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**Examination of the Chichester Local Plan 2021-2039**  
**Response to Matter 5: Other policies**

[Policy NE3 Landscape Gaps between settlements](#)

Q.115 Policy NE3 seeks to protect gaps between settlements. Landscape gaps are not identified through this Plan, and instead are intended to be identified in a Site Allocations DPD or Neighbourhood Plans. Is Policy NE3 consistent with national policy, justified, clearly written and unambiguous, so it is evident how a decision maker should react to development proposals, and would it be effective?

- The boundaries of Wisborough Green (WG) and Billingshurst (Horsham District) are contiguous, the latter has seen an extraordinary scale of housing and commercial development, though not concomitant retail, and the proposals for further housing effectively reach the WG parish boundary. Whilst a nominal gap, on WG's side, will remain the scale of Billingshurst development has a glowering effect on WG's rural environs.
- [WG's extant NP](#) has an effective Green Gap policy, page 33. On consultant's advice, the policy had been revised to use field boundaries to define the gaps to remove ambiguity and as such these gaps are threatened by CDC's use of flawed HELAA data with regard to HWG0011. The following evidence has been prepared to support the policy changes in the NP Review.  
[Landscape and Historic Character Assessment - March - 2023](#)  
[Local Green Gap Assessment Report \(2020\) by NP Steering Group](#)  
[WG Locally Valued Open Land Assessment - Terra Firma Consultancy \(Feb 2020\)](#)  
[Local Residents Green Gap Assessment - Standardisation](#)  
[AECOM Green Gap Validation Report \(2020\)](#)
- Failure to protect both the landscape between Wisborough Green and Billingshurst and WG's Green Gaps will seriously compromise the former's historic nature and rural character, contrary to NPPF 143 b, c and d.

[Policy NE4 Strategic Wildlife Corridors](#)

Q.117 Is the extent of protection proposed to be afforded to Strategic Wildlife Corridors consistent with national policy as set out in the NPPF?

- Part of the Mens SSSI falls within the WG Parish and has been identified as being a habitat for the protected Barbastelle bats which can, typically, forage up to a distance 20km.
- Any risk to this species, protected under the Habitats Directive, would be contrary to NPPF 180 a, b and d, NPPF 181 and NPPF 182.

**Q.118 Is the proposed sequential test consistent with national policy and is it justified?**

- Any development, by its nature; through the construction process, possible land clearance and future usage within the strategic wildlife corridor of the Mens SSSI, the Barbastelle bat population would be further threatened.

**Q.119 What is meant by ‘in close proximity’ and in this regard would the Policy be effective?**

- By the nature of the foraging habits of the Barbastelle bat ‘in close proximity’ in this regard should mean ‘in excess of 20km of the periphery of the Mens SSSI’. The vague nature of the terminology used, namely ‘in close proximity’, indicates a lack of knowledge of the significance of this issue.
- ‘Barbastelle bats, a European Protected Species, have a large home range, with studies indicating commuting bats travelling as far as 20km, often rapidly and directly over open habitats to reach foraging grounds (Zeale et al., 2012).

Their flight paths occur across the area and are recorded from:

- The Mens ancient woodland SAC; approximately 1.2km south-east of the village supports a known maternity colony of barbastelles.
- Ebernoe Common SAC; approximately 2.7km east of the village and supports a known maternity colony of barbastelles and Bechstein’s bats.
- The Local Wildlife Site - Northup and Dunhurst copses - at the northern end of the village of WG.
- Recorded in the ecology survey undertaken for the Glebe Fields by the church.

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

- The Strategic Wildlife Corridors identified are concerned with connecting Chichester, Pagham Harbours with the South Downs National Park, this is indicative of the unbalanced nature of the draft Local Plan - Chichester-centric without due regard for the north east area.
- WGPC is concerned that this policy has not been extended to the north east area, as increased development might have a significant detrimental impact upon European Protected Bats’ corridors in the north east area.
- WGPC ask that the bat corridors are surveyed and mapped prior to delineation as protected.
- There are two Sites of Special Scientific Interest (SSSI) on the east and west borders of Wisborough Green parish, The River Arun and The Mens respectively, and the woodland is internationally important: a Special Protected Area under EU legislation. There are also several areas of semi-natural and replanted woodland in the Parish, lengths of notable verge and a number of locally important Sites of Nature Conservation Importance (SNCI).

**Policy NE6 Chichester’s Internationally and Nationally Designated Habitats**

**Q.124 Is the title of Policy NE6 reflective of its scope?**

- WGPC has no comment in this regard.

#### Policy NE10 Development in the Countryside

Q.130 Is criterion B consistent with national policy as expressed in the NPPF, and if not, what is the justification for this policy wording?

- WGPC has no comment in this regard.

#### Policy P10 Listed Buildings

Q.162 Is Policy P10 consistent with national policy as set out in the NPPF particularly in regard to the significance of heritage assets and national policy on considering potential impacts?

- Significant development in Wisborough Green is contrary to NPPF 16 and is more-or-less confirmed by:
- An email from Owen Broadway, CDC Principal Conservation and Design Officer, to Jane Thatcher regarding HELAA site HWG0011:  
'St Peter Ad Vincula is a 11th century church listed at Grade I, it survives remarkably intact despite alterations in the 19th century which retain a level of significance in their own right. The 11th century character is still readily legible and accounts for a key part of its significance. As a rural parish church its setting has a rare and striking impact, sited high on an artificial mound it overlooks the historic core of the village as well as open fields and the village hinterland towards the application site. Its commanding position, verdant backdrop, the high visibility of the church and the dominance of the spire in long and shorter views are a key part of its special interest. The survival of the original historic setting of the early mediaeval church is remarkable. The application site (HWG0011) forms open fields that have historically been within the ownership of the church and have remained undeveloped. The fields may have been historic Glebelands which contributed income to the parish church establishing a functional historic relationship as well as a visual one. These fields have an important link to the origins of the church as a visual link to its early mediaeval origins and its relationship with the wider historic landscape. The fields also help maintain the deliberate sense of separation and isolation from the village and its hinterlands.'
- This is also supported by the [Landscape & Historic Landscape Character Assessment](#) report commissioned by Wisborough Green Parish Council in March 2023.

#### Policy P11 Conservation Areas

Q.163 Is Policy P11 consistent with national policy as set out in the NPPF particularly in regard to the significance of heritage assets?

- See above

