

Dear

AL/111/16

Thank you for forwarding these rebuttal statements. Unfortunately the grammar in certain places makes the text and arguments presented hard to follow. Nevertheless I make the following points:

Overview

- The ANDP is a made plan and the policies contained form the agreed policies within the Local Plan.
- Local authorities have a duty to promote biodiversity.
- The concept of creating biodiversity corridors evolved, as did the overall policy framework of the plan, over a four year period through to referendum in October 2016 and is in accordance with the NPPF para
- The initial Green Infrastructure Study 2012 identified the need to maintain a separation and separate identity between the villages of Westergate, Eastergate and Barnham.
- This site was not considered by the Aldingbourne Neighbourhood Plan Team as a candidate for housing at the time when all potential sites were appraised because the Team was advised by Arun District Council that it **could not do so** because it was part of the whole site containing the proposed strategic allocation for the draft Arun Local Plan.
- The initial Vision Document for the Strategic site for Barnham, Eastergate and Westergate indicated the area East of Westergate would be designated as a Country Park to serve both existing and new housing development. A Country Park would be an appropriate planning use of this part of the Strategic Site, including this site, because it would fulfil the identified need for separation between the villages, provide protection for the biodiversity interest identified, maintain its historic visual landscape and maintain longstanding important informal recreational use.
- However the policies in the draft Arun Local Plan were identified by two recent examiners as not having weight as this Plan has not yet been adopted.

Specific comments:

Para 2: While the site is shown on the map as pasture it had not been pasture for many years and was in fact scrub / young woodland. This map provides no key showing woodland despite the fact that there are other scrub / woodland sites in the parish. It does link to woodland wildlife habitat to the north.

Was the neighbourhood plan team aware that AL/111.16 land was included in the strategic allocation?

Yes, the NDP team were aware that this site was included in the Strategic Allocation. This site was not considered by the Aldingbourne Neighbourhood Plan Team as a candidate for housing at the time when all potential sites were appraised because the Team was advised by Arun District Council that it **could not do so** because it was part of the whole site containing the proposed strategic allocation for the draft Arun Local Plan.

The NDP team was aware that the land East of Westergate was envisioned in the Vision study for the strategic site as being a Country Park, which would benefit of residents of the proposed strategic site and existing residents. Given the contained landscape of the land East of Westergate, the long history of informal recreational use, its biodiversity value and

the importance to the local communities of maintaining separation between the settlements this was regarded as an appropriate designation for this area.

The NDP team could not possibly have been aware that the site was in a strategic allocation “as early as 2009” because the Localism Act (which provided for Neighbourhood Plans) didn’t come into being until 2011. Furthermore prior to publication of the draft Arun Local Plan a strategic location and road scheme had been proposed by developers for an entirely different location.

Note also that the ANDP team had been advised by their consultant and Arun DC that to have also included the East of Westergate biodiversity corridor in the maps showing it as Green Space or Open Space would not be possible, even though they had historic recreational use and had been identified during local consultation as important for this purpose, because previously such large sites had been rejected by NDP examiners. However, this was later proved incorrect because a large site in the neighbouring parish of Walberton was approved as local green space/open space. Informal recreational use of the site is evidenced by being criss -crossed by paths which are not formally designated footpaths:

Inspectors View of Policy EH2 justification and strategic allocation

Mr Slater did raise concern about the quality of the maps. It is indeed unfortunate that the maps supplied to the NDP team were not adequately up to date and did not clearly differentiate pasture from woodland (indeed the Context map appears to have no key for woodland although there is woodland elsewhere in the parish).

Maps A1 and A2 were drawn up in order to show both the biodiversity corridors in the whole parish and the detail map of land East of Westergate was drafted and in close consultation with Arun DC planning department following the Inspector’s report, which required that the “agricultural fields” East of Westergate be removed from the biodiversity corridor. The Inspector did not require scrub / woodland to be removed and areas of woodland, which has a structure which is of biodiversity importance to birds and insects, were retained by agreement with Arun DC, who approved the final maps. Site AL/111/16 was woodland and coterminous with the wet woodland mentioned on page 6 of this rebuttal and was therefore retained for biodiversity purposes.

Note also that the examiner states that it would be wrong to pre-empt the decisions to be taken in the Local Plan around use of this area, and proposed that the question of the expansion of the biodiversity – green corridor beyond that established following his revision be reviewed through the Local Plan sustainability appraisal. This is noted in the Foreword to the made ANDP approved by Arun DC.

Note that the examiner who rejected the first draft Aldingbourne NDP did not raise any query regarding the proposed biodiversity policies.

Applicants comment on Mr Beaton’s July 2016 “Justification for Biodiversity Corridor”

It is suggested that there is nothing in the NP or evidence base to show how individual fields or land parcels were assessed for inclusion in the Biodiversity corridors. This is untrue. The minutes of ANDP meetings do from time to time refer to the work being undertaken but would not be expected to show information about individual fields or land parcels because the research was being undertaken by a professional (Mr Beaton, who undertook this in a

voluntary capacity prior to and after joining Aldingbourne Parish Council). His recommendations were incorporated into the draft by the consultant, which was then issued for public consultation. Individual fields are not referenced in minutes containing brief updates and action points which were never intended to record the material being assembled in the draft Plan.

It is wholly incorrect to infer that it was only in July 2016, after publication of the second draft plan, that any rationale for the biodiversity corridor was put forward and that its justification was “belated”: **The research process undertaken in identifying the biodiversity corridors took place throughout the 4 years of the ANDP preparation.** It formed the subject of a presentation to the Arun and Rother Connections (ARCO conference at the University of Brighton, Falmer, on 24th June 2014, when the tithe map, flood map and chalk stream map were presented. An article in the parish newsletter of Autumn 2016, delivered to every household, summarised the work and explains how individual fields and land parcels were included in the biodiversity corridors: By reference to tithe maps, chalk stream maps, flood risk maps, Sussex Wildlife Trust data, information from local residents, fieldwork and walking the parish during different seasons (as quoted in the rebuttal).

Page 5: While AL/111/16 site does not have a chalk stream running through it, it is adjacent to a wet woodland with a chalk stream running through it. While the tithe maps show arable or pasture to the side of this chalk stream, it is incorrect to say that they would contain much in the way of remnant habitats because the development of scrub woodland on these sites has changed the habitat and allowed for species to move onto the site.

Page 6: While there are no formal rights of way over AL/111/16 land photos of the site show, even after clearance work has littered the ground with brash, that informal footpaths have clearly been established into and through the site to the countryside beyond.

The last paragraph of this section is incorrect: The tree/ditch line referred to is not the only feature of the AL/111/16 site appropriate for inclusion in the biodiversity corridor. As young woodland/scrub with an open canopy, an important habitat for two protected species of reptile (which may be using a considerable and unknown part of the site for feeding) and providing nesting habitat and feeding grounds for birds and insects the whole site was worthy of inclusion. AL/111/16 is not compliant with policy EH6 of the made ANDP, not least because no management plan was submitted before the woodland was destroyed to show the health of hedgerows and trees and how they would be maintained. It should be noted that it is the wholeness of an ecological network which is important: A network which is breached or damaged and which does not have sufficient area around it for wildlife to forage and feed on will fail to meet the purpose of a biodiversity corridor through which invertebrates, birds and mammals travel.

Summary

- The ANDP did not consider the AL/111/16 site for housing because the NDP team were advised they could not do so because it was within the strategic site, for which the Visioning Plan proposed a Country Park in this area.
- The statement that the NDP did not have any firm evidence base for inclusion of parcels of land is incorrect: A firm evidence base had been gathered over a period of years, including fieldwork and SWT data, and this particular site was at the time woodland.

- The Inspector recommended that the **Agricultural** fields East of Westergate be removed from the biodiversity corridor **pending** the Sustainability Appraisal for the draft Arun Local Plan. He did not require that the scrub / woodland be removed and it was agreed with Arun District Council that scrub / woodland should not be removed. The inclusion of this scrub / young woodland in the biodiversity corridor is NOT in contravention of the Inspector's recommendation.
- It is not true to say that the only element of the AL/111/16 land that meets Biodiversity corridor criteria is the eastern tree lined boundary. Regrettably this statement shows a woeful lack of understanding of the issues surrounding intricacy of biodiversity and the habitat needs of a range of wide range of species.

Aldingbourne Parish Council
May 2017