



SUSSEX ORNITHOLOGICAL SOCIETY

Registered charity 256936

www.sos.org.uk

Beavers Brook,
The Thatchway,
Angmering,
West Sussex BN16 4HJ

27 August 2020

By email only

gary.peck@adur-worthing.gov.uk

Dear Mr Peck,

Planning Application AWDM/1264/20 – Land North West Of Goring Railway Station
Goring Street Worthing West Sussex

The Sussex Ornithological Society (SOS) is the county bird club and with 1900 members we are one of the largest county Bird Clubs in Great Britain. We record the birds seen in Sussex and have a database of over 5 million records of birds in the county. We publish the 250-page Sussex Bird Report annually plus periodic avifauna documenting the state of birds in Sussex – our last was The Birds of Sussex, edited by A Thomas and published by BTO in 2014. Our Recorder and the SOS Records Committee determine whether records of designated “description” (rare) species that are not handled by the British Birds Records Committee should be accepted and entered into our database of birds recorded in the county, or be considered not proven. We actively work to protect birds and their habitats in the county. More details about us can be found on our website www.sos.org.uk.

Whilst we believe that there are several issues surrounding this planning application we will confine our comments to its impacts on birds, since that is our area of expertise.

1. We believe that the Breeding Bird and Winter Bird surveys have been carried out to a high standard and we have no additional records of birds to add any worthwhile information to that contained in these two reports.
2. The breeding bird survey assesses that the site is “Locally Important” for birds, as it estimates that 10 pairs of Skylark nest on the area between the railway track and the A259 (of which six pairs nest on the development site itself) and good numbers of House Sparrow are found along the southern and south west boundary.
3. In 6.4.1 the Breeding Bird Survey makes 10 recommendations “*for the avoidance and/or mitigation of impacts to breeding birds, to prevent an offence under the relevant legislation from occurring and to reduce the risk of development proposals impacting on the populations and distribution of species recorded during the survey*”.

We agree with all 10 recommendations and would like to see them all implemented.

4. An important recommendation is number 4: *Create high quality breeding habitat for Skylarks, comprising appropriately managed permanent grassland with a variety of structures and heights. Land within the applicant's control in the local area can offer a suitable alternative habitat for skylarks. As far as possible, alternative habitats should be managed to reduce disturbance by people and dogs.*

There is some suggestion that the nearly 5ha's of proposed Public Open Area south of Ferring Rife on the development site will be laid out to provide this habitat. This would not attract Skylark to nest as the purpose of the Public Open Area is that it is to be a recreational area for the residents of the proposed 475 properties. They and their dogs will expect to have free access to all of it all of the time. There is no way Skylark, a ground nesting bird, are going to choose to nest on what will be a very well-used site, however, attractive the habitat is for them. There will just be too much disturbance. Only if humans and their pets are denied physical access to the whole of the Public Open Space (at least from February through July each year) might a few Skylark consider nesting on it – and denying humans and their pets access to this Open Space is clearly not what is intended.

We therefore expect to see the Applicant coming forward with proposals to implement recommendation 4 via plans to provide compensatory habitat at another site away from this development site. We would welcome this being managed permanent grassland with a variety of structures and heights that is free from any risk of disturbance by the public or their dogs. Part of the mitigation proposal might also include the creation of Skylark Plots on fields in which autumn-sown cereal is sown. (Skylark Plots are undrilled plots on winter cereal fields which have been proven to boost nesting opportunities for Skylarks in areas of predominately autumn-sown crops - see http://ww2.rspb.org.uk/images/skylarkplot_tcm9-132769.pdf).

Noting that the Applicant's Breeding Bird Survey makes it clear that the landowner does have suitable habitat "off site", **we ask that a condition of granting outline planning approval should be that proposals to provide full mitigation for the loss of breeding Skylark sites must be provided offsite.**

5. Overall the applicants claim that there will be a substantial net increase in biodiversity as their landscape plans include the planting of 2kms of new hedges within the development as well as the creation of SuDS features. We believe that there is every reason to expect that net biodiversity can be increased as a result of this development, but will want to see detailed proposals which confirm that this will be done in a way that ensures that biodiversity gains will be sustained.

6. Recommendation 10 of the Breeding Bird Survey recommends that nest boxes for each of the following species is included in the full planning proposals: Common Swift, House Martin, House Sparrow, Barn Swallow and Kestrel.

The first two species nest in colonies. We would recommend that a minimum of 5 Swift nests (which could be Swift bricks) be incorporated in the development and we would also recommend that 5 House Sparrow terraces be erected. We are less convinced that Barn Swallow or House Martin nests should be provided – in part because evidence suggests that the process of these species building their own nests is an important part of their pair bonding. House Martin is also not frequently seen in this area.

We believe that a Kestrel box should also be erected in the greenspace at the north of the site, as recommended in the Breeding Bird Survey (recommendation 10), as this species is regularly recorded in this area.

SOS asks that a condition of granting outline planning approval be that the provision of Swift, House Sparrow and Kestrel nests be part of the development.

We would be happy to provide further advice on these matters.

7. Re recommendations 2 and 5, the Breeding Bird Survey clearly shows the importance of the Rife for breeding and winter birds, and particularly waterbirds. **We therefore ask that a condition of granting outline planning approval is that the applicant should put forward plans to protect and enhance the Ferring Rife corridor for the benefit of birds.**

Yours sincerely,

Richard Cowser
(SOS Conservation Officer)
conservation@sos.org.uk