

# **Chichester Local Plan Examination**

## **Response to Inspector's Matters - Matter 5**

### **Other Policies**

The Church Commissioners for England

13 September 2024

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## 1.0 **Matter 5 Other Policies**

### **Issue: Are the individual policies clear, justified and consistent with national policy and will they be effective?**

#### **Policy NE4 Strategic Wildlife Corridors**

##### **Questions**

##### **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?**

- 1.1 No. The extent of protection proposed to be afforded in draft Policy NE4 goes beyond the extent of protection afforded by the NPPF.
- 1.2 The NPPF states that wildlife corridors and the stepping stones that connect them should be identified, mapped and safeguarded to protect and enhance biodiversity (December 2023 paragraph 185 a). Policy NE4 states that development proposals within strategic wildlife corridors will only be granted where it can be demonstrated that '*2. the development will not have an adverse impact on the integrity and function*' of the corridor. CCE considers that this extent of protection is consistent with national policy.
- 1.3 However, the Policy adds that development proposals within strategic wildlife corridors will only be granted where '*1. there are no sequentially preferable sites available outside the wildlife corridor*'. This proposed sequential test requirement is beyond the requirements of national policy.
- 1.4 Policy NE4 seeks to add protection for development proposals outside but in close proximity to strategic wildlife corridors. The NPPF does not afford specific protections to development proposals near to strategic wildlife corridors. This extent of protection is not consistent with national policy.
- 1.5 CCE considers that the detail included within draft Policy NE4 goes beyond the overall purpose of the Policy, which should be to safeguard identified wildlife rich habitats and wider ecological networks in line with national policy. Draft Policy NE4 proposes to afford protection to areas outside of strategic wildlife corridors which is beyond the extent of protection set out in the NPPF.

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

- 1.6 No. The proposed sequential test is not consistent with national policy and is not justified.
- 1.7 Criterion 1 within the Policy seeks to introduce a sequential test to identify preferable development sites outside of the wildlife corridor. Development proposals must demonstrate that there are no sequentially preferable sites to be granted permission. This is a requirement which goes beyond what would be consistent with national policy and is not supportive of growth and development. There is no mention of a requirement for sequential tests in relation to wildlife corridors within the NPPF.

- 1.8 It is considered that this test conflicts with the underlying purpose of the policy, which is to safeguard wildlife corridors from harmful impacts that cannot be mitigated, and should therefore be deleted. The introduction of a sequential test would not be an appropriate strategy for the protection of strategic wildlife corridors, and therefore is not justified.

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

- 1.9 CCE considers that the term ‘in close proximity’ is too subjective for use in Policy NE4. The term is not clearly defined and therefore the Policy would not be effective.

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

- 1.10 The East of City strategic wildlife corridor has been relocated to the eastern side of Proposed Site Allocation A8 (land to the east of Chichester). The relocation of this wildlife corridor follows additional evidence that shows that the community route for Barbastelle Bats is along Drayton Lane.
- 1.11 CCE own land to the east of Drayton Lane (immediately adjacent to the wildlife corridor and to the east of draft allocation A8) and surrounding the village of Oving. Its land has been identified in the HELAA (2021) as being developable, including site HOV0017 (Drayton Lane). The site provides an opportunity to sensitively and sustainably provide additional homes for the district, as shown in CCE’s Land East of Drayton Lane Vision Document that has been previously shared with the Council.
- 1.12 In accordance with draft Policy NE4 the Vision Document demonstrates that the proposals for the site would not have an adverse impact on the integrity and function of the wildlife corridor and would not undermine the connectivity and ecological value of the corridor. The concept Masterplan includes the development of an ecological corridor of woodland parks, and seeks to restore an area of countryside that has previously been stripped of its ecological value and character. The proposals provide an opportunity to enhance connectivity between existing corridors that pass through the wider landscape, and enhance the adjacent strategic wildlife corridor.
- 1.13 The eastern edge of the relocated wildlife corridor encroaches into CCE land. Any proposal on this area of land would be required to take the statutory protection for bats and other protected species into consideration and would be managed as part of a sensitive masterplan for development. On this basis, it is considered unnecessary to extend the wildlife corridor to encroach into the CCE site. Any further extension to the wildlife corridor would not be strategic or supportive of growth.

**Q.121 Are the suggested MMs necessary for soundness?**

- 1.14 Yes. The suggested main modifications remove the proposed introduction of the sequential test. The sequential test requirement is not consistent with national policy and is not justified, and therefore must be removed for soundness.

and the other 1000 were used for validation. The 1000 test cases were randomly selected from the 10000 test cases. The 1000 test cases were used to evaluate the performance of the model. The performance of the model was evaluated using the following metrics: accuracy, precision, recall, and F1 score.

The accuracy of the model was calculated as the ratio of the number of correct predictions to the total number of predictions. The precision of the model was calculated as the ratio of the number of correct predictions to the total number of predicted positive cases. The recall of the model was calculated as the ratio of the number of correct predictions to the total number of actual positive cases. The F1 score of the model was calculated as the harmonic mean of the precision and recall.

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