feel these issues are for the Adur Local Plan area?

Select 1-5

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Are there other key issues we have not identified?

The Sussex Wildlife Trust is concerned about the passive language used in this section of the survey in relation to BNG. There is a mandatory legal requirement to achieve at least a 10% BNG on all eligible development. This should be the baseline, the absolute minimum, when it comes to considering the new plan. We are disappointed to still see reference to 'no net loss', when local and national policy and legal requirements have come much further than this. We note that the consultation document does refer to protecting, restoring and enhancing biodiversity, so it is not clear why this hasn't been reflected in the questions for the survey.

Given how much existing habitat within the plan area has been squeezed during the last plan period and the challenges that ADC are facing in relation to climate change, SWT would like to see a BNG policy target of 20% in the new local plan. This would be in line with other more urban local plans, such as the Worthing Local Plan.

We are also concerned that the consultation document refers to 11 Local Wildlife Sites within the local plan area. We do not believe this is correct and think this figure actually relates to Adur District, including the area covered by the South Downs National Park Authority's local plan. In reality there are only a small number of designated sites within the plan area and therefore it is imperative that these sites are protected and enhanced. In particular, there must be strong policy wording to ensure no loss to locally designated sites. It is also vital that the areas of biodiversity value outside of these designations are protected and enhanced and that strategic ecological networks are properly considered as part of the emerging plan.

Again, we reiterate that ADC should be creating a robust environmental evidence base in advance of the local plan to ensure that nature's recovery is prioritised alongside development. We would refer you to our previous comments around green infrastructure and the Urban Greening Factor. Whilst SWT acknowledges the value of trees in urban locations, ADC should also recognise that the plan area is on a coastal plain where chalk grassland, vegetated shingle and estuarine habitats are of greatest importance.

It is imperative going forward with this plan that ADC recognises the wider impact a development can have on the natural environment in the district. The development that is now enveloping the edges of the SSSI between the railway bridge and the A27 has resulted in the direct loss of supporting habitat for the SSSI. This has clearly resulted in the loss of high tide roosting areas for birds using the SSSI and, as the consultation document acknowledges, contributed to the SSSI now being in unfavourable declining status for its designated features (wading birds and intertidal mud).

In addition to the loss of supporting habitat, the natural environment is under pressure from recreational disturbance. The beauty of some of the district's protected sites, including Adur Estuary and Shoreham Beach, brings in more people that want to enjoy them. Whilst SWT supports access to nature, ADC also has a responsibility to ensure there are sufficient resources to raise public awareness and perceptions to protect these areas. We would like to see the council think innovatively in this plan-making process to determine how funds might be raised via developer contributions to address pressure on the natural environment within the district. We recognise that pressures on Council budgets are growing, but that does not mean that the environment should fall down the agenda, especially when so many people living within the district will be needing to access the beaches, estuary and parks to deal with the pressures of everyday life.

In our experience, developer contributions and requirements in relation to mitigation and compensation for loss of estuarine habitats, including salt marsh, have not been implemented fully and therefore there has been a loss to biodiversity over the previous plan period. This needs to be acknowledged and rectified moving forward.

We would like ADC to analyse the policies within the current local plan and look at where there have been challenges in implementing the positive requirements around biodiversity. Given the urban nature of the plan area, there is great potential to include nature and climate change friendly design policies around SuDS, lighting, butterfly banks, swift bricks and hedgehog highways for example. We would like to see specific policy wording in the plan around requirements for nature positive development.

SWT would also be interested to see the outcomes of the 'call for green sites' undertaken in 2022 and ask whether any of these sites could be taken forward as part of the ecological network/green infrastructure in the new plan.

Section 7 - Landscape

How important do you feel these issues are for the Adur Local Plan area?

Select 1-5

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Are there other key issues we have not identified?

The Sussex Wildlife Trust strongly supported the use of green gaps in the current plan, and we want to see these continue in the new plan. These gaps have huge value in not only minimising coalescence, but also acting as supporting habitat for wildlife that has been displaced from other

areas of the district due to development and for providing climate resilience in a heavily constrained coastal area. Again, we recommend that ADC produces a robust evidence base to demonstrate what benefits these gaps have delivered in the previous plan period and to assess how they may perform into the future.

The allocation for New Monks Farm in the current local plan included a requirement for a country park. Although the resulting development has failed to deliver the minimum size requirements required in the policy, SWT recognises that this is now a much-enjoyed resource with the barn owls that were already present on site, now visible for members to the public to enjoy. The emerging local plan must protect this site and prevent any encroachment from further development. In particular, we ask whether the site has been formally designated as a Country Park, and if not, request that this is progressed.

Section 8 - Soils

How important do you feel these issues are for the Adur Local Plan area?

Select 1-5

Are there other key issues we have not identified?

No response

Section 9 - Water

How important do you feel these issues are for the Adur Local Plan area?

Select 1-5

5

Are there other key issues we have not identified?

The Environmental Key Facts in the consultation document state that 'East Worthing WwTW has had some of the highest incidents of sewer collapses, rising main bursts and internal sewer flooding in the catchment.' There are also a number of issues with WwTW spills throughout the plan area. It would therefore be helpful for the local plan background information to set out what steps Southern Water are taking to address these issues and what impact their work may or may not have on the capacity for further development in the plan area.

We are really pleased to see the consultation document state that the local plan can play a key role in improving the quality and ecology of our coastal and estuarine waters and offer opportunities to restore wetland habitats. Many of our previous comments in relation to the need to identify, map and safeguard ecological networks as part of the local plan process are of relevance here. We also reiterate the need to consider the impacts of the development resulting from the current local plan in terms of loss of habitats, coastal squeeze and hard engineering. It would be helpful to see examples of where development has delivered positive water quality features such as SuDS or new wetland habitat. It is also important to recognise where the blockers to delivery of these features have occurred.

Section 10 - Cultural Heritage

How important do you feel these issues are for the Adur Local Plan area?

Select 1-5

Are there other key issues we have not identified?

No response

Section 11 - Economy

How important do you feel these issues are for the Adur Local Plan area?

Select 1-5

4

Are there other key issues we have not identified?

Please note that the comments relating to development in previous sections also apply for non-residential uses. For example, we would expect employment development to achieve a 20% BNG and deliver green infrastructure. Additionally, some of the development that has come forward via the current local plan which has had negative impacts on the SSSI and biodiversity in general is employment development.

Section 12 - Final section

Are there any other topics or issues that the Local Plan ought to contain?

The Sussex Wildlife Trust supports a plan-led process and is keen to see ADC produce a plan that contributes to nature's recovery and ensures that wildlife and people in the district are able to adapt and thrive in the face of climate change.

Overall, we are concerned that the 'Key Issues' Consultation Document doesn't provide any analysis of the existing local plan or what the key outcomes of its implementation have been. It is vital that ADC looks at the plan and considers which elements, and particularly policy wording, have been successful and where there have been challenges, barriers and failings. Without this consideration, it is very difficult to give practical commentary on any emerging local plan.

For example, the current local plan includes some positive policy wording for the environment. SWT was supportive of this during the plan preparation and worked with ADC and statutory agencies to get it through the examination in public. However, it is clear that over the coming years, there has been a failure to deliver the supporting environmental evidence promised in the plan and that a disconnect between elected members and the policy commitments for the environment have resulted in planning decisions that were ultimately damaging for the local environment. We urge ADC to think not only of the formulation of a local plan, but its true integration into the decision-making process and connection with those elected members directly involved with the determination of applications.