

Southbourne Parish Neighbourhood Plan Examination Wildlife Corridors Question Responses

We felt that questions 24, 25 and 26 merited a fuller response, and as there is much to say and to avoid repeating references to data sources and our line of thought, we have prepared this note to address all three.

Initial Comments of the Independent Examiner - Policy SB13

23. The previous Policy 3 was specific to the Green Ring and I was really thrilled to see that the original neighbourhood plan's ambitions are being taken forward in the new developments. It is a great example of a locally distinctive policy delivering on the ground.

24. This policy is wider ranging and refers to wildlife corridors and waterbodies. As shown on the Policies Map, the extent of the corridors is somewhat "fuzzy" and that has implications as to when a decision maker would know whether the policy should be applied when considering a planning application. Can the Parish Council explain how the boundaries have been arrived at, as it appears to include residential areas, which I would be surprised act as wildlife corridors. For example, is there any evidence that Pagham Close and Sadlers Walk in Hermitage, are used or capable of being used as ecologically important routes, which are any different to other parts of the parish.

25. I am concerned that the policy is not properly backed up by convincing evidence that supports the significance of these extensive shaded areas, to demonstrate that they are, or are capable of, performing a role that requires policy recognition and protection, meeting the expectations as set out in paragraph 179 of the NPPF.

26. I appreciate that the new Local Plan is also promoting strategic wildlife corridors, although this has yet to be tested at examination. Is there evidence from the Local Plan evidence base which would justify the extent of the areas to be covered by this policy in the neighbourhood plan? Indeed, it would also be helpful if the proposed Local Plan strategic wildlife corridors could be superimposed on the neighbourhood plan proposed maps, so I can appreciate whether they cover the same area. I will leave it to the Parish / District to decide who is best placed to produce that plan.

Question Responses

The Southbourne Parish Council (SPC) response to these questions has been divided into separate headings for clarity:-

1. Introduction
2. District Council Strategic Wildlife Corridors - Evidence
3. Southbourne Parish Neighbourhood Plan Wildlife Corridors - Evidence
4. Inclusion of Residential Areas
5. How they are shown in the NP
6. Support for the NP Corridors
7. Conclusion - Strategic (or non-Strategic) Wildlife Corridors?

1. Introduction

The background to the identification of the Chichester District Council's (CDC's) proposed Strategic Wildlife Corridors and the wider areas shown in the Southbourne Parish Neighbourhood Plan (SPNP) is summarised in "Evidence supporting specific Policies SB14 EV1" in the SPNP section on SPC's website, here: <https://southbourne-pc.gov.uk/neighbourhood-plan/southbourne-parish-neighbourhood-plan-review-2019-2037-submission-plan/>. The Southbourne Environment Group assisted CDC Wildlife officer Sarah Hughes in many of the surveys and recordings as she was building the concept of Wildlife Corridors for inclusion in the Local Plan Review 2035. The evidence was collected by and with professionals. A Wildlife Corridor based on the chalk stream at Lumley was included in the CDC draft proposals published for consultation in 2018. As a result of comments received, a considerable amount of further survey work was undertaken by the District Council and SPC and an additional Wildlife Corridor based on the Ham Brook chalk stream was proposed in the second CDC Consultation in 2021.

SPC fully supports the Wildlife Corridors proposed in Local Plan Policy S30 but based on the evidence collected considers that they should be much larger. The two superimposed versions proposed are shown on the attached map prepared by CDC (WC1).

While it does refer to the evidence base gathered for the Local Plan review, the Neighbourhood Plan does not rely for its legitimacy upon the adoption of the new Local Plan.

2. District Council Strategic Wildlife Corridors - Evidence

The following evidence has been published by CDC in support of LP Policy S30:

www.chichester.gov.uk/media/35531/Strategic-Wildlife-Corridors-Technical-Consultation-Documents/doc/Strategic_Wildlife_Corridors_Technical_Consultation_Document.docx?m=637649739698170000

www.chichester.gov.uk/media/35551/Map-1-Proposed-Nutbourne-to-Hambrook-Strategic-Wildlife-Corridor/doc/SWC_consultation_2021_Map1.docx?m=637656777912100000

Copies are also attached (WC2 & WC3).

See also the attached CDC Biodiversity Map (WC4).

3. SPNP Wildlife Corridors - Evidence

The principle behind Neighbourhood Plan Policy SB13 supports the CDC wildlife corridors, which are not yet part of an adopted Local Plan. The difference between CDC and SPC lies in the interpretation of the evidence, collected jointly, and the additional evidence collected by SPC. The CDC Ham Brook Wildlife Corridor is particularly narrow and officers from the South Downs National Park “queried whether they (Wildlife Corridors) are substantial enough to perform [their] intended function” at one of the meetings held by CDC (Duty to Cooperate Statement of Compliance, CDC Jan 2023 - page 37). The SPNP policy considers the habitat evidence presented in the Sussex Wildlife Trust biodiversity record, recognises the vulnerability of these narrow corridors and notes Natural England’s strong advice on the desirability of wildlife corridors being significantly wider than the Local Plan’s proposals (see ‘A2.3.2.2 Improving connectivity’, Nature Networks Evidence Handbook [Natural England Research Report NERR081], attached as WC5). The boundaries proposed by the SPNP also recognise that while Southbourne may need to accommodate substantial growth in the future there is sufficient scope to designate wider corridors, and possibly buffer zones too, without compromising development opportunities. This was demonstrated by the work undertaken in support of the previous, now withdrawn, Neighbourhood Plan that allocated land for 1250 dwellings.

The SPNP Lumley wildlife corridor is wider between the A27 and the A259. Surveys undertaken within Havant Borough Council show that rare Bechstein bats overfly and have a roost within this area (see the attached study WC6 done in connection with a development proposed at Long Copse Lane, Emsworth: Davidson-Watts Ecology 9 August 2021 - pages 13, 17, 18 and 19). This is not surprising as Havant Borough Council has confirmed Bechsteins in wooded areas within the Borough (Draft Havant Borough Local Plan 2036, text page 141, attached as WC7) and map, page 142 (WC8). The SPNP Lumley Corridor is wider at the southern end to create a more robust link to Chichester Harbour and includes most of Eames Farm and Marina Farm. Eames Farm is a 170 acre Local Nature Reserve managed by the Chichester Harbour Trust. It contains "a large area of coastal grazing marsh, wetland and reedbed, it provides vital habitat for a wide range of migrating waders and wildfowl, and many rare plant and insect species" (www.chichesterharbourtrust.co.uk/copy-of-about-us). Marina Farm was bought recently by the Chichester Harbour Trust to which SPC contributed funds. It is proposed to remove derelict stables and associated structures to create a nature reserve with different habitat areas. An ecological study of the site was prepared before purchase which identified considerable potential. The ecological value of this wider area at the southern end of the SPNP’s proposed corridor is reflected in multiple statutory designations, but the southern boundary of the corridor proposed within the Local Plan stops short of the RAMSAR, SPA and SSSI sites. It appears logical to SPC to emphasise the connectivity provided by the wider area by joining them together (see screenshots of maps taken from DEFRA’s MAGIC website, attached as WC9 and WC10).

The Ham Brook Wildlife Corridor in the SPNP is also much wider, especially to the north, where substantial water vole habitat was identified by the CDC/SPC surveys both to the west and east. The SPNP Wildlife Corridor includes an important culvert under the A27 which provides one of the few safe north/south connecting routes for wildlife which is otherwise generally severed by the road. The water vole habitat is provided by streams which flow into the Ham Brook and are important ‘feeders’ to the chalk stream. The 2020 Sussex Biodiversity Record Centre report, Map 4, page 10 (attached as WC11) includes the main ‘feeder’ to the Ham Brook but CDC has not recognised this, nor the results of multiple bat surveys (WC12 and pages 66-133 of the Sussex Biodiversity Record Centre report) and Barn Owl habitat in their Wildlife Corridor area as shown on the CDC Southbourne biodiversity map (WC4 again). The SPNP proposed Wildlife Corridor is, again, much wider at the southern end to include recorded barn owl and water vole habitat and to confirm a more robust connection to Chichester Harbour. It is worth noting that a Local Wildlife Site, Nutbourne Pastures is shown on Map 2 (site 2) on page 8 of the Sussex Biodiversity Record Centre report (WC13) and SPC considers it would make sense to encompass most of it. To the east of the Nutbourne Pastures site and to the south of the southernmost boundary proposed for this corridor by the Local Plan lies a part of Nutbourne Marshes. This is where the Ham Brook enters Chichester Harbour and as this is part of a RAMSAR, SPA and SSSI site (see MAGIC map screenshot WC14) it seems logical to extend the Wildlife Corridor south to include this land too.

The Sussex Biodiversity record centre has verified and included the reports of all survey results. The full report can be found here: <https://southbourne-pc.gov.uk/neighbourhood-plan/southbourne-parish-neighbourhood-plan-review-2019-2037-submission-plan/> (scroll down to Evidence supporting specific policy SB14, item 7).

4. Inclusion of Residential Areas

The Wildlife Corridors include established residential areas because although wildlife may be discouraged, it is not confined to boundaries defined by humans. Established gardens, trees, hedges, etc. provide wildlife 'steppingstones' and foraging areas. The Bio Blitz organised by SPC in 2019 showed a surprising wealth of hedgehogs, slowworms, stag beetles, great crested newts, etc. in peoples' gardens and ponds. It is the newly developed areas that tend to be devoid of life, as most developers clear everything, then do an ecological survey to reach their 10% net gain with ease. We are not blessed with a development free area for any of the Wildlife Corridors. They have to include some residential areas to achieve connectivity. Much can be achieved by Wildlife Corridor designation followed by publicity to advise residents how to support wildlife.

5. How they are shown in the SPNP

The "fuzzy" lines shown in the SNP were introduced because, as explained above, it is difficult to define exactly where wildlife is to be found. However, if more certainty is required, the SPC has no objection to specific boundaries being included in the SPNP perhaps with some supporting text explaining that the boundaries define a starting point for further surveys to be undertaken as required.

6. Support for the SPNP Wildlife Corridors

In their Reg 16 response (dated 11th April 2023), Chichester Harbour Conservancy stated: "with regard to the proposed Southbourne Parish Wildlife Corridors set out in the Southbourne Modified Neighbourhood Plan 2014-2029, we fully support these, and we note that those set out in the emerging Local Plan are much narrower than those shown in the Southbourne Modified Neighbourhood Plan 2014-2029. We would urge the Council to incorporate the areas shown in the Southbourne Modified Neighbourhood Plan 2014-2029 Parish Wildlife Corridors into the 'Strategic Wildlife Corridors' within the emerging Local Plan, to be consistent and to allow sufficient protection for these areas which are so vital to our wildlife and wellbeing."

In their Reg 16 response (dated 13th April 2023), the Environment Agency stated: "we are supportive of the wildlife corridor running the length of the Lumley Stream and Ham Brook and applaud the ambition to protect these chalk streams which are of great biodiversity value (Policy SB13). Where possible, restoration should also be targeted. The CaBA Chalk Stream Restoration Group launched a Chalk Stream Strategy in 2021 and an implementation plan in 2022. These can be accessed here and may provide helpful information/guidance."

7. Conclusion - Strategic (or non-Strategic) Wildlife Corridors?

SPC considers that it is appropriate to define Wildlife Corridor boundaries in its Neighbourhood Plan. CDC refers to their own proposed corridors as "strategic" and SPC is using local evidence to interpret the CDC boundaries at the local level. It seems that CDC is not opposed to this approach as it appears it was agreed at a meeting with officers of the South Downs National Park that corridor boundaries would be agreed through Neighbourhood Plans (Duty to Cooperate Statement of Compliance, Jan 2023 - page 38).

When, as we hope, the Neighbourhood Plan is made, SPC would welcome and expect CDC to update and define its strategic wildlife corridor boundaries on its policies map in accordance with the Neighbourhood Plan.

We hope that this paper explains clearly how the proposed Neighbourhood Plan boundaries were arrived at, the evidence base that was taken into account and how they provide robust routes connecting the South Downs National Park and the Chichester Harbour AONB. Indeed, we consider that the wider boundaries proposed in our Neighbourhood Plan are more likely to be fit for purpose than the narrower ones defined in CDC's Local Plan, while still *not compromising opportunities for properly planned strategic development in the future.*

N.B. SPC is aware that the Sussex Biodiversity Record Centre report is not easy to navigate. If the Examiner requires any additional information from this report the SPC will be pleased to assist.