



The countryside charity
Sussex

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FAO: Maria Seale: Case Officer
City Planning & Development
Brighton & Hove City Council

planning.consultation@brighton-hove.gov.uk

14 February 2022

Dear Ms Seale,

CPRE Sussex representation in response to

BH2018/03633

Land At King George VI Avenue (Toads Hole Valley) Hove

Outline application for a mixed use development comprising residential dwellings (C3 use); land for a 6-form entry secondary school (D1 use)/community sports facilities (D2 use); office/research/light industry floorspace (B1 use); neighbourhood centre including retail outlets (A1-5 uses), a doctors' surgery (D1 use) & community building (D1 use); public open space (including food growing space & childrens play space), enhancements and alterations to the Site of Nature Conservation Interest (SNCI); & associated landscaping. Provision of 3no. vehicular accesses onto King George VI Avenue (unreserved) with associated highway alterations. [Additional Information to Environmental Statement Nov 21]

Concerns, Comments and Questions

Biodiversity Net Gain

Brighton and Hove City Plan Part One Policy CP10 and City Plan Part Two Policy DM37 stipulate that a net gain in Biodiversity be achieved by 'all development'.

Considering the Environment Act, the net gain in biodiversity should be at least 10%, and we suggest that the council consider setting a higher target for the scheme.

We are concerned because, apparently, a Biodiversity Net Gain target has not been set for this application.

We therefore ask that the level of demonstrable Biodiversity Net Gain that can be achieved by the scheme, **if any**, be assessed, and determined as a matter of urgency.

To promote, enhance and protect a thriving countryside for everyone's benefit

President: Lord Egremont

Campaign to Protect Rural England Sussex Branch CIO | Registered charity number: 1156568

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Guidance given under the heading 'How can biodiversity net gain be achieved?' in Natural England and Defra 'Guidance Natural environment Explains key issues in implementing policy to protect and enhance the natural environment, including local requirements', that

'Care needs to be taken to ensure that any benefits promised will lead to genuine and demonstrable gains for biodiversity. Discussions with local wildlife organisations can help to identify appropriate solutions, and tools such as the Defra biodiversity metric can be used to assess whether a biodiversity net gain outcome is expected to be achieved. Planning authorities need to make sure that any evidence and rationale supplied by applicants are supported by the appropriate scientific expertise and local wildlife knowledge'.

When assessing opportunities and proposals to secure biodiversity net gain, the local planning authority will need to have regard to all relevant policies, especially those on open space, health, green infrastructure, Green Belt and landscape. It will also be important to consider whether provisions for biodiversity net gain will be resilient to future pressures from further development or climate change, and supported by appropriate maintenance arrangements'.

Paragraph: 023 Reference ID: 8-023-20190721

We note the advice therein to local planning authorities that they 'need to make sure that any evidence and rationale supplied by applicants are supported by the appropriate scientific expertise and local wildlife knowledge'.

Birds of Conservation Concern and Extinction Risk

'The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second International Union for Conservation of Nature (IUCN) Red List assessment of extinction risk for Great Britain' has just been published (December 2021).

The fifth review of Birds of Conservation Concern shows 'a continuing decline in the status of our bird populations in total, 70 species (29% of those assessed) are now on the Red list, up from 36 species in the first review in 1996.

And the second IUCN Regional Red List assessment of extinction risk for Great Britain, shows that 46% of 235 regularly occurring species, and 43% of 285 separate breeding and non-breeding populations, are assessed as being threatened with extinction.

We note that Technical Appendix 5.7 Breeding Birds Final Report October 2018 for the scheme includes and is informed by the results of Breeding Bird Surveys conducted on the site in 2014 and 2016, and by 'desk top research'.

We suggest that the status of these birds be considered against the findings of both the 'fifth review of birds of Conservation Concern' and the second Regional Red List assessment of extinction risk for Great Britain', and measures put in place to protect bird species at risk.

We suggest, too, that consideration be given to fitting proposed buildings and dwellings with bird boxes for house martins and swifts because:

'Many of our aerial insectivores are in trouble. Both Common Swift and House Martin move from the Amber to Red list in BoCC5 owing to severe population declines of 58% (1995 to 2018) and 57% (1969 to 2018) respectively. The former is IUCN Endangered,

the latter Near Threatened. The causes of Common Swift decline are unclear and more robust evidence is needed, but the loss of traditional nest sites is likely to be a contributory factor'.

(The status of our bird populations: the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second ICUN Red List assessment of extinction risk for Great Britain, December 2021, page 740).

Yours faithfully,

Dr R F Smith DPhil, BA Hons, FRGS

Trustee CPRE Sussex

CC Chair CPRE Sussex