

The Council are reminded of Chichester Harbour Conservancy's response to the Southbourne allocation submitted for the Preferred Approach consultation.

PART B

Please use a new form for each representation that you wish to make. Please note anonymous comments cannot be accepted. Any personal information provided will be processed by Chichester District Council in line with the General Data Protection Regulations 2018. More information is available at: <http://www.chichester.gov.uk/dataprotectionandfreedomofinformation>.

To which part of the document does your representation relate?

Page/ Paragraph Number:	Page 128, Southbourne Parish	Policy Reference:	AL13
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support

Object

Have Comments

Enter your full representation here giving details of your reasons for support/objection:

The Conservancy understand that Southbourne Parish Council will provide a map showing their preferred location of the minimum 1,250 dwellings that are proposed. The absence of this information at the time of the Local Plan consultation makes it difficult for the Conservancy to assess the likely impacts on the AONB. It was therefore resolved to object to the allocation for the following reasons. When the map is published, the Conservancy will reconsider its response. The proposed allocation may:

- Constitute a major development on the fringe of the AONB.
- Affect the buffer zone outside the AONB.
- Breach the policies of the current AONB Management Plan (LS1, BD1) and the emerging new AONB Management Plan (2019-2024).
- Be within the Site of Special Scientific Interest Impact Risk Zone, which affects the SAC, SPA and Ramsar designations.
- Detrimentially impact on wildlife with inadequate survey data to support the proposal. These surveys should not be left until a planning application is submitted. There is no mention of recreational disturbance.
- Detrimentially impact on existing long-distance towards South Downs National Park (one of the special qualities of the AONB). This inter-visibility is reciprocated; the views towards Chichester Harbour AONB must be protected.
- Contradict Paragraph 171, footnote 53, of the NPPF (2018) since some of the highest quality agricultural land in the country is found around Chichester Harbour. Footnote 53: "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality."
- Result in the urbanisation of the countryside (referring to the forthcoming updated AONB Landscape Character Assessment).
- Have unavoidable increased instances light, air, noise, and soil pollution.
- Suffer from inadequate wastewater provision and potential impact on water quality.
- Have inadequate landscaping and screening mitigation to justify the size of the development.

The LPA is advised that Section 85 of the CRow Act of 2000 requires relevant authorities to have regard to the purpose of AONBs 'in exercising or performing any functions in relation

to, or so as to affect, land' in these areas.

As the Statutory Joint Advisory Committee (JAC) for the AONB, Chichester District Council is hereby invited to re-consult with the Conservancy once the allocation map is published.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

The Conservancy objects the inclusion of this site pending the publication of the allocation map.

(Continue on separate sheet if necessary)

Declaration

I understand that any comments submitted will be considered by Chichester District Council in line with this consultation and will be made publicly available on their website www.chichester.gov.uk and may be identifiable by my name or organisation, if provided

Name (print):	RICHARD AUSTIN
Date:	06 FEBRUARY 2019

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