

Project	Southbourne, Chichester
Client	Church Commissioners for England
Document Title or Subject	Regulation 19 Ecology Note
Document Reference	110318-PEF-XX-XX-TTN-OE-000001
Revision	P01
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Date	17 th July 2026

1 Introduction

Pell Frischmann has been appointed by the Church Commissioners for England (“the Commissioners”) to provide ecology advice in relation to the Southbourne Development Plan Document (DPD), and particularly the assessment of site options through the Regulation 19 process at Southbourne, West Sussex.

The Commissioners strategic landholding at Southbourne covers approximately 69.3 hectares (ha) of land to the west of Southbourne village (the ‘site’). It is located within the administrative area of Chichester District Council (CDC), the Local Planning Authority (LPA).

This note has been prepared to review the ecological evidence base insofar as it relates to the identification and comparative assessment of site allocations, with a particular focus on the western site and its relative performance.

The purpose of this review is to consider whether the conclusions reached within the ecological evidence are appropriately evidenced and whether the approach adopted provides a robust basis for differentiating between sites. It also considers whether any material ecological considerations arise which would support an alternative approach to site selection.

The key documents reviewed as part of this Note include:

- Southbourne Allocation Development Plan Document 2021- 2039, Assessment Framework, April 2026 (the Assessment Framework)
- Southbourne Allocation Development Plan Document Regulation 19 Submission, June 2026 (the DPD)
- Southbourne Allocation DPD Habitats Regulations Assessment, April 2026 (the HRA)

2 Soundness and Policy Context

The NPPF is clear that plan-making should be underpinned by evidence, which is proportionate, transparent and capable of demonstrating that the most appropriate spatial strategy has been selected. This includes ensuring that ecological and biodiversity considerations are appropriately taken into account including policy and legislative requirements (such as compliance with the Conservation of Habitats and Species Regulations 2017 [as amended] as they pertain to National Network Sites).

3 Application of the Assessment Framework (Ecology)

The principle and format of the Assessment Framework provides a clear and structured approach to comparing sites and represents a helpful basis for decision-making. However, there are a number of elements where either the assessment does not fully reflect the evidence base (e.g. the HRA), or the relative performance of the options is overstated.

Each of the relevant biodiversity issues from the Assessment Framework are presented below in Sections 3.1 – 3.4. The tabulated text and red/amber/green (RAG) rating from the Assessment Framework is replicated, followed by analysis and identification of any limitations or errors. The RAG rating system used in the Assessment Framework is set out below.

Very strong	Makes a significant positive contribution to the objective
Strong	Makes a positive contribution
Reasonable	Makes a reasonable/neutral contribution
Poor	Makes a negative contribution
Very poor	Makes a significantly negative contribution to the objective

3.1 The Green Ring

Assessment Criteria	Scenario 1 (West)	Scenario 2 (East)	Scenario 3 (Mixed)
Provide the Green Ring for the benefit of both people and wildlife.	Would secure the western part of the Green Ring.	Would secure the eastern part of the Green Ring. The developer masterplan shows the green ring could effectively take two routes, one in between the existing edge of the settlement and the proposed allocation, and a wider loop around the outskirts of the allocation.	Would deliver large proportion of Green Ring. There would also be more space in order to properly incorporate the green ring into the layout.

The Assessment Framework appropriately identifies that the two individual Options (East and West) are capable of delivering the relevant sections of the Green Ring (and that the third, mixed scenario delivers a larger proportion).

3.2 Recreational Disturbance

Assessment Criteria	Scenario 1 (West)	Scenario 2 (East)	Scenario 3 (Mixed)
Mitigate impact on the Chichester Harbour SPA from recreational disturbance by creating suitable accessible	Development could deliver the level of SANG which is likely to be required by Natural England – 13.3 ha.	Development could deliver the level of SANG which is likely to be required by Natural England – 13.3 ha.	Development could deliver the level of SANG which is likely to be required by Natural England – 13.3 ha.

**natural greenspace
(SANG).**

The Assessment Framework appropriately identifies the potential for significant recreational disturbance from all Options, and that all are capable of delivering Suitable Alternative Natural Greenspace (SANG) to contribute to mitigating this effect.

The HRA appropriately screens in recreational disturbance as a likely significant effect and undertakes an appropriate assessment to determine whether an adverse effect on integrity would occur. This includes a detailed consideration of the SANG area and design considerations included within the DPD and acknowledges that financial contributions in line with the Solent Recreation Mitigation Strategy would also be made (this contribution is not considered within the Assessment Framework). The conclusion of no adverse effect on integrity for recreational disturbance (with the application of mitigation) is sound (given the evidence available at this stage). As set out in the Assessment Framework, the Western Option is equally capable of mitigating recreational disturbance impacts and would apply the same approach to mitigation (the same SANG standards and financial contributions).

3.3 Preserve Wildlife Corridors

Assessment Criteria	Scenario 1 (West)	Scenario 2 (East)	Scenario 3 (Mixed)
Preserve wildlife corridors.	No impact on wildlife corridors (as set out in both the SMNP and CLP). Potential to enhance wildlife corridors through BNG requirements.	Potential to enhance wildlife corridors through BNG requirements. SANG requirements overlap with the Neighbourhood Plan Wildlife Corridor, but the NP policy (SB13) makes reference to recreation, and therefore it is considered there is no conflict between the two. The Strategic Wildlife Corridor is narrower than the NP Wildlife Corridor, and will not be impacted by the development, and any overlap with SANG should be avoidable.	Potential to enhance wildlife corridors through BNG requirements. There should be plenty of space to avoid impacting upon the wildlife corridors.

The Assessment Framework appropriately identifies the elevated value of the Western Option due to the absence of any potential conflict with wildlife corridors. Within this issue, it would also be appropriate to consider any potential conflict with the emerging Sussex Local Nature Recovery Strategy. The West Sussex Local Habitat Map which underpins the LNRS includes Areas that Could become Important for Biodiversity (ACIB) which broadly align with the CLP wildlife corridors – but with some areas of deviation.

For the Western Option, the boundary of the ACIB aligns with the wildlife corridor and therefore the same benefit set out in the Assessment Framework applies. For the Eastern Option, the ACIB lies between the SMNP and CLP wildlife

corridor boundaries, and therefore the potential for conflict should be considered. In particular, the area of the ACIB along Priors Leaze Lane appears close to the development area set out in the DPD framework masterplan.

3.4 Protect and / or mitigate existing wildlife and biodiversity.

Assessment Criteria	Scenario 1 (West)	Scenario 2 (East)	Scenario 3 (Mixed)
Protect and / or mitigate existing wildlife and biodiversity.	This site would result in significant loss of land which has been identified as a Brent Geese Secondary Support area, though with a potential area of mitigation north of the A27. It is not clear to what extent the proposed mitigation land will constitute satisfactory off-setting for the impact. If it is not sufficient, then an additional financial contribution may be required.	Existing ecological constraints could be mitigated through design/layout. The main site promoter submitted an ecological report demonstrating that their site does not form part of the secondary support area, which has been agreed by Natural England.	This site would result in some loss of land of Brent Geese Secondary Support area. A smaller area would probably be impacted when compared with allocating just the western site option, which would improve the chances of mitigating the impact.

Although titled Wildlife and Biodiversity, the Assessment Framework appears to only consider impacts to the wader and brent goose network. This is an important consideration, however it is not the only one which should be taken into account when considering the impact of any Option on biodiversity.

With regard to waders and brent geese alone, the evaluation of the Western Option (makes a significant negative contribution to the objective) is overstated. Detailed information¹ has been presented setting out the proposed approach to mitigation for the Western Option. This approach fully accords with the Solent Waders and Brent Goose Strategy and is supported by Hampshire and Isle of Wight Wildlife Trust. It is also consistent with a long history of planning and appeal decisions resulting in the creation of mitigation areas for the loss of wader and brent goose network sites. Given the objective states 'protect and/or mitigate' the evaluation for the Western Option should be reasonable/neutral at worst.

For the Eastern Option, the Assessment Framework states only that the site is not part of the same Secondary Support Area. However, the DPD HRA concludes that likely significant effects resulting from loss of functionally linked land cannot be ruled out because of the potential presence waders and/or brent geese. Thus, the potential for loss of functionally linked land requires Appropriate Assessment (in the same manner as the Eastern Option). The Appropriate Assessment identifies that waders which form part of the qualifying bird assemblage have been recorded on site, with peak counts of 18 lapwing and 2 snipe. This represents 0.75% of the Chichester Harbour lapwing population (20/21-24/25 WeBS 5-year mean) and 3.3% of the Chichester Harbour snipe population. The HRA goes on to conclude that there is no impact on integrity on the basis of these numbers (although it does not include the latest 5-year means) – however, the use of the peak counts alone is not a sound basis for this conclusion. Firstly, the survey data is taken from five surveys undertaken during a single winter. Surveys for this region should take place twice per month from October to March for a total of 12 surveys per winter and should cover multiple winters. Secondly, the presence of these birds would not result in the site having no value as functionally linked land. Under the Solent Waders and Brent Goose Strategy, it would still qualify as a Low Use Site (there are currently insufficient numbers to exceed 1% of the assemblage at the time of designation of the

¹ Pell Frischmann, 2025. 106923-PEF-ZZ-RP-Z-00004 Ecology Technical Note: Wintering Birds.

SPA). The loss of a Low Use Site would still require mitigation in the same manner as the loss of a Secondary Support Area for the Western Option (the mitigation itself would simply be of a lower minimum standard).

Given the size of the site, it is likely that the Eastern Option could provide appropriate mitigation, however this should be evidenced. The proposed approach to mitigation should be set out within the DPD and must also be assessed within the HRA to make sure that it is capable of preventing a significant effect on the Chichester and Langstone Harbours SPA. It is also important to note that any mitigation land provided for waders cannot also be used for SANG or other accessible public open space as it must be safeguarded from disturbance.

The Assessment Framework does not discuss the potential for impacts on functionally linked land for Singleton and Cocking Tunnels SAC. This is considered within the HRA however. As acknowledged within the HRA, the wider consultation zone for Singleton and Cocking Tunnels (within which significant impacts on flightlines and habitats should be considered) is 12km. The Western Option is outside this zone but the Eastern Option is not. The HRA screens out likely significant effects based on distance and the presence of the A27, however this is not sound. The Eastern Option is within the consultation zone, and therefore significant effects should be considered. If the A27 were considered a significant barrier (as the HRA suggests) then all land south of the A27 would be excluded from the consultation zone – however it is not. There are numerous sites south of the A27 where consideration of significant effects upon the SAC has been required by Chichester District Council (e.g. appeals for Land West of Drift Lane and Land East of Broad Road, Chidham – APP/L3815/W/22/3295004 and APP/L3815/W/22/3295000). There are records of Western barbastelle (qualifying species for the SAC) close to the Eastern Option (for example south of the railway line) and they are known to use the Ham Brook corridor. In order for the DPD to be sound, it should consider the potential for significant impacts upon the SAC and include appropriate avoidance and/or mitigation measures in line with the objective.

3.5 Assessment Framework Conclusion

Despite some limitations (e.g. not considering the Sussex Nature Recovery Strategy), the assessment criteria for The Green Ring, Recreational Disturbance and Preserve Wildlife Corridors are correctly rated within the Assessment Framework.

The criterion for Protect and / or mitigate existing wildlife and biodiversity is not, with a significantly overstated difference assumed between the Eastern and Western Options. This criterion should be reassessed as follows:

Assessment Criteria	Scenario 1 (West)	Scenario 2 (East)	Scenario 3 (Mixed)
Protect and / or mitigate existing wildlife and biodiversity.	Existing ecological constraints (with the exception of SPA/SAC features) could be mitigated through the design/layout. This site would result in the loss of a Brent Geese Secondary Support area. This loss could be mitigated through the provision of a new ecological area north of the A27 (which	Existing ecological constraints (with the exception of SPA/SAC features) could be mitigated through the design/layout. This site would result in the loss of land used by wading birds which form part of the qualifying bird assemblage of Chichester and Langstone Harbours SPA, albeit not of the value of a Secondary Support Area. This loss	Existing ecological constraints (with the exception of SPA/SAC features) could be mitigated through the design/layout. This site would result in the partial loss of both the brent goose Secondary Support Area and wading bird habitat. This loss could be mitigated through the creation of dedicated on site areas for both brent geese and wading birds

	does not form part of the proposed SANG area). This site would not have any potential for impacts upon Singleton and Cocking Tunnels SAC.	could be mitigated through the creation of dedicated on site wading bird habitat – although this area could not form part of the proposed SANG area. This site could result in impacts upon barbastelle bats associated with Singleton and Cocking Tunnels SAC. Mitigation could be provided as part of the design/layout to make sure that potential flightlines and habitats are preserved.	– although these areas could not form part of the proposed SANG area. This site could result in impacts upon barbastelle bats associated with Singleton and Cocking Tunnels SAC. Mitigation could be provided as part of the design/layout to make sure that potential flightlines and habitats are preserved.
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4 The HRA

The HRA reaches sound conclusions during Stage 1 Screening and Stage 2 Appropriate Assessment for most impact pathways. However, as discussed above, there are areas where the conclusions are not sufficiently evidenced or justified.

The conclusion of the Appropriate Assessment that there is no adverse effect on the integrity of Chichester and Langstone Harbours SPA through loss of functionally linked land (as a result of development of the Eastern Option) is based on low recorded bird numbers from an insufficient number of surveys. However, even with the peak counts recorded, an adverse effect on integrity cannot be ruled out for the Eastern Option without mitigation (based on the thresholds used within the Solent Wader and Brent Goose Strategy).

In a similar vein, the justification to screen out likely significant effects upon Singleton and Cocking Tunnels SAC is not robust. The Eastern Option lies within the wider consultation zone for the SAC and therefore should include measures to prevent significant impacts such as severance of connectivity

Finally, although water pollution through nutrient impacts from wastewater is assessed, there is no consideration of water pollution impacts from surface water. This is an important consideration given that the Eastern Option lies adjacent to Ham Brook which flows directly into Chichester Harbour.

5 Conclusion

The Assessment Framework does not fully take into account the evidence base when assessing the relative ability of the Options to meet the ecological objectives.

It acknowledges wildlife corridors but does not consider the Local Nature Recovery Strategy. It also fails to acknowledge the potential for significant impacts from the Eastern Option on functionally linked land for both Chichester and Langstone Harbours SPA and Singleton and Cocking Tunnels. For Chichester and Langstone Harbours SPA, both the Eastern and Western Options result in the loss of habitat for waders and/or brent geese and both require mitigation. For Singleton and Cocking Tunnels SAC, only the Eastern Option has the potential to cause impacts. Therefore, the relative assessment

significantly overstates the difference between the two Options. The reassessment at 3.5 demonstrates how the Options should be assessed as much closer in their relative contribution to the objective.

There are also a number of elements within the HRA which are currently unsound including the justification for no adverse effect on integrity for Chichester and Langstone Harbours SPA (through loss of functionally linked land), no likely significant effect on Singleton and Cocking Tunnels SAC (through impacts to functionally linked land) and the absence of consideration of surface water impacts.

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Report Ref.		110318-PEF-XX-XX-TTN-OE-000001				
File Path		Document5				
Rev	Suit	Description	Date	Originator	Checker	Approver
P01	S3	Issue	17-07-26	DW	CG	DW

Ref. reference. Rev revision. Suit suitability.