Contact: Charlotte Owen
E-mail: swtconservation@sussexwt.org.uk
Date: 9 January 25

By email only
FAO Peter Barnett
planning@adur-worthing.gov.uk

Dear Peter,

Planning Application Reference: AWDM/1363/24
Description: Construction of a new rock revetment along the existing defence along the central Shoreham frontage facing Basin Road South. The proposed alignment follows the seaward perimeter of the existing beach crest. Construction of a new footpath along with a new beach access ramp and steps. Application to vary Condition 1: Proposed change to design of rock revetment, changes to biodiversity enhancement and compensation proposals and additional details of ramp, steps and footpath provided and Condition 5: for its wording to be varied to a compliance condition in line with the plans submitted with this application in relation to the steps, footpath and ramp of approved AWDM/0321/23
Location: Land South of Lorry Park and Adjoining Edge Of Beach, Basin Road South, Southwick, West Sussex

Thank you for consulting the Sussex Wildlife Trust on updated documents relating to the above application:

- BHCC-JBA-00-00-RP-EN-0015-S0-P02-Area_2a_and_Area_4_BNG_Justification_Report
- BHCC-JBA-00-00-RP-EN-0016-S0-P02-Area_2a_and_Area_4_Ecological_Design_Strategy
- BHCC-JBA-00-04-RP-EN-0003-A1-P02-Area_4_EDMMS
- BHCC-JBA-00-00-RP-EN-0014-S0-P03-Area_2a_and_Area_4_EcIA_Report

The changes made to each document have not been identified or highlighted but include amended figures for coastal vegetated shingle.

The BNG Justification Report shows Table 1.1 '*Comparison of approved compensatory habitat vs proposed for the Section 73 update*' with modified values for Carat's Café, which previously had an approved area of 0.16 ha compensatory habitat. This figure has now been deleted, reducing the total approved compensatory habitat to 0.31 ha, and it is unclear why this deletion has been made. We previously raised concern about the disparity between approved (0.46 ha) and proposed (0.32 ha) compensatory coastal vegetated shingle habitat. Deletion of the 0.16 ha figure from Carat's Café in Table 1.1 closes this gap on paper, however without further clarification or justification for this deletion we remain concerned over the reduction in proposed compensatory habitat.

The updated reports list a permanent loss of 0.11 ha 'existing shingle beach' in Area 1 (0.01 ha) and Area 2 (0.10 ha) but it is not clear whether these areas are coastal vegetated shingle habitat. There is no proposal to compensate for this permanent loss.

Working on a stated permanent loss of 0.03 ha coastal vegetated shingle in Area 4 (Basin Road South Local Wildlife Site), the proposal is to compensate for this loss primarily by enhancing existing coastal vegetated shingle habitat (0.285 ha total) rather than creating new coastal vegetated shingle habitat, which is limited to

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0.038 ha. The stated compensation ratio of 8:1 is based on area i.e. quantity/extent of coastal vegetated shingle and on this basis, it is not being achieved since only 0.038 ha additional habitat is being created.

Enhancing existing habitat, though clearly beneficial, is not necessarily equivalent to creating new habitat and changes to quality cannot be measured or compared by area alone – for example, 0.22 ha of existing coastal vegetated shingle will be enhanced from poor condition to moderate condition; and 0.065 ha from moderate to good condition. Combining measures of habitat quantity/extent with habitat quality/condition reduces clarity and may not be appropriate. We therefore query whether the area of proposed habitat enhancement should be included when calculating the 8:1 ratio.

Overall, as currently presented, the figures do not present a clear enough picture for us to be confident that the 8:1 compensation ratio will be delivered.

Yours sincerely,

Charlotte Owen
Conservation Manager