

## SAVE OUR SOUTH COAST ALLIANCE

# WHY AL6 SHOULD BE AN AGRICULTURAL ENVIRONMENTAL FARMING SCHEME

By

**Richard C. J. Pratt, BA (Hons), PGCE, MSc (Arch), FRGS**

Formerly of Birmingham School of Planning & Landscape Architecture and Brighton University Faculty of Built Environment

### ASSOCIATION MEMBERSHIP:

Town & Country Planning Association

Royal Geographical Society/ Institute of British Geographers

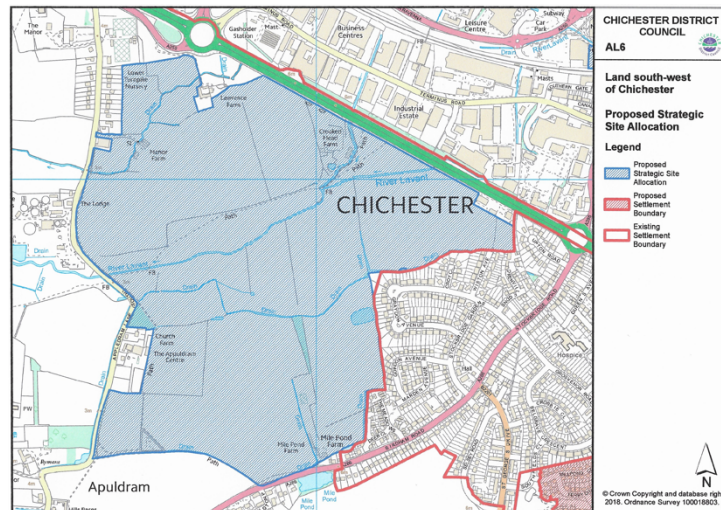


IMAGE: Scan from the official report from Chichester District Council

Essentially the proposed AL6 policy is for

“Approximately 85 hectares of land is allocated at land south-west of Chichester, as defined on the policies map, for an employment-led development to include approximately 33 hectares of employment land (suitable for B1b/B1c/B2 and B8 uses) and a minimum of 100 dwellings along with a new link road connecting the A27/A259 Fishbourne roundabout and A286 Birdham Road.”

This is contested on the following grounds

### 1. Agricultural land quality.

The Agricultural Land Classification map London and the South East (ALC007). This record was published by Natural England on 24 August 2010 shows the land to be Grade 1 (Excellent) with a residual of Grade 2 (Very good).

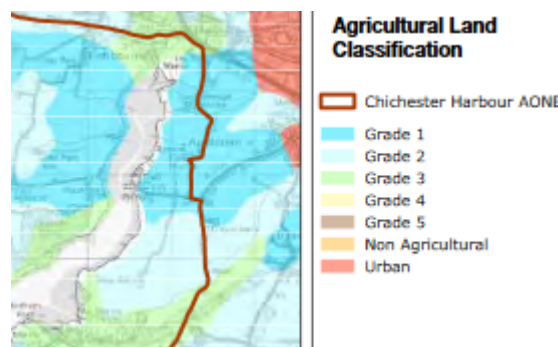
Source:

<https://environment.data.gov.uk/DefraDataDownload/?mapService=NE/AgriculturalLandClassificationProvisionalEngland&Mode=spatial>

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There can be little doubt that developing awareness of food security should result in placing greater emphasis upon the principle of assessing land for ‘highest and best value use’ Highly productive agricultural land should not be sacrificed until all other options have been exhausted.

Refer to Para 170b of the NPPF. This states “170. Planning policies and decisions should contribute to and enhance the natural and local environment by: b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;”. The NPPF gives the definition: “Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification.”



### 2. Nature Conservation

Birds associated with the neighbouring SPA are afforded protection under the guidance given by Natural England (Natural England Commissioned Report NECR207 - Functional linkage: How areas that are functionally linked to European sites have been considered when they may be affected by plans and projects - a review of authoritative decisions, first published 29 February 2016). Undoubtedly the proposed development site does have that functional linkage via the course of the River Lavant and in itself constitutes a significant wild life corridor close to the city itself. How much better would it be to promote the site for nature conservation and habitat de-fragmentation through a suitable agri-environmental scheme.

### 3. Flood Risk.

Being between 3m and 6m above chart datum (OS) and laying astride the once-braided and now canalised delta of the River Lavant which debouches directly to Chichester Harbour some 480m to the west, there is flood risk to this area. It is important to understand that there are two separate sources of flood risk and there is then a third ‘combination effect’. Firstly, sea-level rises will bring this area within risk of tidal flooding in a way not adequately modelled by CDC. Secondly increasing frequency of prolonged rainfall that has typified very recent years threatens to overwhelm a drainage pattern that has remained hitherto adequate. Thirdly a set of metrological conditions envisaged long ago to require the construction of the Thames Barrier (viz low-pressure, high spring tides and gale-force winds from a particular direction) and vastly increased storm-water flows would as likely overwhelm the area including the Apuldrum WWTW.

An aspect of both nature conservation and flood risk from rising sea level (RSL) has been noted in the Swedish study (Adela Nistora, 2018) as follows. An accelerated SLR will limit the capacity of coastal ecosystems to adapt, but, if they can keep pace with the future rise, coastal wetlands may be able to vertically accrete or migrate inland, as long as their migration is not impeded by topographical barriers, urban development or shoreline defence structures, which would result in “coastal squeeze” (Nagle 1998; Cooper et al. 2008; Zhang 2011; de Sherbinin et al. 2012; Blankespoor et al. 2014). The simple analysis performed in this study is sufficient to suggest that future SLR could have a significant impact on the South-East’s coastal ecosystems. However,

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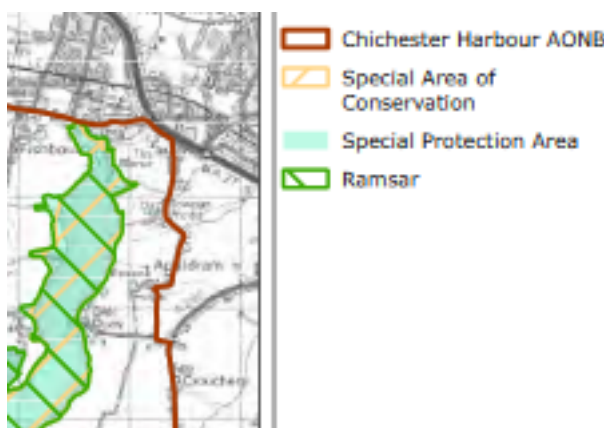
considering that coastal wetlands provide a large number of ecosystem services, including storm buffering, shoreline stabilisation, carbon sequestration and climate regulation (Brown et al. 2013; Blankespoor et al. 2014), their potential for landward migration in the region should be investigated in order to trigger action aimed at protecting them.

Source:

<http://lup.lub.lu.se/luur/download?func=downloadFile&recordId=8937311&fileId=8937312>

### 4. Sewerage.

The Apuldram WWTW is adjacent to the proposed site, but it has little if no further headroom to take connections from additional domestic or business premises. Such development as envisaged in AL6 would necessitate a significant enlargement of this WWTW which is within the AONB and adjacent to the following protective designations: Site of Special Scientific Interest, Special Protection Area, RAMSAR (Internationally important Wetland Protection Area) and Special Area of Conservation. Moreover, at an elevation of 3m above sea-level (HWST), and adjacent to the River Lavant itself would be vulnerable to flooding.



### 5. The Setting

The cathedral city and market town relies for its historical distinctiveness upon its setting betwixt South Downs, Chichester and Pagham Harbours. To permit urban sprawl right up to the boundary of the AONB at Apuldram will destroy this setting. Equally the symbolic significance of the city would be irreversibly harmed by rupturing the view from the harbour of the Cathedral spire and separate bell tower.



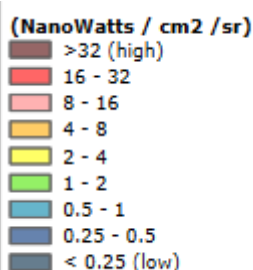
This is an historic view of incalculable value. The necessity of elevating a new spine road through the site would seal the fate of this visual connection.

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### 6. Dark Skies



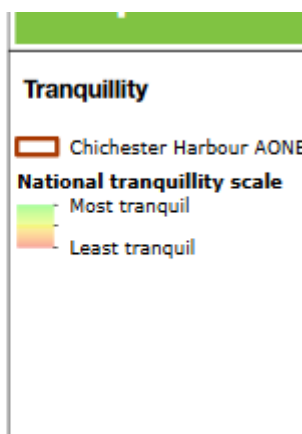
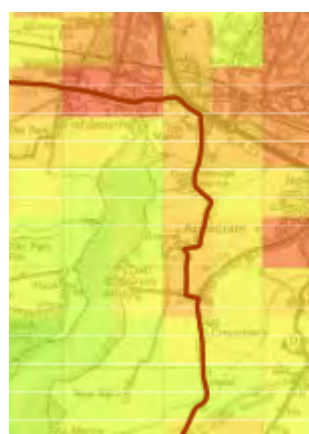
Chichester Harbour Management Plan (2019-2024) Third Review has policy on Dark Skies (PP09) and adjacent is a map plot of light spillage (p100) from the city spreading toward the protective designated zone in 2018. Development of AL 6 will further encroach the light spillage well into AONB by a commensurate 8 to 16 NanoWatts/cm<sup>2</sup>/sr.



### 7. Noise disturbance

The Dell Quay channel has so far enjoyed the highest levels of tranquillity within the whole AONB, save perhaps for parts of Thorney Island. The simple reason is that public access is greatly restricted on the Old Park Woods/Hook Farm side, whilst a single public footpath runs along the eastern side from Fishbourne to Birdham and beyond. The narrow Apuldram Lane whilst acknowledged as a rat-run at times is sufficiently narrow and serpentine to discourage heavier traffic.

The result of these factors can be clearly seen on the tranquillity map shown on p101 of the Chichester Harbour Management Plan (2019-2024) Third Review. Development for business and residences and a new spine road would restructure the pattern of urban disturbance across this precious corner of the harbour.







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### References

- CDC Policy AL6 may be found within the following document and the site map is to be found at p251 of that document  
[https://www.chichester.gov.uk/media/31058/Local-Plan-Review-2016-2035-Preferred-Approach/pdf/Local\\_Plan\\_Review\\_2016-2035\\_-\\_Preferred\\_Approach.pdf](https://www.chichester.gov.uk/media/31058/Local-Plan-Review-2016-2035-Preferred-Approach/pdf/Local_Plan_Review_2016-2035_-_Preferred_Approach.pdf)
- Agri-Environment Scheme Refs:  
<https://www.daera-ni.gov.uk/articles/agri-environment-schemes>  
and  
<https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Guide%20to%20the%20Environmental%20Farming%20Scheme%202020%20Agreements%20commencing%2001%20January%202020.PDF>
- National Policy Planning Framework:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/810197/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf)
- Chichester Harbour Management Plan (2019-2024) Third Review  
[https://www.conservancy.co.uk/assets/files/cms\\_item/613/d-Management\\_Plan\\_\(2019-24\)\\_Third\\_Review\\_r-bKLlo0MJzO.pdf](https://www.conservancy.co.uk/assets/files/cms_item/613/d-Management_Plan_(2019-24)_Third_Review_r-bKLlo0MJzO.pdf)
- Maps  
Land Use Consultants (LUC) in 2018.

DP for SOSCA  
01/05/20