



Date: 8 May 24

This response was submitted online through the Arun Consultation Portal

VISION & OBJECTIVES QUESTIONS

1. Do you broadly support the proposed Vision?

No – The Sussex Wildlife Trust is concerned that the vision does not commit to a district where nature is in recovery and biodiversity is protected and enhanced. We are pleased that the vision includes a commitment to a district that is resilient to the impacts of a changing climate, however nature’s recovery is key to delivering this ambition. There is also no mention of the River Arun, despite this being a key feature of the district. Improving biodiversity is a key part of the environmental objective of achieving sustainable development (NPPF paragraph 8) and as such SWT would suggest that more positive wording is included around nature’s recovery. For example:

... all generations will live securely in the years to come. Local people will enjoy rich heritage, diverse culture and leisure **in a place where nature is in recovery and species declines have been halted**. They will achieve more sustainable...

CLIMATE CHANGE QUESTIONS

6. Are there any issues or challenges that we have missed?

We agree with the challenges listed in 4.7 to 4.13 and strongly support the reference to using nature based solutions to mitigate and adapt to climate change. Regarding flooding and sea level rise, the council will also have to consider whether existing infrastructure will need to be moved as our coastline changes. In this situation, there will be a need to safeguard areas for future movement and designation of Coastal Change Management Areas are likely to be required.

7. Do you agree with the proposed policy options?

We support the options set out in this section. We particularly support the option of securing the most stringent energy efficiency and water standards applicable at the time. It should be made clear that these standards are a minimum and that developers can choose to go further.

We also strongly support the options to consider policies to create more innovative solutions to managing surface water and coastal erosion, particularly through the use of multifunctional SUDS and nature-based solutions. This should be a requirement of the new plan, along with policies that improve resilience to extreme events, including flooding.

8. Do you disagree with any of the options?

We are concerned about proposals for hard engineered options in the vicinity of the River Arun/the coastline. Any infrastructure needs to be resilient to climate change and likely sea level rise and should be a last resort after other more natural options to hold onto water and increase water efficiency have been exhausted. Desalination is energy intensive and creates toxic outputs that can have significant negative impacts on marine environments.

9. Are there any other policy options we should be considering?

SWT would like to see reference to encouraging regenerative farming and protection of soil health in the district in relation to climate change. Given the importance of the River Arun in the Weald to Waves Nature Recovery Corridor, the plan could also support landscape scale approaches to nature recovery and therefore climate change mitigation and adaptation. We acknowledge that these areas are covered by the 'our environmental life support network' section, however we feel that the link to climate change should be made.

10. Do you have any other comments in relation to how we can plan to combat climate change?

It is useful for the DoT document to set out what the adopted Arun Local Plan is already doing. However, it would be more useful for the council to set out how effective the current local plan policies have been in delivering policy objectives. For example, how many major developments in Arun meet the requirements for 10% renewable energy provision? Is there potential for this requirement to be higher? Similarly, has the current local plan successfully started a sustainable transport modal shift? Are there examples of developments that have reduced the need to travel? It is not clear if this information is readily available.

OUR ENVIRONMENTAL LIFE SUPPORT NETWORK QUESTIONS

11. Are there any issues or challenges that we have missed?

We feel that the issues and challenges should acknowledge that there is a need to recover nature in the district. It is important to acknowledge the key mechanisms for this, such as BNG, protecting habitats and species and corridor connectivity, but we feel there is a lack ambition in terms of the landscape scale recovery that is required if we are to combat the biodiversity and climate emergencies.

12. Do you agree with the proposed policy options?

Again, it is hard to know what policies should be kept when there is no information on how effective the existing policies have been. SWT supports the objective of delivering above the minimum 10% BNG and would support a more ambitious policy option of 20% BNG. This has been adopted by other local planning authorities and shown to be viable in other counties. Given that the UK is one of the most nature depleted countries in the world, ambition around nature's recovery is needed.

We support policy options that promote nature based solutions, delivery of the priorities within the forthcoming local nature recovery strategy and policies that strengthen and add to wildlife corridors. Any policy around increasing canopy cover and tree planting should also consider natural regeneration and the concept of the right tree in the right place. We recommend that the Woodland Trust's policy asks for trees and woodlands are adopted.

14. Are there any other policy options we should be considering?

SWT believes that the plan should include a specific policy setting out how Pagham harbour SPA will be protected and enhanced through the planning system. We encourage you to take advice from the RSPB on this, but this should include the protection of functionally linked land and consideration of hydrological impacts of development in the vicinity of the SPA. We do not believe that the current policy ENV DM2 is sufficient in this regard.

We would like to see strong policy wording that explicitly safeguards locally designated sites in line with NPPF paragraph 185 and Planning Practice Guidance (Ref ID: 8-013-20190721). Along with a requirement for up-to-date ecological surveys to inform planning applications.

15. Do you have any other comments in relation to how we can plan for our environment?

SWT would like to see a strong ecological evidence base informing the local plan and particularly site allocations. In particular, an assessment of the likely spatial impact of policies and allocations. An estimation of the number of offsite BNG units that are likely to be required over the plan period would be useful. We would also like to see preliminary ecological appraisals of strategic sites as was done by Worthing Borough Council for their local plan update.

HOMES IN THE RIGHT PLACES QUESTIONS

17. Do you agree with the proposed policy options?

We note the acknowledgement of the consequences of not meeting the local plan housing numbers on Arun residents (para 6.9). However, we ask if the council has assessed the impact of unachievably high housing target on the delivery of truly sustainable housing and housing of the type and tenure needed by residents? The presumption in sustainable development could mean that under-delivery tends to lead to approval of applications that do not deliver the types and standard of development actually needed and erodes greenfield. The council should be considering the realistic capacity of the district to absorb new housing whilst delivering the other requirements of sustainable development.

We support the use of policy options that ensure new developments set exemplary standards in contributing towards achieving zero carbon homes and nature's recovery. We also support the concept of 20 minute neighbourhoods and the need for a modal shift towards active travel as the norm.

ECONOMY, HEALTH & WELLBEING and TELECOMMUNICATIONS & DIGITAL INFRASTRUCTURE QUESTIONS

22. Do you agree with the proposed policy options?

SWT supports including policies that integrate blue and green infrastructure as multi-functional networks, serving biodiversity and health and wellbeing.

23. Do you disagree with any of the options?

SWT objects to the inclusion of any policy supporting or safeguarding an offline bypass for the A27 at Arundel.

PLACEMAKING, HERITAGE & CULTURE QUESTIONS

27. Do you agree with the proposed policy options?

SWT supports the concept of 'building up' rather than 'building out'. Any consideration of revisions to strategic gaps must consider that value of these gaps as part of the district's wider ecological network.

We support the inclusion of policies that promote the integration of nature recovery and nature-based solutions into placemaking.