

Contact: Conservation Team

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Date: 8 July 26

By email only

planning@adur-worthing.gov.uk

FAO Gary Peck

Dear Mr Peck

Planning application reference: AWDM/0737/26

Description: Commercial use of regenerated land, including use as a community green space for recreational and leisure use. Retention of land for biodiversity use. Bore hole for extraction of natural water. Use of land to produce natural green energy, for example solar. Provision of vehicle parking use (including overnight camping use for kite surfers and sea swimmers), 2 x 6m flag poles, provision of food and drink from temporary structures, mobile toilets, shower and baby changing facilities. Two recessed shipping containers for site storage and use. Tree shaded sandpit and tumble-down mound for young children and toddlers to use. Animals to use for entertainment purposes, for example Shetland ponies. A decorative flowerpot boat at site entrance. Bin storage use. A wheeled advertising trailer, measuring approx. 5 metres by 2.5 metres located within the site boundary to promote Worthing, local events and tourism

Location: Land South East Corner Of Amberley Drive, Marine Drive, Worthing, West Sussex

The Sussex Wildlife Trust (SWT) **objects** to the above planning application.

The application site sits within the Goring and Ferring Gap Local Wildlife Site (LWS). The Local Wildlife Site citation description states:

Goring and Ferring Gap LWS is located by the Sussex coast and provides a break in the Worthing conurbation separating the areas of Goring and Ferring. It is dominated by arable fields, but also contains grassland, plantation woodland and scattered trees. The site is important for birds with 106 species recorded over the last ten years, which represents over 25% of the total number of species ever recorded in Sussex. It is particularly important for wintering and passage birds, with the fields in the south west corner of the site regularly providing an important roost site for gulls and waders. Parts of the site are accessible for the public to enjoy nature and a local volunteer group is actively involved in managing the woodland in the east of the site.

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As one of the only un-lit, undeveloped coastal greenspaces from the west of Littlehampton to the east of Brighton & Hove, the LWS is of immense value to migrating wildlife, particularly birds. The application documents do not appear to acknowledge the designation or consider the potential impact of the proposals on it. This is contrary to policy DM18 of the Worthing Local Plan:

a) Planning applications should be supported by relevant environmental information, which is informed by appropriate up-to-date ecological information, prior to determination

and:

e) Proposals for development in, or likely to have an adverse effect (directly or indirectly) on a Local Wildlife Site, wildlife corridors, stepping stones or Local Geological Site will not be permitted unless it can be demonstrated the benefits of the proposal outweigh the need to safeguard the nature conservation value of the site/feature. Where an exception is considered the mitigation hierarchy will apply.

Goring Gap has also been designated as an Area of Particular Importance for Biodiversity (APIB) in the West Sussex Local Nature Recovery Strategy (LNRS). The first principle of the LNRS is 'In our core areas for nature, hold on to what we have and make it better'. This means protecting APIBs from degradation and loss and working to improve habitats.

SWT notes the Green Space – Wildlife Additional Statement submitted by the applicant. The map included in the statement has been taken from a constituency narrative we produced to help inform MPs about the areas important for wildlife in their constituency. The map includes a legend which clearly shows that the application area is covered by a 'local designation' i.e. is designated as a Local Wildlife Site and therefore as substantive nature conservation value. We would like to clarify that SWT has not been consulted on this application and that this site is considered important for wildlife.

Overall, we cannot see that any consideration has been given to the impacts of the development on the designated site, contrary to planning policy.

Yours sincerely

Jess Price
Conservation Officer
Sussex Wildlife Trust