



SUSSEX ORNITHOLOGICAL SOCIETY

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6 February 2019

By e-mail only

planningpolicy@chichester.gov.uk

Dear Sirs,

Chichester Local Plan Review: Preferred Approach 2016 – 2035

We have seven comments to make about the above plan:

Strategic Site Allocations

We are concerned by Strategic Site Allocations AL3 and AL12, and would also like to bring to your attention some matters about Strategic Site Allocations AL6 and AL8.

1. Strategic Site Allocation AL3

Drayton Gravel Pit is in the south-east corner of the AL3 site, just north of the railway line. We believe that this Pit is a good site for birds, although because of access difficulties it is under-recorded. Certainly the two nearby New Drayton House Gravel Pits, on the south side of the railway line, are recognised to be excellent sites for birds, to the extent that SWT recognises them as an LWS candidate-site because of their importance for birds, particularly water birds. This is because several pairs of Common Pochard are recorded as breeding annually on these two Pits south of the railway line. (Common Pochard is a duck whose breeding numbers nationally have fallen so low that it is monitored by the Rare Breeding Birds Panel – despite its name breeding birds are far from common, and the breeding population at these Pits is over one half of one percent of the national breeding population). Also more than 100 species of bird have been recorded on this site during the last 10 years which is 25% of all the species ever recorded in the whole of East and West Sussex.

Given that the Local Plan proposes building 650 houses on site AL3 north of the railway line we believe that wildlife and house building could both be accommodated if a buffer zone (ideally of 50 metres) could be established around the shores of Drayton Pit in which no development or landscaping took place. If such a buffer zone were protected to allow it to remain wild then it should provide the wildness that waterfowl would need to successfully breed.

We understand that even with such a buffer zone put in place around the Gravel Pit this site should still be able to accommodate 650 new houses.

2. Strategic Site Allocation AL6

It is noted that the western side of this site abuts the Chichester Harbour AONB and the River Lavant Marsh LWS (whose eastern boundaries are Apuldram Lane and the road to Bldrham), and lies close to the boundaries of the Chichester Hbr SPA/SAC/SSSI/RAMSAR site.

It is also noted that condition 6 of Policy AL6 states that development must *Provide mitigation to ensure the protection of the adjacent SPA, SAC, SSSI and RAMSAR at Chichester Harbour.*

We believe it would not be acceptable if the SPA/ SAC/ SSSI/ RAMSAR site, or indeed the AONB or LWS, were in any way affected by the development of AL6 and that the only mitigation measures that should be required are recreational mitigation measures. To make this clearer we would like to see condition 6 reading as: *“Ensure the protection of the adjacent SPA, SAC, SSSI and RAMSAR site at Chichester Harbour, the AONB and the River Lavant Marsh LWS. This should include mitigation measures to avoid recreational disturbance”*

We welcome the penultimate paragraph of policy AL6, namely that *Proposals will have to demonstrate that sufficient capacity will be available within the sewer network, including waste water treatment works, to accommodate the proposed development.*

3. Supporting habitat for the Pagham Hbr SPA/SSSI/RAMSAR

Before commenting on Strategic Sites AL8 and AL12 below it is appropriate to address the supporting habitat that is required for the birds cited in the designations of the Pagham Harbour SPA and SSSI, because if the supporting habitat no longer becomes available to the cited birds they will go, and Pagham Harbour could then lose its European SPA designation.

The SSSI citation states *“The numbers of wintering Pintail, Ringed and Grey Plover and Black-tailed Godwit regularly reach 1% of British Populations, and the site is of International Importance for wintering Ruff and Brent Geese”*. Of these species Brent Geese is particularly important from a planning point of view, as it alone feeds primarily outside the Pagham Hbr SPA – mostly on fields of autumn planted (winter) wheat which is widely grown around the Manhood peninsula (the other species all primarily feed within the SPA).

WeBS records show that the wintering Pagham Harbour Dark-bellied Brent Geese population varies between 2100 and 3000 birds a year, and is relatively stable. Significant numbers build up in November, and stay around to late February/early March. Typically by late March only a handful remain. One ha of winter wheat can support 2200 Brent Geese for a day and assuming an average population of 2600 birds are present for up to 100 days a winter, plantings of 118 ha of winter wheat are needed to sustain this population over the winter.

Much more than 118ha of winter wheat is planted every year on the Manhood Peninsula, but:-

- a) Bird scaring devices, such as roped off fields, are extensively used on winter wheat fields, especially between Siddlesham and Selsey, so that Brent Geese are denied access to a large proportion of the fields planted up with winter wheat.
- b) Brent Geese are wary birds so they need buffer zones between the fields on which they are grazing and humans (and their dogs).

Because of the above the Pagham Hbr wintering Brent Goose population could easily come under pressure if development is not planned for in a way that avoids development on fields that are known to have been used by them to forage on. In many instances we recognise that land owners have better knowledge of where they forage than SOS or RSPB, as birders tend to watch birds within the Medmerry and Pagham Hbr RSPB Reserves, rather than in the surrounding fields. An example of the consequences of lack of bird records of where Brent forage is that in Arun DC fields along Pagham Road were allocated for housing development (Arun Planning application P/140/16/OUT) because there were no records of Brent Geese foraging on them. It now turns out that in 2018/19 up to 3000 geese a day (the majority of the 2018/18 Pagham Hbr Brent population) have been recorded foraging on winter wheat in these fields over a 7 week period – which is probably near the maximum number of geese that these fields can support.

This winter SOS have taken over from RSPB a project to map the foraging fields that are used by the wintering Pagham Harbour Brent Geese, as this has not been mapped by the SWBGS, but this project needs to run for several more years. Until we have a full understanding of what fields (suitably planted) are used by the wintering Brent Geese we will oppose any development on fields potentially used by them for foraging, as we just do not currently have the data to hand to fully understand the consequences of allowing such development around Pagham Hbr and Medmerry. In addition to the fields where we record Brent Geese foraging (such as the South Pagham site in Arun DC) we regard any fields planted with winter wheat which farmers take the expense and trouble to erect bird scaring devices on, as fields that have probably been used by foraging wintering Brent Geese in the past and could be suitable for use by them in the future.

When we have gathered such information about where they forage and what suitable fields have bird scaring devices we then need to agree with affected parties, including Natural England and Chichester DC, what steps need to be taken to ensure sufficient acreage is protected to provide foraging for future generations of overwintering Dark-bellied Brent Geese.

From what we can see the needs of the Internationally important Pagham Hbr Dark-bellied Brent Geese population for access to suitably planted fields may not have been adequately addressed in allocating strategic sites for development.

4. Strategic site AL8

We note that this policy requires The East Wittering Neighbourhood plan, which includes Bracklesham Bay, to produce proposals for a minimum of 350 new houses, and that the settlement boundary may be adjusted to accommodate these.

The RSPB Medmerry Nature reserve lies immediately to the east of Bracklesham Bay. It has no formal conservation protection, so we feel that it is important that it is protected through the planning system.

Recognising this we would like to see point 7 of policy AL8 rewritten. It discusses two very separate matters, the impacts of more housing causing recreational disturbance in the Pagham SPA/Ramsar site and the Medmerry realignment, and the impact of development on functionally linked supporting habitat.

Firstly, we welcome the fact that point 7 talks of providing mitigation for the impacts of recreational disturbance arising from this development and believe in this respect that this should not be a case of “mitigation if required”, but that it must be a condition attached to the development of any more houses in East Wittering/Bracklesham Bay.

Secondly, given the comments we have made in 3 above, we believe that all supporting habitat must be protected if development is to be allowed. We are not opposed to the development of 350 more houses in this area but we are totally opposed to such development having an impact on either of the two RSPB reserves, or on the fields used by the wintering Brent Geese and waders that underpin the conservation citations for Pagham Harbour.

We would therefore like to see two paragraphs replacing point 7 in Policy AL8, so that it reads:

7a) Demonstration that suitable mitigation measures will be put in place to ensure that development will not create recreational disturbance that will have an adverse impact on the Pagham Hbr SPA/Ramsar and Medmerry realignment sites.

7b) Demonstration that development will not occur on any land that can be shown to be functionally linked supporting habitat for the birds on these two RSPB reserves.

5. Strategic Site AL12

SOS has over 900 records of birds at Park Farm during the last 10 years (the site of AL12) and at Church Norton Greenlease. We also note that the site of AL12 is sown this winter with winter wheat and that it is roped off to scare away Brent Geese, suggesting that it is a known site used by them in winter. We strongly oppose this site (or indeed any site on the east side of Selsey Road between Siddlesham and Selsey) being allocated for development. It is just too close to Pagham Harbour, and building on the east side of the road could directly affect the SPA.

If 250 houses are to be built north of Selsey then we would much prefer to see them built on the west side of Selsey Road, as the busy Selsey Road does form a natural protective barrier around the western side of the SPA. This would alleviate any additional pressure being created on the Church Norton part of the Pagham Hbr

SPA, which is already coming under pressure because of recent or planned housing developments at the northern end of Selsey.

Policy 30 Strategic wildlife corridors

6. We welcome the strategic approach of designating wildlife corridors between the Chichester Harbour SPA and the SDNP, and applaud Chichester DC on this initiative. However, we note that Policy 30 says that

Development proposals within, or in close proximity to, strategic wildlife corridors will be granted where (three things) can be demonstrated:

We have no problems with condition 3, and would reluctantly accept condition 2. However, we do have concerns with condition 1, namely

1. There are no sequentially available sites outside the wildlife corridor

For a start we have no idea what a “*sequentially available site*” is. And secondly we do not see how any circumstances can be permitted that allows any development to occur within a Strategic Wildlife Corridor (other than those that satisfy condition 3 of this policy) that would not result in the destruction of the corridor. It’s only going to be acceptable to wildlife as a corridor if it is not built upon. And any process of actually building anything will particularly affect its ability to serve as a wildlife corridor during the building process.

7. The four western corridors look like realistic corridors – at least on the small-scale maps within the Local Plan. However, the absence of an ability to enlarge the on-line maps means that we are not able to comment on their suitability in detail. Moreover the Y-shaped eastern corridor (Map S30b) shows that this corridor is extraordinarily narrow in places, so much so that its effectiveness looks questionable. A link to your Strategic Wildlife Corridors background paper would have been helpful, but unless there is something in this document elaborating the detailed reasons for the precise boundaries of these corridors as shown on maps S30a and S30b, then our comment would be that the corridors in S30b look far too narrow in places to provide the “non-disturbance” security for wildlife required of an effective wildlife corridor.

Yours sincerely,

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