



SAVE OUR SOUTH COAST ALLIANCE

HOW WILL THE CDC'S LOCAL PLAN IMPACT ON BIODIVERSITY AND WILDLIFE?

By

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Jenny Bentall Morris and Dick Pratt examine the impact of CDC's Local Plan on biodiversity and wildlife and explain SOSCA's objections and concerns about the proposals.

The Government has required that CDC build 12500 housing units in the next phase of planning which ends 2035.

Within the Chichester District area 73% of its land is occupied by the SDNP (South Downs National Park), and a further 3.5% is occupied by the CHAONB (Chichester Harbour Area of Outstanding Natural Beauty). (1)

Although building does go on within these protected areas (see Bosham) both areas have been ruled out of providing any of the land required for building for the housing development contained in the CDC's Local Plan. This leaves less than 25% of land available to accommodate these housing developments. But given that this remaining area already contains considerable existing development and infrastructure, it leaves very little land that is both available and suitable to accommodate these housing developments.

The Government requires Local Authorities to use the 'standard method formula' detailed in the **NPPF** (2) to assess local housing need, but this formula takes no account of available land. Chichester District has one of the strongest arguments for lack of available land and the CDC did make a somewhat belated challenge to Government to be a special case, but this was refused, and so, in order to plan for this house building requirement the CDC has identified the A259 corridor west of Chichester from Fishbourne to Emsworth and the Manhood Peninsula as areas to accommodate this massive housing development. This would mean thousands of new homes along the A259 corridor (referred to in the CDC Plan as the East/West Corridor) – a narrow strip of land only one mile across at its narrowest point that runs between the SDNP and the CHAONB – and on Chichester's low lying coastal peninsula, home to three internationally designated wetlands.



Our fragile wetlands across the Chichester Plain are imperative for the many migrating birds



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The wetlands within Chichester District represent some of the most important wetland areas along the south coast and benefit from a number of special environmental protections which need to be taken into account when planning housing development nearby. These protections are - SSSI Status (Site of Special Scientific Interest) by Natural England, it is a RAMSAR site (3), and has recognition by the EU as a special site for migrating birds. Wetlands not only provide one of the most biodiverse types of habitat, they are also an excellent source of CO2 absorption. Sea level rise also means that wetlands are becoming increasingly threatened environments, requiring space to roll back to prevent coastal squeeze.

Furthermore, flowing down from the chalk hills of the South Downs we have five of the rare chalk streams of the 210 that exist world-wide. England has a tally of 160 such streams which have been described as 'England's unique contribution to global ecology'. 37 of these streams are on the endangered list, drying up through over abstraction, climate change, through pollution and through nitrates being introduced to watercress plants.

In today's world any planning development now needs to take on board the impact of climate change and the lessons that should be learnt from the Covid19 pandemic. While Covid19 has delivered some unexpected environmental benefits, there have also been warnings on how we treat nature. The question is whether we can capitalise on this moment and make a greener world.

The CDC's Local Plan to build some 3000 new homes along the A259 corridor and nearly 2000 on the peninsula has been criticised heavily from the point of view of how this will impact on humans. We already have the massive development of White House Farm (1600 houses) as an example of how such developments can have a negative impact. These criticisms of the Local Plan can be listed – ribbon development not 'place-making', coalescence of villages not creating community, insufficient infra-structure (roads, schools, doctors etc), housing numbers in excess of local need, poor housing design, identikit housing not housing for local demographic, housing not meeting standards to be carbon neutral, flooding risk, sewage overload, air and water pollution, economic impact on tourism and agriculture.

But there is a more fundamental criticism of the plan and that is the potential negative effect on **the environment and the impact on wildlife and biodiversity.**

Legislation is in place for the protection of the environment, in particular from the EU and endorsed by **UK Circular 2005** (4) for the recognition of the impact of development on biodiversity. Human activity and development has for a long time been at war with nature leading to the extinction of thousands of species, and millions more are under threat. These extinctions relate not only to the iconic mammals like the tiger and the panda or – closer to home- the hedgehogs and bats, but to thousands of birds, (song thrushes, starlings) insects (bees and butterflies) and plants and microbes in the soil.

It is at last being realised that we – humans – live in an ecosystem and if we destroy this complex environment we ultimately destroy ourselves. We do this by taking away habitat, their space and food sources, by how we manage land, and by pollution.

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The Covid19 pandemic has been a wake-up call and may not be the last pandemic, unless we take note. Not just the protection of biodiversity is needed but also its restoration. Alongside this, climate change presents another huge challenge to how we plan.

The NPPF does provide some guidance in **Section 15 Conserving and Enhancing the Natural Environment, 170**. States: *‘Planning policies and decisions should contribute to and enhance the natural and local environment.’*

It goes on to explain that plans should *‘protect and enhance valued landscapes’*, and *‘recognise the character and beauty of the countryside and the wider benefits from natural capital and ecosystems’*.

In respect of the restoration and enhancement of priority habitats and the ecological networks for protection, Section 15 of the NPPF goes on to state the following, that plans should *‘take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure’* (171) and *‘protect biodiversity and geodiversity by identifying, mapping and safeguarding components of wildlife-rich habitats and wider ecological networks’*. Points 174 and 175(b) state that plans should *‘promote the conservation and recovery of species’* and protect *‘wildlife corridors and stepping stones’*.

The CDC’s Local Plan proposals to build extensively along the A259 corridor and throughout the coastal plain needs to be considered in this context, where we have a protected environment to the North, the CHAONB to the south and a string of internationally important wetlands to the south. The issues that need to be considered are: Connectivity and Wildlife Corridors, Buffer Zones and Coastal Squeeze.

Connectivity and Wildlife Corridors



Here are two of our most endangered species that are under constant threat from the diminishing open spaces

Historically the ancient woodlands of the National Nature Reserve (Kingley Vale) and the SDNP were linked to the flood plains and beaches of the Chichester Harbour (CHAONB). The habitat fragmentation between the SDNP and the CHAONB is a threat to the movement of mammals, birds and insects.

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Mammals such as deer, foxes, hedgehogs, badgers already have to navigate two major barriers between the two protected sites – the A27 and the South Coast Mainline. With increasing urbanisation along the A259, this road is becoming a third barrier for mammals.

Other creatures such as water vole, brown trout, moorhens, white egrets, not to mention sticklebacks and a variety of other birds and insects are reliant on the chalk streams, copses and hedgerows. As these links are destroyed through human development, the damage becomes irreparable.

Much of the area along the A259 west of Chidham/Hambrook is already compromised by extensive previous and current building. But between Hambrook and Fishbourne there is still the opportunity to maintain vital wildlife connections. The planners maintain that environmental protection is a primary concern and made a late entry of wildlife corridors into their Plan, along some of the chalk streams, but not all. The Newells Lane chalk stream is omitted altogether, and the buffer zones around the streams are down to 200m.

Given that the SDNP and the CHAONB and other wetlands have nationally significant status for environmental protection, linking these sites is of national significance (**Glover Review**)(5). The scale of provision for wildlife connectivity should be on the scale of Regional Protection – not the Local Protection scale proposed by the CDC.(6) This Regional Protection Scale states migratory pathways should be greater than 500m wide. Effectively that means that all undeveloped land to the west and south of Chichester should be safeguarded from further development. The harbour and coastal plain of Chichester is a unique environment and one that will become increasingly rare as sea levels rise and coastal plains are developed. The high capacity of this whole area for biodiversity, species migration, CO2 reduction and flood risk management warrants its status as a Special Habitat and Climate Adaption area.

Buffer Zones



The congested only route along the east west corridor is the boundary with our highly protected and endangered AONB of Chichester Harbour



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The **UK Report on Biodiversity (7)** defines the aim of buffer zones as *'to bring the land around core (protected) sites under sympathetic land-management practices.'* Unfortunately, wildlife does not confine itself to the protected area, so to genuinely protect wildlife a larger adjacent zone is required.

The importance of the outlying areas between the SDNP and CHAONB has been documented by research by the **Sussex Biodiversity Research Centre (8)** which records all bat flights, wetlands linkages, connections between barn owl habitats and records all species sited there. For example, fields to the east of Broadbridge in Bosham Parish (and this includes Highgrove Field, CDC plan area AL7) have been shown to play host to over 100 different species. **The Woodland Trust (9)** has lamented the lack of buffer zones designated by the UK, to quote – *'It means that designation of a protected area is doing nothing to actually address the threats external to the site. It is not promoting positive management of surrounding land'*.

To refer back to the NPPF, Section 15, 174 states that in protecting and enhancing biodiversity and geodiversity *'wider ecological networks should be included'*, and in 176 states that *'development on land within or outside a Site of Special Scientific Interest should not normally be permitted.'*

Chichester Harbour and Pagham Harbour have designations as a Special Protection Areas which carries with it a 'zone of influence' of 5.6km. Where there is evidence that an increase in residential development or recreational disturbance will result in significant harm to such areas of special protection, there is a requirement that developers make mitigation against such an impact. Failure to do so would contravene the **CDC's Local Plan Policies Key Policy 50, 2014-29 (10)**. As such any development would also contravene the **Conservation of Habitats and Species Regulations 2017 (11)** and the advice of the NPPF.

The question is whether any developments that stand between the SDNP to the north and the peninsulas of Bosham and Chidham within the CHAONB to the south can achieve an off-set elsewhere in mitigation to the harm to wildlife and the natural environment? Clearly not, since the wildlife corridors betwixt the SDNP and the adjacent 4km stretch of copses, hedgerows, spinneys and pond margins have no purpose anywhere else than where they are and cannot be substituted. This includes the lands that run alongside the roads and rail tracks that connect already to the hedgerows, thickets, copses and spinneys, as well as ditches, ponds and streams.

If these are destroyed then the wildlife corridors are gone.

Coastal Squeeze

The issue of coastal squeeze follows on very closely to the need for buffer zones. **The Select Committee Report on Biodiversity** states, *'The positive side of including buffer zones is that it gives more flexibility to restore and recreate biodiversity. This is so particularly in coastal and marine areas where there maybe loss of important habitat due to sea level rises.'*

Briefly 'coastal squeeze' can be defined as the loss of coastal habitat, wetlands and salt marshes, in front of sea defences. To expand, where man-made structures have been built, to protect communities from coastal floods by such measures as sea walls or rock revetments, the salt marsh habitat is prevented from moving landwards as sea levels rise. This is known as coastal squeeze and



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means that the extent and functioning of the salt marsh reduces or is lost altogether, along with the habitat and species that it supports.

These wetlands and salt marshes are hugely important, both for the bird and wildlife species that they support – for example it is estimated that over 7500 Brent Geese over-winter on the wetlands of Chichester Harbour. These wetlands are also important because they absorb large quantities of CO₂

The **Environment Agency's Regional Habitat Creation Programme (12)** has recognised the importance of these habitats and tried to assess these losses and to identify potential sites for the recreation of new salt marshes. So it is important that Chichester District, where there still exists a strip of unbuilt-up coastline on the South Coast, continues to provide and to protect these wetlands for migrating waders and seabirds. But we have climate change and we have potential sea level rises. A rise in temperatures of 2°C on our flat low lying coastal plain would bring in sea levels to reach the A259. CDC proposals to build along the A259 would firstly not allow for the landward migration of the wetlands and secondly cause flooding of the new development

References

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JBM + DP for SOSCA
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