

# Local Plan Representation

FPLP524809490

## PART A Personal details

Title	
First name	
Last name	
Organisation	Sussex Orn th o g ca Soc ety
Is the address	
Flat name or number	
House name or number	
Street	
Town	
County	
Postcode	
Email	
Confirm email	
Mobile number	
Has a planning agent been appointed?	No

## PART B Your representation

Which document would you like to make a representation on?	Craw ey subm ss on Loca P an
Which part of the Local Plan does this representation relate to?	Po cy
Please give details.	Po ces CL8 and CL9 and paragraphs 2.30 - 2.33
Legally compliant?	Yes
Sound?	No
Compliant with the duty to co-operate?	No
Please give details explaining your response.	<p>1. The Sussex Orn th o g ca Soc ety (SOS) s the county b rd c ub. We promote the record ng, study, conservat on and enjoyment of b rds n Sussex. We have over 1900 members and a database of seven m on b rd records n Sussex. Protect on of natura hab tats w th n and south of Craw ey: â€ Deve opment adjacent to Craw eyâ€™ paragraphs 2.30 - 2.33 and Po ces CL8 and CL9 2. We be eve that the p an s unsound n (a) propos ng to a ow or support deve opment n the H gh Wea d Area of Outstand ng Natura Beauty (AONB) n the Borough and beyond, contrary to the requ rements of the Nat ona P ann ng Po cy Framework (NPPF) paragraphs 176 and 177, (b) n fa ng to have dent fed and safeguarded eco og ca networks as requ red by paragraph 179 (a) of the NPPF; (c) n deferr ng cross-boundary strateg c matters that shou d have been addressed n the p an, and (d) n not comp y ng w th the NPPF requ rement for an env ronmenta object ve that protects and enhances the natura env ronment. 3. Our pr nc pa concern s that the p an s open to a ow ng or support ng further deve opment that wou d remove green space and w d fe hab tats n the H gh Wea d Area of Outstand ng Natura Beauty (AONB), and n undeve oped areas n the south of the Borough n the T gate area. An acceptab e oca p an shou d make c ear that the NPPF requ rements n re at on to AONBs w be fu y respected and that AONBs are an asset, not a constra nt. Th s p an eaves open the poss b ty of res dent a or other deve opment anywhere n the AONB and mp es that the Council m ght support such deve opments de vered by ne ghbour ng Council s. V rtua y no and s ru ed out: referr ng to the map on page 26, the text states â€œTh s map shou d not be cons dered as an nd cator of the extent of acceptab e deve opment adjacent to Craw eyâ€ . Th s word ng makes t mposs b e for those comment ng on the p an to understand ts scope. The NPPF test of effect veness requ res p ans to be â€œbased on effect ve jo nt-work ng on cross-boundary strateg c matters that have been dea t w th rather than deferredâ€ and n th s respect the p an fa s the test of soundness. 4. In h s etter of 2 March 2020, R chard Cowser of the SOS prov ded comments under</p>

the Regu at on 19 consu tat on process for th s p an. Append x 1 to that etter prov ded extens ve data and ev dence n support of our v ew there shou d be no further deve opment n the H gh Wea d Area of Outstand ng Natura Beauty (AONB). 5. Th s areaâ€™s br d fe adjacent to Craw ey s not d ss m ar n ts su te of spec es to the New Forest, wh ch s a Spec a Protect on Area for br ds. We cannot mag ne that oca p ans n areas adjacent to the New Forest wou d make no ment on of the mportant of safeguard ng that env onment and the eco og ca network nks to the p an area. 6. Our etter of 20 March 2020 ment oned Honey-buzzard Pern s ap vorus, Br ta nâ€™s rarest regu ar y breed ng br d of prey, for wh ch Sussex ho ds the argest popu at on of any county n the UK. Pa rs are present very c ose to Craw ey and one s te s now at ser ous r sk from further res dent a deve opment n or adjacent to the south s de of the Borough. These br ds a so use the T gate wood and and green space, some of wh ch Craw ey BC fee s shou d be open to deve opment (Po cy CL8, page 60), even though t s the on y arge rema n ng green space w th n the Borough. Lesser Spotted Woodpeckers Dryobates m nor, a Schedu e 41 Red sted spec es whose popu at on has fa en by 91% s nce the 1960s, a so occur n T gate Forest and adjacent parts of the AONB. These are just two examp es of threats to br d fe. S m ar cons derat ons app y to the wood and and other green space n the Buchan Forest area, wh ch Po cy CL 8 appears to earmark for poss be deve opment. 7. The Craw ey Loca P an as now proposed for subm ss on does not suff c ent y recogn se the Counc â€™s duty to safeguard the eco og ca networks that cross the boundar es of the Borough nto adjacent Counc areas. Loca or off-s te mt gat on measures are seen n the p an as the remedy for any poss be oss of bod vers ty, a ongs de bod vers ty net ga n measures, but these w not be effect ve where the goa shou d be to preserve the ntegr ty of a arge, connected ecosystem. In th s regard, we cons der that the p an s unsound n not comp y ng w th the NPPF requ rement for an env onmenta object ve that protects and enhances the natura env onment. 8. Some of the same cons derat ons app y to and west and east of Craw ey, nc ud ng the proposed western re ef road. There s no ev dence n the p an of work done to dent fy w d fe-r ch hab tats, w der eco og ca networks and w d fe corr dors as requ red by the NPPF paragraph 179 (a). The â€œarea of searchâ€ for the proposed western re ef road s vague, but t cou d mater a y affect one or more Loca W d fe S tes (LWS). As much of the and n quest on fa s under an adjacent Counc , we wou d have expected to see ev dence of co aborat on w th that Counc to address these eco og ca ssues w th n the NPPF duty to cooperate requ rements. No such act on appears to have been taken and th s a so renders the p an unsound n term of the NPPF.

**Please set out what modification(s) you consider necessary to resolve the issues you have identified above.**

These concerns wou d be addressed f (a) the Counc were to ru e out any further deve opment south of the A264 and M23, whether w th n the Counc boundar es or beyond, nc ud ng any extens on to the Pease Pottage deve opment south of the M23; and any deve opment w th n the T gate area of the Borough where th s s current y green space, much needed by the townâ€™s res dents and by ts w d fe; and (b) n re at on to paragraph 8 of my subm ss on, bu d ng an understand ng of hab tats and w d fe n these areas and act ng on that know edge.

**If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings?  
Form submitted by:**

No, I do not w sh to part c pate n the exam nat on hear ngs

on 18/06/2023