

SUSSEX ORNITHOLOGICAL SOCIETY

 Registered charity 256936 www.sos.org.uk

 10 July 2020

By e-mail only

planningpolicy@chichester.gov.uk

Hello,

Draft Interim Policy Statement for Housing Development

*The Sussex Ornithological Society (SOS) is the county bird club and with 1900 members we are one of the largest county Bird Clubs in Great Britain. We record the birds seen in Sussex and have a database of over 5 million records. We publish the 250-page* Sussex Bird Report *annually plus periodic avifauna documenting the state of birds in Sussex. Our Recorder and the SOS Records Committee determine whether records of designated “description” (rare) species that are not handled by the British Birds Records Committee should be accepted and entered into our database of birds recorded in the county, or whether they should be considered not proven. We maintain the official Sussex Bird List - which currently stands at 405 species. We also actively work to protect birds and their habitats in Sussex. More details about us can be found on our website* [*www.sos.org.uk*](http://www.sos.org.uk)*.*

Given the delay in the Regulation 19 consultation on Chichester’s new Local Plan the SOS accepts the need for this Interim Policy Statement on Housing Development.

Strategic Wildlife Corridors

We welcome the fact that in section 6.2, bullet point 6, CDC acknowledges the need for Strategic Wildlife Corridors to be considered when determining planning applications:

Development proposals in or adjacent to areas identified as potential Strategic Wildlife Corridors as identified in the Strategic Wildlife Corridors Background Paper should demonstrate that they will not affect the potential or value of the wildlife corridor.

Relevant policies include: • LPR S30 Strategic Wildlife Corridors

We have separately made representations to you about the importance for birds of some Gravel Pits near the Strategic Wildlife Corridor to the east of Chichester, namely the two Drayton House Gravel Pits and the gravel pit on the adjacent AL3 site known as Drayton Lake, and we have requested that the western arm of the eastern Wildlife Corridor be expanded to incorporate these sites.

The two Drayton House Gravel Pits are the most important site for birds in East or West Sussex which currently has no conservation designation. Between 1 Jan 2010 and 31 December 2019 SOS has 4781 records of birds on this site, recording 116 species of bird, including 57 Red/Amber listed species of high/medium conservation concern. 17 of these species are also Section 41 bird species of principle importance for conservation.

The adjacent Drayton Lake, on the northern side of the railway line on the AL3 site is also important for birds. We believe that all three of these former Gravel Pits should be incorporated into the eastern Strategic Wildlife Corridor.

Biodiversity and Net Gain

One omission from the Interim Policy Statement is a section on biodiversity or a specific reference to the need for development proposals to include proposals to deliver a long-lasting net gain in biodiversity. Although the Statement references that the National Planning Policy Framework is *a material consideration in planning d*ecisions (3.1) , delivery of net gains in biodiversity is an explicit part of the current NPPF and this is not explicitly mentioned in the Interim Policy Statement. We feel that developers should be left in no doubt that planning applications will be required to fulfil this part of the NPPF. We therefore feel that the Interim Policy Statement should include a statement to this effect.

Yours sincerely,

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