



Sussex
Wildlife Trust

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Chichester Draft Local Plan Consultation – Regulation 19

The Sussex Wildlife Trust (SWT) recognises the importance of a plan-led system as opposed to a developer-led process and supports Chichester District Council's (CDC) desire to produce a cohesive Local Plan. SWT hopes that our comments are used constructively to make certain that this draft plan properly plans for the natural capital needed within the district and ensures that any development is truly sustainable and supports nature's recovery.

Where we are proposing a change to policy or the supporting text, recommended additions are highlighted in **bold** and deletions are ~~struck through~~.

There have been significant changes to policy relating to the natural environment since our last opportunity to comment on the preferred approach consultation back in 2018. We can see that CDC has included a significant number of new environmental policies, so we are concerned that there is no opportunity to consider this draft Local Plan through the more inclusive Regulation 18 process. SWT will focus our comments in the manner of a Regulation 19 consultation but take this opportunity to highlight broader matters to CDC where we feel it is pertinent to the production of a cohesive and sustainable plan.

Prior to the publication of this draft Local Plan, a ministerial statement in relation to planning was made on 6 December 2022¹. In light of this statement, which highlighted potential changes in respect of housing components of strategic plans, SWT asks whether CDC will seek to reconsider the delivery of the housing target?

SWT wishes to submit comments on the following policies. An absence of comment on an individual policy should not be considered a reflection of our support or objection to a policy. We reserve the right to amend our comments in the light of new evidence.

Chapter 2 Vision and Strategic Objectives

SWT supports the inclusion of Objective 1: Climate change, and Objective 2: Natural Environment. Since the 2018 preferred options consultation we have seen the royal assent of the Environment Act 2021, which supports nature's recovery. Recognising the role that this plan and its policies can play in restoring the natural environment is fundamental for sustainable development, as per National Planning Policy Guidance (NPPG) Paragraph: 003 Reference ID: 6-003-20140612

¹ <https://questions-statements.parliament.uk/written-statements/detail/2022-12-06/hcws415>

Chapter 3 Spatial Strategy

SWT wants this section of the draft plan to demonstrate more clearly how the spatial strategy is enabling nature's recovery. The plan should seek to demonstrate how the delivery of the Nature Recovery Network² and the more localised Local Nature Recovery Strategies are going to be incorporated in the spatial element of identifying allocations for development. This would be consistent with section 179 of the National Planning Policy Framework (NPPF) 2021.

Planning for nature's recovery will be vital to support the ambitions of the draft plan, for example where Objective 2: Natural Environment sets out its vision that;

Low lying land around Chichester Harbour which is likely to be flooded as sea levels rise will be protected to contribute to natural flood management and enable restoration of natural habitats such as saltmarsh and coastal grazing marsh which act as effective carbon stores and support valuable wildlife, making space for it to adapt to climate change effects. Relevant adjacent higher sites will remain available for birds and other wildlife. Strategic nature recovery networks including wildlife corridors will link habitats as part of the green infrastructure and local ecological network.

This means it will be vital for the spatial element of the draft Local Plan to consider how this is achieved through its own actions and also policy hooks. This will enable the emerging Local Nature Recovery Strategy to work effectively with the Local Plan and be a key driver for nature's recovery over the lifetime of the plan. NPPG Paragraph: 010 Reference ID: 8-010-20190721.

SWT is supportive of CDC already taking progressive action on this front with the identification and inclusion of Strategic Wildlife Corridors as per policy NE 4 Strategic Wildlife Corridors. This is consistent with section 179 of the NPPF 2021.

Chapter 4 Climate Change and Natural Environment

SWT wishes to submit comments on the following policies. An absence of comment on an individual policy should not be considered a reflection of our support or objection to a policy. We reserve the right to amend our comments in the light of new evidence bases.

Policy NE 4 Strategic Wildlife Corridors

SWT supports CDC's decision to identify and map Strategic Wildlife Corridors as part of the Local Plan process, which is consistent with section 179 of the NPPF 2021. Following a further consultation on the modification of the Strategic Wildlife Corridors in 2021, SWT supported the amendments presented in that consultation for the East of the City (Pagham to Westhampnett) Wildlife Corridor. These documents now form part of the evidence base for the Local Plan.

However, SWT wishes to raise concern over an inconsistency noted when looking at the online policies map, when compared to the information presented in the 2021 consultation. It appears that there has been a narrowing of the Pagham to Westhampnett Strategic Wildlife Corridor around the location of the proposed allocation of A8, Land East of Chichester.

It was our understanding from the information presented in the technical consultation on the Strategic Wildlife Corridors, that the modifications to the Pagham to Westhampnett corridor were proposed because of its importance for connectivity and function for Barbastelle Bats (*Barbastella barbastellus*) . It is shown on CDC technical consultation documents as a bat network³.

² <https://www.gov.uk/government/publications/nature-recovery-network/nature-recovery-network>

³ <https://www.chichester.gov.uk/thelocalplanclimatechange>

SWT is therefore concerned that the policy map supporting the Regulation 19 consultation seems to indicate that the East of Chichester Corridor has been narrowed and that part of the proposed allocation A8, Land East of Chichester, is now within the area previously identified as the Pagham to Westhampnett Strategic Wildlife Corridor. We are unaware of any information presented by CDC prior to the Regulation 19 consultation or within the draft Local Plan that provides justification for the narrowing of this Strategic Wildlife Corridor.

SWT would therefore ask CDC to provide clarity on this matter; to confirm if in fact the corridor has been narrowed in this area, and if it has, what is the justification for this amendment given the previous submission of evidence. We also ask CDC whether any further amendments have been made to the Strategic Wildlife Corridor network, as presented in the 2021 consultation. With a lack of justification for these changes, SWT does not consider Policy NE4 to be 'sound'.

We take this opportunity to highlight that the Environment Act 2021 will require the production of a Nature Recovery Network and more locally a Local Nature Recovery Strategy. The Strategic Wildlife Corridors in Chichester District will be integral components of that local network. The importance of local networks in Nature Recovery Networks is highlighted in NPPG Paragraph: 012 Reference ID: 8-012-20190721

In addition to the above concerns, SWT notes that other policies further on in the plan interact or overlay with the Strategic Wildlife Corridors; for example, Policy E3 Addressing Horticultural Needs. SWT suggests that Policy NE4 should consider making it clear that not only should development protect and enhance the features of the Strategic Wildlife Corridors, but that they should also seek to restore them as per 179 of the NPPF 2021.

When looking at the specific of the policy SWT is unclear regarding the wording in the policy around development proposals being granted permission within SWCs where it can be demonstrated that 'there are no sequentially preferable sites available outside the wildlife corridor'. It is unclear what the definition of a sequentially preferable site is? SWT considers it necessary for CDC to clarify this before we're able to provide comment on its 'soundness

SWT proposes an amendment to the policy with the addition of the term *restore* under bullet point 2:

*2. The development will not have an adverse impact on the integrity and function of the wildlife corridor and protects, ~~and~~ enhances **and restores** its features and habitats.*

Policy NE5 Biodiversity and Biodiversity Net Gain

SWT is supportive of the inclusion of a Biodiversity and Biodiversity Net Gain (BNG) policy, this is consistent with 174 & 175 of the NPPF 2021.

We propose the following amendments to the policy:

Within bullet point e), SWT proposes the addition of the word *protected* to priority, so that it will be consistent with NPPG Paragraph: 016 Reference ID: 8-016-20190721. With the amendment it would now read:

*e) **Protected and** Priority Habitats and Species.*

Point 3 e), we seek the removal of the term *where possible* at the end of the sentence. This will make it consistent with section 179 of the NPPF 2021. The new bullet point would read as follows;

e) *Outside of designated sites:*

Development proposals should identify and incorporate opportunities to conserve, restore and recreate priority habitats and ecological networks. Development proposals should take opportunities to contribute and deliver on the aims and objectives of the relevant biodiversity strategies where possible.

We also ask if CDC has considered a more ambitious target for BNG on its major development sites? We draw CDC's attention to the adopted biodiversity policy (DM18) within the Worthing Local Plan, which seeks to achieve 20% BNG on previously developed sites.

One final overarching point we wish to raise on BNG, is that we notice in Chapter 10 of the draft Local Plan some of the allocations reference phased development. We encourage CDC to consider how BNG will be addressed in this approach in terms of delivery, to ensure that it comes forward in a proportionate and timely way.

Policy NE6 Chichester Internationally and National Designated Habitats

SWT supports the clarity this policy provides to developers regarding internationally designated sites. SWT questions whether the policy or the supporting text should add clarity in relation to the need for HRA to support some applications.

Policy NE7 Development and Disturbance of the Birds in Chichester and Langstone Harbours, Pagham Harbours Solent and Dorest Coast Special Protection Areas and Medmerry Compensatory Habitat

SWT supports the inclusion of this policy in the Chichester Local Plan as one of the mechanisms to fulfil the requirement of section 179 of the NPPF.

Policy NE 8 Trees Hedgerows and Woodland

SWT supports the inclusion of this policy to recognise the value of these habitats. We propose that in order to make the policy sound and effective, it should be more specific on referencing that impacts to ancient woodland and veteran trees can be both direct and indirect, as per Paragraph: 033 Reference ID:8-033-20190721 of Planning Policy Guidance. This could be addressed by the following amendment to the policy bullet point 2:

2. *Development resulting in the **direct or indirect** loss or deterioration of.....*

Policy NE10 Development in the Countryside.

SWT suggests that in order for the policy to be found sound it should include a further bullet point to recognise that development in the countryside must avoid impacts to the natural environment in line with policies in the Chichester Local Plan.

Policy NE11 The Coast

We are really encouraged to see the supporting text for this policy and the policy itself state that saltmarsh creation and habitat restoration projects that are identified through project mechanisms will be included in the Infrastructure Business Plan. Capturing areas for habitat restoration and creation enables the integration of nature's recovery in these more diverse and cross cutting strategies, which will help further embed the delivery of the Defra 25 Year Plan Paragraph: 009 Reference ID: 8-009-20190721

Policy NE 12 Development around the Coast

We support the inclusion of a policy that recognises the issues relating to the coastline in the face of changing climate, its resilience and future development. We question whether this could or should be a more ambitious roll back distance, given the sea level rises predicted. We seek clarity from CDC on whether the 16 or 25 metre clearance buffers are a rolling measurement to incorporate continual costal erosion, or if they are measured from a fixed point from the time of the plan publication?

Policy NE 13 Chichester Harbour Area of Outstanding Natural Beauty

SW supports the inclusion of a policy that seeks to protect the Chichester Harbour Area of Outstanding Natural Beauty. This is consistent with the NPPF section 176 of the NPPF 2021.

Policy NE15 Flood Risk and Water Management

The policy states;

Elsewhere, new development should be set back at least 8m from fluvial watercourses and 16 m from tidal watercourses to allow easy access for maintenance and repair.

SWT would support an increased set back from fluvial water course of 10 meters to support opportunities for biodiversity. Further increases to the setback for tidal water course of 25 meters, would be encouraged to bring it in line with the aspirations of Policy NE 12 Development around the coast

Policy NE16 Water Management and Water Quality

SWT asks if this policy sufficiently reflects the impacts of water use by commercial interests, including the horticultural industry. Sustainability and water management must be addressed by all sectors of development.

SWT seeks an amendment to the policy under water quality and wastewater to ensure the policy is effective in accordance with NPPG Paragraph: 019 Reference ID: 34-019-20140306

Bullet point

*d) development is phased to align with the delivery **and operation** of new and improved wastewater infrastructure where this is required.*

Policy NE17 Water Neutrality

SWT is supportive of policy measures coming forward to address impacts on designated sites from abstraction. This is the first time SWT has seen a policy of this kind come forward in a Local Plan, so we have not had an opportunity to comment through the Regulation 18 process. As such, our comments related to this policy may not be considered strictly within the realms of soundness.

For example, with the offsetting schemes or alternative water supplies, will a guarantee for the lifetime of the development be required as part of the water neutrality statement? We do not feel the policy or the supporting text makes that requirement clear. SWT does recognise that the offsetting scheme is still emerging and that the supporting literature around this topic is considerable.

Policy NE 19 Nutrient Neutrality

SWT supports CDC with the inclusion of this policy. SWT has not had an opportunity to comment through the Regulation 18 process. As such our comments on this policy related to its use and therefore may not be considered strictly within the realms of soundness.

On a practical note, when considering the presentation of this policy against the information provided in the Water Neutrality Policy, the Water Neutrality Policy seems to indicate a degree of direction in terms of what the local authority requires as part of the planning application, for example a water neutrality statement. However, this type of detail is not set out in the Nutrient Neutrality Policy, and we question if it might be useful to those applying this policy to their application to have set out in policy the information required for submission.

Policy NE20 Pollution

SWT supports the inclusion of a policy relating to pollution. Further to this, given the complexity of the issues relating to the broad topic of pollution, we welcome the approach to provide more specific detail on the range of potential pollution pathways.

Policy NE 21 Lighting

SWT supports the inclusion of this policy, which recognises the need to ensure lighting does not impact protected sites and species. This is consistent with NPPG Paragraph: 006 Reference ID: 31-006-20191101 and 185 c of the NPPF 2021.

Chapter 6 Place Making, Health and Wellbeing

Policy P14 Green Infrastructure

SWT supports the inclusion of a Green Infrastructure Policy and its recognition of the multifunctional benefits that Green Infrastructure can deliver when delivered strategically. This is consistent with section 175 of the NPPF 2021.

Policy P15 Open space, Sport and Recreation

SWT is encouraged to see the inclusion of bullet point 3 in this policy. We feel it recognises the role of open space, including that of space for sport and recreation, in terms of potential for ecological benefits. This is consistent with Paragraph: 001 Reference ID: 37-001-20140306

Chapter 7 Employment and Economy

Policy E3 Addressing Horticultural Needs

Having looked at the information presented in the consultation, this policy appears to propose an extension to the Runcton Horticultural Development Needs on top of the East of the City Wildlife Corridor. Neither Policy E3 addressing Horticultural Need, nor indeed Policy N4 Strategic Wildlife Corridors, seem to address how these two policies have the opportunity to interact positively for the benefit of biodiversity. We would suggest that this policy more clearly reflects that it overlays a Wildlife Corridor and as such must recognise the requirements of policy NE 4 Strategic Wildlife Corridors when proceeding.

Chapter 10 Strategic Area and Area based policies

SWT has provided the following commentary in relation to the allocations put forward in this plan. These comments are not exhaustive and are based on our current access to desk-based data. We support Local Plan consultations providing ecological information that helps inform the suitability of individual sites for allocation. The impact of site allocations should also be considered from a spatial perspective on ecological networks.

SWT suggests that Local Plan allocations should be underpinned by proportionate ecological information to ensure plans are sound and consistent with national policy as set out in paragraphs 174 & 175 of the NPPF.

Policy A1 Chichester City Development Principles

We support this policy, identifying that it has scope to highlight opportunities for Green Infrastructure and Biodiversity Net Gain as per paragraph 174 & 175 of the NPPF.

Policy A2 Chichester City – Strategic Housing Allocations

The consultation document does not seem to provide a map to identify the area defined by this allocation, so it is difficult for SWT to give specific feedback on impacts to biodiversity.

We are encouraged to see the policy requirements acknowledge under bullet point 5, the need to avoid impacts on biodiversity, and the potential for the area to deliver gains for biodiversity. Given the urban nature of the allocation, we would also like to see the policy make reference to the importance of delivering strategic Green Infrastructure across this large area for allocation, as per section 175 of the NPPF 2021.

Policy A3 Southern Gateway Development Principles

SWT highlights the close proximity of A3, A4 & A5. We ask CDC to consider these allocations in combination and their ability to deliver a cohesive approach to the integration of Green Infrastructure and Biodiversity Net Gain should be strongly considered by CDC. This doesn't seem to be reflected in this policy of the broad development principles. In order for the policy to be consistent with national policy (174d, NPPF 2021) we propose an additional bullet point for the policy:

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

Policy A4 Southern Gateway Bus station, Bus Depot and Basin Road Carpark

The policy supporting this allocation makes clear under bullet point 6 the need to protect and provide net gains for biodiversity, as per paragraph 174 (d) of the NPPF. We seek clarity from CDC as to why many of the allocation policies say required net gain and do not specify that it must be a minimum of 10% BNG? For urbanised locations such as this allocation, there could be opportunities to deliver significantly more than 10% BNG.

We again reiterate the point made under Policy A3 about maximising the opportunities to deliver for Green Infrastructure and BNG with adjoining allocation A5.

Policy A5 Southern Gateway Police Field, Kingsham Road

We are supportive of the bullet points 5 – 9 within the policy that seek to avoid impacts to biodiversity and maximise gains for biodiversity as per section 174 NPPF 2021. We again reiterate the point made under Policy A3 about maximising the opportunities to deliver for Green Infrastructure and BNG with adjoining allocations.

Policy A6 Land West of Chichester

We can see from aerial photography and information that this allocation appears to already be under construction in a phased manner. It is also sited adjacent to a Strategic Wildlife Corridor. Whilst we acknowledge that the supporting policy has sought to recognise the sensitivities of the habitats within it and the Strategic Wildlife Corridor to the west of the site, we question whether sufficient opportunity has been taken to adequately protect these features.

For example, should bullet point 6 also reference Policy NE 8 Trees Hedgerows and Woodland, given the ancient woodland on site.

Policy A7 Land at Shopwyke

We recognise that information supporting this allocation indicates that outline permission has already been granted for this allocation. SWT has observed on the policies map that this allocation extends into Wildlife Corridor.

SWT proposes that the allocation boundary be amended to take it outside the area identified as a Strategic Wildlife Corridor in the 2021 consultation, and that sufficient buffers are incorporated within the new redline boundary to protect the integrity and function of the corridor.

SWT feels that the policy wording supporting this allocation fails to adequately reflect the opportunities it has to deliver benefits for biodiversity. For example, bullet point 8 seems negatively worded:

8) Demonstrate that development would not have an adverse impact on the nature conservation interest of identified sites and habitats and;

We suggest this is unsound as it is not consistent with national policy relating to biodiversity; for example, the NPPF paragraph 174(d) makes clear the need to provide net gains for biodiversity. The following addition could be made to the bullet point to address this:

*8) Demonstrate that development would not have an adverse impact on the nature conservation interest of identified sites and habitats and; **deliver net gains for biodiversity.***

Policy A8 Land East Of Chichester

SWT does not consider the current boundary of this allocation as shown in the draft Local Plan Regulation 19 consultation to be sound. When SWT considers the proposed allocation alongside the Pagham to Westhampnett Strategic Wildlife Corridor, it appears that there has been a narrowing of the Strategic Wildlife Corridor around the location of the proposed allocation (A8) since the consultation in 2021. SWT does not support the narrowing of the Pagham to Westhampnett Strategic Wildlife Corridor and hence does not find the proposed boundary of allocation A8 sound.

We supported CDC taking effective action to identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, as per section 179 of the NPPF 2021. Can CDC confirm the Strategic Wildlife Corridor in the location of allocation A8 has been narrowed since the technical consultation in 2021? If it has been amended, can CDC provide the justification for the narrowing of the Corridor? It was our understanding from the 2021 technical consultation that the Corridor was shifted west to incorporate bat data commissioned in part by CDC to inform the locations of the Strategic Wildlife Corridors. This information is available as part of the Local Plan evidence base on the CDC website.

Para 10.30 of the Local Plan states:

*'The site lies adjacent to the Pagham to Westhampnett Strategic Wildlife Corridor. As well as a range of wildlife interests the **corridor includes one of the few remaining parcels of woodland to the east of the city**, foraging areas and commuting routes for a variety of bat species **including the rare barbastelle bat**. The corridor encompasses former gravel workings which are now lakes, including one lying adjacent to the proposed allocation site, these lakes support a number of notable bird species including the **only known breeding site in the district for marsh harriers**.'*

SWT does not consider it possible to avoid harm to priority species and habitats in the current allocation boundary for policy A8 due to the large area of important woodland habitat for birds and bats in the north eastern section of the site allocation boundary that would be lost as a result of development

SWT propose that the allocation boundary of A8 be amended to take it outside the area identified as the modified Pagham to Westhampnett Strategic Wildlife Corridor in the 2021 consultation. In addition sufficient buffers must be incorporated within the new redline boundary to protect the integrity and function of the Strategic Wildlife Corridor.

Policy A9 Land at Westhampnett/North East Chichester

It is SWT's understanding that permission for development has already been granted for this site.

Policy A10 Land at Maudlin Farm

We note that this allocation policy seeks to ensure impacts to biodiversity are avoided and that net gains for biodiversity are achieved, in line with section 174 of the NPPF. We note that again this policy doesn't specify a minimum for Biodiversity Net Gain. We question whether the policies should be more specific, as we have seen in other Local Authority Plans. For example, the Environment Act will make a minimum of 10% Biodiversity Net Gain mandatory by November 2023, and as such this should be made clear in the policy. Alternatively, if CDC is seeking to be more ambitious by setting a minimum of 20% BNG for major development, as seen in the Adopted Worthing Local Plan, this could be specified.

Policy A11 HighGrove Farm, Bosham

We recognise that the policy supporting this allocation contains wording to avoid impacts to biodiversity and seeks opportunity for gains to biodiversity and Green Infrastructure. As mentioned previously, we question whether the policy could provide more clarity regarding levels of BNG, as we have seen in other Local Authority Plans. For example, the Environment Act will make a minimum of 10% Biodiversity Net Gain mandatory by November 2023, and as such this should be made clear in the policy. Alternatively, if CDC is seeking to be more ambitious by setting a minimum of 20% BNG for major development, as seen in the Adopted Worthing Local Plan, this could be specified.

Policy A12 Chidham and Hambrook

The information available in the consultation does not seem to define the area and as such, does not enable SWT to give effective feedback on the impacts on biodiversity from development at this scale in this broad location. We do note that that supporting policy wording requires impacts to biodiversity and protected sites to be avoided, and the delivery of Biodiversity Net Gain. We wish to highlight that the broad location, in addition to a Strategic Wildlife Corridor, has Biodiversity Opportunity Areas highlighted within it and these are likely to be key locations in Nature Recovery Networks and emerging Local Nature Recovery Strategies, NPPG Paragraph: 010 Reference ID: 8-010-20190721

Given the clear commitment to coastal policies in the draft Local Plan, we ask if that should be highlighted within the policy requirements.

Policy A13 Southbourne Broad Location for Development

The information we have been able to obtain by looking at this plan does not enable SWT to give effective feedback on the impacts on biodiversity from development at this scale in this broad location. We are encouraged to see the supporting text acknowledging the importance of master planning when considering suitability of development in that location.

We feel that this policy is inconsistent with other policies in the draft Local Plan. While bullet point 9 references no adverse impacts to wildlife, 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 national policy, 179b NPPF 2021:

*9) Demonstrate that development would not have an adverse impact on the nature conservation interest of identified sites and habitats including the strategic wildlife corridors; ~~–~~ **Deliver biodiversity net gain that facilitates habitat connectivity.***

Policy A14 Land West of Tangmere

SWT feels that this policy is inconsistent with other policies in the draft Local Plan and the NPPF. The policy 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 national policy, 179b NPPF 2021. SWT proposes an amendment to the policy with an additional bullet point:

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 A15 Loxwood

The information available in the consultation documents does not seem to define the area and as such, does not enable SWT to give effective feedback on the impacts on biodiversity from development at this scale in this broad location. We do note that that supporting policy wording requires impacts to biodiversity and protected sites to be avoided, and the delivery of Biodiversity Net Gain, in line with section 174 on the NPPF 2021.

However, we highlight that such a broad allocation policy does not enable important features that maybe present to be captured, and as such attention to this should be considered when the DPD allocation document is produced.

Policy A16 Goodwood Motor Circuit and Airfield & Policy A17 Development within the Vicinity of Goodwood Motor Circuit and Airfield

This location does not appear to be defined in the policies map. However, we highlight that the area is adjacent to a Strategic Wildlife Corridor, to the east of the airfield, and as such any proposals coming forward in that area should seek to ensure that they support the function of the Strategic Wildlife Corridor. SWT therefore proposes an additional policy requirement to the 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 A18 Thorney Island

SWT was expecting this policy to acknowledge the potential for this area to be delivering a habitat creation scheme in the form of coastal realignment in the south western edge of the barracks⁴. Also, given the coastal policies presented in the plan, does CDC not feel these should be referenced within the policy in order for it to be consistent with spatial aspirations of the plan.

Policy A19 Land at Chichester Business Park

There is no information to support the suitability of this location for development in relation to impacts on biodiversity. We note that this policy is short in nature and does not give any detail of requirements that would be sought if development proceeded in this location. Just to the north of the allocation boundary, our mapping shows us that there is a field with a water body and considerable wooded edge habitat. Therefore, we suggest that CDC considers if the policy needs detail included that makes it consistent with policy relating to impacts on biodiversity 174 NPPF 2021

Policy A20 Land South of Bognor Road

We highlight that in section 10.83 of the supporting text, Chichester Gravel Pits and Leythorne Meadow is referenced as an SNCI. This needs to be amended to LWS (Local Wildlife Site).

We support the inclusion of bullet point 7, which should recognise the sensitivities of the surrounding habitat and the need for impacts to be avoided as per section 179 of the NPPF 2021. We highlight that bullet point 7 references Chichester Gravel Pits and Leythorne Meadow as a Local Nature Reserve, and this should also state that the site is a Local Wildlife Site.

Policy A21 Land East of Rolls Royce

There is no ecological information supporting this allocation. However, we can see from aerial imagery that the allocation contains wooded habitat that appears to be functionally linked to the Strategic Wildlife Corridor. The policy currently contains no information to suggest that the existing biodiversity on the site will be safeguarded. For consistency, we would suggest that the policy includes an additional bullet point:

- **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.**

⁴ <https://consult.environment-agency.gov.uk/solent-and-south-downs/thorney-island-habitat-creation-scheme-information/>

Appendix F Monitoring Framework

SWT suggests that the monitoring framework as presented doesn't clearly indicate the monitoring requirement for each policy. As a result, SWT feels it fails to capture some important information to inform the effectiveness of the policies. For example, policy NE5 Biodiversity and Biodiversity Net Gain does not appear to have a monitoring requirement that will capture the percentage of net gain delivered by applications. Given that the Environment Act will bring in mandatory net gain of a minimum of 10% by November 2023, we feel it would be remiss of CDC to miss capturing the effectiveness of their policy against national mandatory requirements. It might also help to build a picture of the feasibility of exceeding that minimum requirement. SWT therefore proposes an additional monitoring indicator of;

- Number of planning applications delivering a BNG in excess of 10%

We also highlight that Sussex Wildlife Trust is listed as a responsible agency/partner. Can we ask CDC to clarify our role in that? It may be that an amendment is required to more specifically reference the role of the Sussex Biodiversity Record Centre rather than SWT.

Proposed changes to policy map document

We wish to highlight to CDC a matter of formatting, in that on page 26 of the supporting document the legend for map 9A9 is not legible.

We hope our amendments are adopted to ensure that the policies within the Chichester Local Plan are as robust and effective as possible. SWT would be happy to discuss any of the above points with CDC.

We do wish to attend the Examination in Public to ensure our views are given due consideration in light of any contrary comments that are received.

Yours sincerely,
Laura Brook
Conservation Officer
Sussex Wildlife Trust