

## Examination of the Chichester Local Plan 2021 – 2039

### Matter 5 – Other Policies

#### Policy NE4 Strategic Wildlife Corridors

Respondent 6219: Mrs Sue Talbot LLB, MRTPI (Retired)

#### Q.120 Are the boundaries of the proposed Strategic Wildlife Corridors justified?

1 This statement provides up-dated evidence confirming my original submission (1) that the Ham Brook Wildlife Corridor should be extended to match the boundary as shown in the made Southbourne Modified Neighbourhood Plan 2014 – 2029 and (2) It is not clear whether the strategic boundaries are definitive or a guideline.

2 The Examiner in considering the Southbourne Modified Neighbourhood Plan 2015 – 2029 was concerned that the Ham Brook Wildlife Corridor area was not properly backed up by convincing evidence (his Question 24) and he asked if there was evidence “from the Local Plan evidence base which would justify the extent of the areas to be covered by this policy in the neighbourhood plan?” (Question 26) (Extract from Initial Comments of the Independent Examiner – Policy SB.13 July 2023).

3 The Parish Council’s response referred to all the reports that had been available as a basis for defining the Corridor area, copies of which were sent to him. It was explained that the difference lay in the interpretation of the evidence, much of which had been collected jointly by the District and Parish Councils.

4 The Examiner in his Report to Chichester District Council on the examination noted that the areas were different and commented that “I need to be convinced that the increased area is justified by evidence. I therefore raised this question in my Initial Comments and sought justification for the extent of the network as is being proposed. I am pleased to say that I received a comprehensive note covering just this issue. That information has satisfied me that the Parish Council has provided evidence to support the larger area. For example, the inclusion of the culvert under the A27 is justified in terms of protecting the integrity of the ecological network and there has also been information provided, identifying priority habitats such as for water voles and Beckstein bats. I am therefore satisfied that the plan has justified seeking to protect a wider area than currently proposed by the local plan, which itself has not been the subject of examination. It may well be that the District Council reflects on the additional evidence presented by the Parish Council and it may wish to revisit its proposals.” (para. 91). This rather fuller quote from his report than that provided by the District Council in its evidence (Strategic Wildlife Corridors Background Paper June 2024, para. 1.1 – Ref BP13), shows why the Examiner supported the larger area. The larger area also received full support from Chichester Harbour Conservancy and the Environment Agency.

5 It is appreciated that the District Council wishes to see consistency in the application of its strategic policy, but all Corridors differ in character, for example some may support large bat populations and others may have few bats but large numbers of water voles. The District Council does not appear to have adopted any criteria/evaluation system to demonstrate consistency in how the areas were selected. However, strategic consistency could be secured by ensuring that all Corridors achieve a practical corridor for wildlife movement ie a successful end-result.

6 Concerns were raised with the District Council about the narrowness of this Corridor at several stages during preparation, not least by the South Downs National Park. In fact, as pointed out by the District in its Background paper (Ref BP 13), the Bat Survey Report Ham Brook by Grays Ecology October 2020 commented that “This study has indicated that the Ham Brook is significantly important to bats and appears to function as an important wildlife corridor for these animals. It serves to connect bats to the protected sites of Chichester and Langstone Harbour on the coastal plain, with the wooded downland of the South Downs National Park to the north. The Ham Brook corridor represents **a narrow and very vulnerable wildlife artery**, which if compromised, even a small way is likely to have a

devastating effect upon bats and the wider ecology within the locality. This would be especially damaging for the protected environments of Chichester and Langstone Harbour.”

7 The larger area included in the Neighbourhood Plan also provides an opportunity for the implementation of the emerging Nutbourne Flood Study (January 2019) (see page 1). The Ham Brook floods on occasion creating serious problems for properties downstream, especially in Nutbourne. The preliminary Study suggests that one means of containing and managing flood water from the Hambrook would be to create one metre deep storage or holding areas upstream of some 4.35 hectares. Further study is required, but such a scheme could fit very well within the north west part of the wider Wildlife Corridor, thereby enhancing habitat for wildlife.

8 The District Council has suggested that the unchanged strategic area should remain in the Local Plan and this would “not preclude parishes from proposing their own local corridors within their neighbourhood plans”. However, Local and Neighbourhood Plans should complement each other to form a single Development Plan providing certainty and clarity. Two different Ham Brook Wildlife Corridor areas would be very confusing. Would they be weighted differently?

9 The Southbourne BLD boundary includes part of the Neighbourhood Plan Wildlife Corridor. It is not known what may be proposed in the north eastern part of the BLD. However, it seems unlikely to be suitable for development as it is remote from services and new building would intrude into the “gap” between Hambrook and Southbourne. Therefore, the BLD could easily accommodate the larger Corridor.

10 In conclusion, there is sufficient evidence to designate a larger and more robust area around the Ham Brook as shown in the Neighbourhood Plan. Not least, the wider area includes a water vole network in the small chalk streams that discharge into the Ham Brook. The purpose of the Corridors is to facilitate wildlife movement and the larger Corridor includes an additional culvert under the A27, thereby significantly enhancing opportunity for wildlife movement across (under) the barrier created by the A27.

ST/7.9.24

*NB I would be grateful if the following documents could be made available in the Examination Library. Alternatively, with the exception of the Nutbourne Flood Study, they can all be found on the District Council website under Neighbourhood Planning/Southbourne:-*

*Southbourne Modified Neighbourhood Plan 2014-2029 ( 202)*

*Initial comments of the Independent Examiner 28 July 2023*

*Wildlife Corridors (CDC &SPNP) – map showing comparison of CDC and NP Wildlife Corridor areas*

*Southbourne Parish Neighbourhood Plan 3 – Wildlife Corridors Appendix Final (Parish Council’s response to the Examiner)*

*Southbourne Parish Modified Neighbourhood Plan 2014 – 2029 Final Southbourne Report (24 October 2023) A Report to CDC on the Examination of the SPMNP – John Slater (Examiner)*

*Nutbourne Flood Study – WSP 9 January 2019 (I understand that Southbourne Parish Council has a copy and will be arranging for this to be included in the Examination Library)*

*The comments on the larger Wildlife Corridor submitted by the Chichester Harbour Conservancy and the Environment Agency are held by the Parish Council*