From: Price, Jess
Sent: 23 September 2019 10:14
To: peter.barnett@adur-worthing.gov.uk
Subject: Friends of Shoreham Fort WWI Memorial Training Trench Project - AWDM/0567/19 - Land North of Shoreham Fort

Flag Status: Flagged

Dear Peter

Thank you for supplying me with the Preliminary Ecological Appraisal (PEA) and Construction Methodology. Whilst the Sussex Wildlife Trust (SWT) is pleased that ecological information has now been provided, we are still concerned about the potential impacts on the Local Wildlife Site (LWS) and in particular the vegetated shingle priority habitat.

We note that Table 7 of the PEA states that the development site does not contain any rare plant communities. Whilst we note that the species list in section 3.6 indicates that the vegetated shingle is not the best quality, indicator species were still noted, such as sea kale. This was despite the sub-optimal timing of the survey. Therefore, whilst it may be degraded, we would still constitute this area as priority habitat and disagree that the loss of this area and replacement with semi-improved grassland should be seen as a neutral impact (Table 7). We also disagree with the statement that if the barely vegetated shingle is replaced with well managed semi-improved grassland this will produce and increase in invertebrate biodiversity. This does not appear to consider the specialist suit of invertebrate species that benefit from vegetated shingle habitat.

SWT is concerned that by using soil to build up the banks (along with shingle) which is then seeded with grass will create habitat that will easily encroach into the surrounding shingle habitat. As stated previously, we are not oppose to the application, however we do not support the structure being seeded with grass and managed as semi-improved habitat which is not the primary reason for the LWS designation. We ask that the applicants try to deliver the aspirations of their heritage project whilst recognising the value of the LWS and its internationally rare vegetated shingle habitat.

SWT is not clear why enhancements are listed as 'not applicable' in Table 7 of the PEA. Paragraph 170 of the NPPF is clear that development must provide net gains to biodiversity. Given that the PEA states that the site is somewhat degraded, this should not be hard to achieve. Additionally, we are concerned that there is no mention of invasive vegetation such as Red Valerian, which we are aware is a problem on the site.

SWT would like to see more ambition to produce net gains for biodiversity on site by removing areas of compacted soil, removing invasive plants and using shingle with appropriate planting for the banks. This could be a selection of low growing species such as sea kale, starry clover and sea pea so views are not impeded.

We would also like some clarification over the methods of construction and aftercare. It is not clear if the work as described in section 5 of the Construction Methodology is being done by hand or machinery? If machinery is involved, then it needs to be made clear how compaction of the surrounding shingle will be avoided. Similarly if material is going to be collected when the site is scraped flat, this should not be piled on another area of shingle where it could cause compaction. Finally, information should be provided about how the site will be maintained to ensure the vegetated shingle thrives on and around the development inline with aspirations and policies of the Adur Local Plan.

Kind regards

Jess Price
Conservation Officer
Normal working days Tuesday - Friday


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