

Council response to representations received during Strategic Wildlife Corridors Technical Consultation

1. Proposed inclusion of the Nutbourne to Hambrook Strategic Wildlife Corridor

Support	Object	Comment
26	0	1
Representation		Council response
Corridor is narrow and should be wider		The width of the corridors needs to be based on technical information relating to location and presence of species. The corridor is considered to be functional based on its current width, and it is not considered justified to widening the corridor in the absence of further technical evidence.
Propose a 50m buffer zone around the corridor		The draft policy covers development within or in close proximity to the corridors. This will be assessed according to the specifics of the site. Setting a fixed width buffer would not be justified in all locations.
Suggest joining Nutbourne and Chidham corridors together		The location of the corridors needs to be based on technical information relating to location and presence of species. The evidence does not support the inclusion of the land between the corridors.
Suggest widening corridor to include various pieces of land around Nutbourne and Southbourne		The location of the corridors needs to be based on technical information relating to location and presence of species. The evidence does not support the inclusion of further pieces of land.
Require clarification as to funding available to support the corridor		The Council has recently agreed to release funds from the Community Infrastructure Levy to fund the safeguarding and enhancing of the proposed strategic wildlife corridors.
Would benefit from tree planting and additional habitat creation initiatives		The Council has recently agreed to release funds from the Community Infrastructure Levy to fund the safeguarding and enhancing of the proposed strategic wildlife corridors. Such enhancements will include habitat creation initiatives
Corridor should reflect extent of proposed corridor within the Southbourne Neighbourhood Plan Review consultation document		The corridor as proposed largely does reflect the extent of that as proposed in the Southbourne Neighbourhood Plan Review consultation document. Where the corridor differs is based upon the Council's consideration of the available technical evidence which supports the proposed location.
Corridor crosses majority of extent of breakers yard. Cost of remediation of site to provide corridor would make this site unviable and unlikely to be able to create a		Noted.

functional contribution to the corridor	
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2. Proposed amendment to the route of the Pagham Harbour to Westhampnett Strategic Wildlife Corridor

Support	Object	Comment
7	2	2
Representation		Council response
Suggest corridor is widened to include various pieces of land within the area		The location of the corridors needs to be based on technical information relating to location and presence of species. The evidence does not support the inclusion of further pieces of land.
Need to mitigate against artificial lighting from the A27 and Shopwyke Lakes development which will impact bat routes		The Strategic Wildlife Corridor policy is being proposed after the Shopwyke Lakes development and cannot deal retrospectively with existing impacts. The linked Community Infrastructure Levy funded enhancement project may be able to deliver enhancements outside of the planning system to address these pre-existing impacts.
Suggest retaining existing proposed route as well as proposed amendment in this document		The technical evidence indicates that the proposed route has stronger presence of habitats and species (particularly for bat species) and would make a better contribution to the integrity and function of the corridor.
Edges of proposed route do not follow logical situation on the ground		The proposed boundaries are intended to align with habitat types whilst maintaining a minimal width for connectivity at a landscape scale.
Evidence relied on (Barbastelle Bats in the South Downs National Park report) is in draft format, out of date and was in any event available during preparation of Regulation 18 Local Plan Review Preferred Approach. Development has occurred since which may have impacted bats and their commuting routes.		The report is in final form and has since been confirmed by 2021 data showing the same bat species are still using the corridor, despite other development in the area.
Insufficient evidence for inclusion of land to the north of Bognor Road/Drayton Lane roundabout		The Council considers it has evidence to justify the inclusion of this land. The evidence indicates that the former gravel pits at Drayton Lane have significant species and habitat presence, particularly for birds.
Corridor should not include land of very limited or no demonstrable value in order to join habitats together		A non-continuous corridor would not be functional. At all points the proposed corridors contain at least one connecting feature, even if this is in some cases narrow. The discontinuity of such features elsewhere in the landscape has reduced the options available for a functional corridor route.
Evidence based on very low numbers of bats		This is based on a misunderstanding of the radio tracking survey data, only a small

	<p>sample of the total Barbastelle bats were subject to the mildly intrusive tagging technique in order to avoid any possible adverse impacts on the colony. Only 5,000 of this species are found in the whole of the UK, hence it being a UK priority (Section 41) species.</p>
<p>Evidence for woodland area to be included is based on third parties who have not accessed the land and cannot view except from the boundary.</p>	<p>Radio tagging data does not require access to the site to track bats flying over the site. The evidence for bird species has been obtained from the West Sussex County Council depot adjacent. Species present or observable from the garden of properties in Drayton Lane are also applicable to the woodland.</p>
<p>Remove wider part of corridor through AL3 as this would sterilise this area for strategic development</p>	<p>Removing this would sever the link from the South Downs National Park to the Manhood Peninsula, which is an essential part of the functionality of the corridor. The proposed boundaries of the corridor have been amended to reduce the extent across the proposed AL3 site.</p>
<p>Evidence from landowner indicates that the level of bat activity is not at a level that would indicate strategic importance for the species</p>	<p>CDC evidence points to an unusually high level of use by the rare Myotis species of bat and also by two very rare (Section 41 priority) species (Barbastelle and Brown long-eared) These bats are so rare that low number of individuals still result in a regionally significant level of use.</p>
<p>No evidence that bats rely on habitats at Chichester and Pagham Harbours so need for corridor is questioned</p>	<p>The corridor is not only designated for bats. The woodland specialist species are known to roost at Goodwood and travel south to feed. If the woodland in AL3 was removed there are no alternative areas of woodland further south. The link to Pagham Harbour is to allow for other mobile species, including birds, to move across the landscape to find suitable places to breed and feed.</p>
<p>No evidence to support assertion that Sussex Biodiversity Records Centre has nominated Drayton Gravel Pits as a potential Local Wildlife Site</p>	<p>The Council understands that the Sussex Wildlife Trust believes that the site meets the criteria as a potential Local Wildlife Site. However, the Council has not seen any evidence that the site has been nominated as a Local Wildlife Site, and therefore the statement made in paragraph 2.8 of the Consultation Document is not accurate.</p>
<p>The existing route follows existing watercourses passing through open farmland which is a more ecologically preferable route</p>	<p>Although the initially proposed route has continuous ecological features, the evidence indicates that the amended route is used by rare bat species. These species do not use the original route. The high number of bird species in and around the former gravel pits are of greater ecological value than the original route.</p>

<p>No evidence that there is an interchange of bird species between Pagham Harbour and the South Downs National Park – the birds at the Harbour are largely coastal species</p>	<p>As climate change affects northern Europe, species arriving on the south coast from northern France will need functional routes northward, to the South Downs, through the South Downs and then onward from the South Downs still further north. This means terrestrial species that rely on cover for movement as well as those that can fly.</p>
<p>The proposed route would render further land in the area as isolated, which would compromise the opportunity for housing delivery in the area</p>	<p>This is noted, however the proposed corridors have been based on ecological evidence which demonstrates that these routes are host to significant species that require protection.</p>

3. Proposed amendment to the route of the Aldingbourne and Elbridge Rifes Strategic Wildlife Corridor

Support	Object	Comment
6	0	0
Representation		Council response
Suggest retaining existing proposed route as well as proposed amendment in this document		The technical evidence indicates that the proposed route has stronger presence of habitats and species and would make a better contribution to the integrity and function of the corridor.
Corridor would benefit from tree planting and additional habitat creation initiatives		The Council has recently agreed to release funds from the Community Infrastructure Levy to fund the safeguarding and enhancing of the proposed strategic wildlife corridors. Such enhancements will include habitat creation initiatives

4. Representations received that are not specific to any of the above three proposals

Representation	Council response
Suggest creating east-west corridors linking the north-south corridors between Southbourne and Fishbourne	The corridors are intended to link the South Downs National Park with Chichester Harbour, to enable the migration of species between these two designated habitats. At present, it is not considered that justification exists to expand the remit of the corridors to include east-west corridors.
A Flood Risk Activity Permit may be required for some activities to ensure there is no increase in flood risk	Noted.
Suggest corridors linking East Head with Medmerry and Pagham Harbour	The corridors are intended to connect habitats between and within the South Downs National Park and Chichester and Pagham Harbours.
Location of a site within a corridor should not preclude development from occurring on that site	The policy as drafted does not preclude some level of development from occurring within the corridor; however, it is considered that major development within the corridor could have a significant adverse impact upon the presence of and patterns of commuting of species within the corridors, and there is therefore justification to prevent such type of development within these areas.
Concerns over application of sequential test as set out in the policy	Noted and to be considered in redrafting of the policy for the Regulation 19 Pre-Submission plan.
Need to consider any potential impacts arising from the close proximity of corridors to existing development	Noted and to be considered in redrafting of the policy for the Regulation 19 Pre-Submission plan.
Policy should allow new footpaths and cycleways to cross through corridors providing they do not restrict the passage of	Noted and to be considered in redrafting of the policy for the Regulation 19 Pre-Submission plan.

wildlife	
Consultation is premature and should have been progressed as part of and in parallel with the Local Plan Review to ensure considerations are taken in the round.	The consultation exercise was to establish if there was any technical evidence to support the proposed amendments to the corridors. The Council wishes to ensure that it has the most up to date evidence upon which the location of the corridors can be based. Consultation on the plan in the round will be undertaken on the Regulation 19 Pre-Submission plan.
Best way to deliver enhancements to habitat and commuting areas is through new development resulting in physical improvements	Noted. The Council has recently committed to releasing funds from the Community Infrastructure Levy to fund safeguarding of and enhancements to the proposed strategic wildlife corridors.
Policy should include criteria requiring development in close proximity to corridors to protect water quality of streams	Noted and to be considered in redrafting of the policy for the Regulation 19 Pre-Submission plan.
No definition of what constitutes 'close proximity' which means policy is unclear and open to interpretation	Noted and to be considered in redrafting of the policy for the Regulation 19 Pre-Submission plan.