

Matter 6: Area Policies and Allocations

Issue: Are the proposed policies and allocations justified, effective and consistent with national policy?

Policy A2 Chichester City – Strategic Housing Allocation

Q.186 Are the suggested MMs necessary for soundness?

The Sussex Wildlife Trust supports proposed modification CM270. It is necessary for the policy to be consistent with paragraphs 92 and 175 of the NPPF and for green infrastructure to be considered at the earliest stages of development proposals, as an integral part of development, as per NPPG paragraph 008 Reference ID: 8-008-20190721

Policy A3 Southern Gateway Development Principles

Q.188 Are the suggested MMs necessary for soundness?

The Sussex Wildlife Trust does not believe this policy is consistent with NPPF paragraphs 174d and 175. Specifically, the need to deliver a strategic approach to maintaining and enhancing networks of habitats and green infrastructure. Green infrastructure is not mentioned in the policy and is also not apparent in the adopted Southern Gateway Masterplan, we are therefore concerned that there will not be a cohesive approach to delivery.

Sussex Wildlife Trust would like to see the following wording added to the policy:

Deliver an integrated and cohesive approach to green infrastructure across the southern gateway, as part of a wider strategic network.

Policy A8 Land East of Chichester

Q.211 Are the site-specific development requirements as set out in the Policy justified, and will they be effective in achieving sustainable development on the site?

Main Modification CM306 proposes to amend the wording of criterion 6 from provision of ‘a substantial and effective buffer’ to provision of ‘an appropriate buffer’. In our view ‘appropriate’ is too ambiguous and open to interpretation, especially given the specific requirements of target species such as Barbastelle, and this ambiguity may result in an ecologically ineffective buffer zone. We also query whether the buffer will be applied to the entirety of the narrowed section of the Westhampnett-Pagham Harbour Strategic Wildlife Corridor, and whether development will be permitted within the buffer zone? Criterion 8 specifies ‘Buffers may contain appropriate unlit uses such as recreational use’ which has the potential to increase disturbance within the buffer zone, especially if used for dog walking, and may also reduce the ecological effectiveness of the buffer. If there is to be a buffer zone, its width should take into account the extent of narrowing caused to the Strategic Wildlife Corridor to accommodate the boundary of allocation A8.

Q.212 With particular regard to biodiversity and protected species, what is the justification for the proposed site boundary?

Sussex Wildlife Trust strongly objects to the narrowing of the Westhampnett-Pagham Harbour Strategic Wildlife Corridor to accommodate the boundary of allocation A8, and we seek further clarity on how this change is justified. The current allocation boundary would result in a large area of important woodland and scrub habitat being lost as a result of development, with detrimental impacts to priority species and habitats as well as landscape connectivity.

We recognise there is mention of the boundary change in the Strategic Wildlife Corridors Background Paper June 2024 [BP13], suggesting that the amendment has been made based on

bat data from further survey work in 2022 and 2023 (Appendix 7). However, having read Paragraph 5.29 (p.26) we are not confident that this justification has been clearly demonstrated.

In addition, Paragraph 4.19 of the Strategic Wildlife Corridors Background Paper June 2024 [BP13] states: *In the evolution of both the proposed allocation A8 and the Westhampnett-Pagham Harbour Strategic Wildlife Corridor, officers have sought to use the evidence available to balance the conflicting interests of providing necessary housing with the requirement protect and conserve ecology.*

We query how the evidence has been used, and how a balance has been struck. It is not clear what aspect of the further bat survey work undertaken in 2022 and 2023 (Appendix 7) made CDC confident to remove that section of the Westhampnett-Pagham Harbour Strategic Wildlife Corridor, or whether CDC has quantified and understood how that area of removed woodland is functionally linked to Barbastelle commuting routes. We also query whether impacts on species other than bats have been considered when proposing to narrow this section of the corridor.

Along with the potential impact on bats, we are also concerned about the impact of narrowing the corridor on the lake adjacent to proposed allocation A8. As highlighted by the Sussex Ornithological Society in their Regulation 19 response, Marsh Harrier have bred on the lake in recent years, and this location is their only known breeding site in the district. Marsh Harrier is a Schedule 1 species, scarce nationally and monitored by the Rare Breeding Birds Panel. It is vulnerable to disturbance and we are concerned that the narrowing of the corridor will exacerbate this.

Policy A14 Land West of Tangmere

Q.250 Are the site-specific development requirements as set out in the Policy justified, and will they be effective in achieving sustainable development on the site?

This policy is inconsistent with other policies in the draft Local Plan as it fails to acknowledge the requirement to leave biodiversity in a better state via the delivery of BNG. As such, we recommend an amendment to this policy to acknowledge the addition of BNG to ensure the policy is consistent with NPPF paragraph 174. SWT proposes an amendment to the policy with an additional bullet point that matches most of the other allocation policies:

Ensure that development avoids harm to protected species and existing important habitat features; facilitates the achievement of a minimum of 10% biodiversity net gain; and facilitates the creation of high levels of habitat connectivity within the site and to the wider green infrastructure network and identified strategic wildlife corridors. This includes the provision of appropriate buffers as necessary in relation to important habitats which are being retained and/or created.

Policy A16 Goodwood Motor Circuit and Airfield

Q.260 Are the suggested MMs necessary for soundness?

The Sussex Wildlife Trust is concerned that this policy is inconsistent with the other site allocations in the plan in that there is no reference to the need for development to protect and enhance biodiversity, and particularly deliver biodiversity net gains. This is especially concerning because a strategic wildlife corridor overlaps with the eastern boundary of the motor circuit and airfield. We believe the policy should be amended with the following additional bullet point to ensure consistency with NPPF paragraph 174 and with the rest of the local plan:

Ensure that development avoids harm to protected species and existing important habitat features; facilitates the achievement of a minimum of 10% biodiversity net gain; and facilitates the creation of high levels of habitat connectivity within the site and to the wider green infrastructure network and identified strategic wildlife corridors. This includes the provision of appropriate buffers as necessary in relation to important habitats which are being retained and/or created.

Policy A17 Development within the vicinity of Goodwood Motor Circuit and Airfield

Q.262 Are the suggested MMs necessary for soundness?

The Sussex Wildlife Trust is concerned that this policy is inconsistent with the other site allocations in the plan in that there is no reference to the need for development to protect and enhance biodiversity, and particularly deliver biodiversity net gains. This is especially concerning because a strategic wildlife corridor overlaps with the eastern boundary of the motor circuit and airfield. We believe the policy should be amended with the following additional bullet point to ensure consistency with NPPF paragraph 174 and with the rest of the local plan:

Ensure that development avoids harm to protected species and existing important habitat features; facilitates the achievement of a minimum of 10% biodiversity net gain; and facilitates the creation of high levels of habitat connectivity within the site and to the wider green infrastructure network and identified strategic wildlife corridors. This includes the provision of appropriate buffers as necessary in relation to important habitats which are being retained and/or created

Policy A18 Thorney Island

Q.264 Are the suggested MMs necessary for soundness?

The Sussex Wildlife Trust supports proposed modification CM358 which acknowledges existing habitat creation schemes. This is necessary to ensure the policy is consistent with NPPF paragraphs 175 and 179.

Policy A20 land South of Bognor Road

Q.267 Are the suggested MMs necessary for soundness?

The Sussex Wildlife Trust supports proposed modifications CM359 and CM362 giving the correct name to Chichester Gravel Pits & Leythorne Meadow Local Wildlife Site. This is necessary to ensure proper protection of the locally designated site as per NPPF paragraph 175.