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**CHICHESTER
HARBOUR
CONSERVANCY**

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Planning Policy Divisional Manager
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BY E-MAIL ONLY

15th July 2026

Dear Mr Whitty,

Publication of the proposed submission Southbourne Allocation Development Plan Document for consultation under Regulation 19 of the Town and Country Planning Regulations (Local Planning) (England) 2012

Thank you for the opportunity to comment on the proposed submission Southbourne Allocation Development Plan Document.

General comments

The proposed allocation location as set out under draft Policy SA1 – East of Southbourne - is the least harmful scenario of the options previously considered from the perspective of the setting of the Chichester Harbour National Landscape (CHNL) due to being limited to land north of the railway line, and therefore no objection is raised in principle, subject to careful design and thought being given to impacts on the setting of the CHNL, as set out in Local Plan Policy A13.

However, we are amazed that, despite the proposed huge increase to the size of Southbourne under this allocation, there is still no road bridge being proposed over the railway line. This seems very short-sighted and will be likely to cause traffic problems including congestion and the resulting noise and air pollution, which will impact the wider area including the nearby CHNL to the south, as well as resulting in an unsatisfactory environment for future occupiers of the development and negatively impacting the existing residents of Southbourne.

We are pleased that the Landscape Gap Assessment Update (September 2025) has been carried out to help confirm if the landscape gaps set out in the 2019 study remain relevant and to fulfill the requirements of Policies NE3 and A13 of the Local Plan to ensure that Southbourne's landscape gaps are retained. However, we have concerns relating to the limited extent that this is carried through into the draft DPD, which we believe would result in the DPD failing to meet the soundness tests set out in NPPF paragraph 36, namely it would not be justified as it would ignore much of the evidence regarding the landscape gaps around Southbourne including the Council's own recent Landscape Gaps Assessment Update. It would also not be consistent with National Policy (Chapter 15 of the NPPF which seeks to conserve and enhance the natural environment including the setting of Nationally protected Landscapes).

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With regard to wastewater – the proposed development should not be allowed to proceed until the necessary upgrades to the capacity of Thornham Wastewater Treatment Works have been completed.

Landscape gap east of Southbourne

We support the inclusion of the precise boundaries of this landscape gap boundary within the DPD; but consider that the proposed gap should be increased westwards to include the land between the railway line and the A259 to the west of the gap shown, as this is undeveloped rural land which contributes to the separation of settlements and the rural setting of the CHNL, and remains vulnerable to development, as demonstrated by recent application 23/02114/FUL – which was refused on grounds including erosion of the perceived gap between settlements, demonstrating its importance as part of the landscape gap:-

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- 3) The proposal, by reason of its location, overdevelopment of the site and absence of lighting information, would erode the perceived gap between settlements, harm the rural character of the area and fail to demonstrate that it would not harm the dark night skies of the Chichester Harbour National Landscape (AONB) and South Downs National Park. This is in conflict with Policy 48 of the Chichester Local Plan 2014-2029, Policy 4 of the Southbourne Parish Neighbourhood Plan 2014 - 2019, Policy SB17 of the Southbourne Neighbourhood Plan (Referendum Modified) 2014-2019, NPPF and the first statutory purpose of the South Downs National Park.

Further reasons this area should be included in the landscape gap to the east of Southbourne include:

- The Chidham and Hambrook Neighbourhood Plan (CHNP) has suggested that this area be included in the Southbourne Parish as a Landscape Gap adjoining the gap proposed in the draft CHNP (only reason for it not being included in the draft CHNP is that it falls outside of that Parish), see area shaded beige below:-



Figure 15: Landscape gap between Nutbourne East and the Parish boundary

- The area forms part of Area 85 in the CDC Landscape Capacity Study update 2019 and shows as having medium/high visual sensitivity; medium/high landscape value; and low capacity for landscape change due to various factors including impact on the wider separation between Nutbourne West from Nutbourne East, see map below:-

Sub-area map:

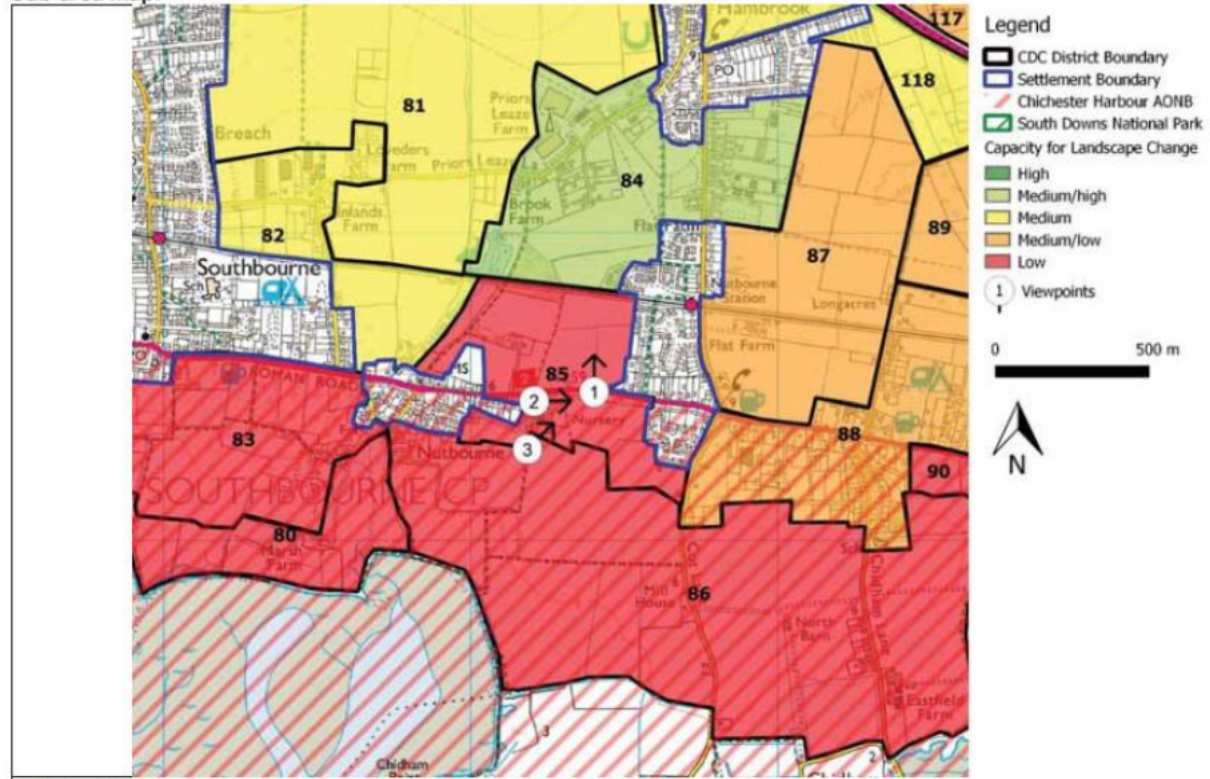


Figure: 85 Capacity of landscape to accept change and location of photographic viewpoints

Above: Extract from CDC Landscape Capacity Study March 2019

Landscape Gap west of Southbourne

We note the recent Landscape Gap Assessment Update for this DPD carried out in September 2025 and point out that the Hermitage and Southbourne Gap was also included in the Study and it was found that the rural quality and visual separation of the gap are still fully intact. Current application 25/03010/OUTEIA is proof of the ongoing vulnerability of this gap as a result of constant attempts to develop it with housing. Therefore, **please include this gap in the Southbourne Allocation DPD** (as per the 2025 updated map on page 11 of the Landscape Gap Assessment Update for the Southbourne Allocation DPD (September 2025)) to give this remaining small gap between settlements the protection it so desperately needs from further development.

Recent developments (e.g. Highgrove Farm Bosham) as well as approved developments in the pipeline (e.g. land East of Broad Road and land West of Drift Lane Chidham) have already eroded significant parts of the landscape gaps along the A259 corridor/Chichester Harbour National Landscape (NL) boundary, which is seriously compromising the rural setting of the NL. The remaining landscape gaps along the A259 corridor continue to be under intense pressure for development and without precise definition of the boundaries as soon as possible, there will still not be sufficient policy protection for these remaining areas, with Local Plan Policy on Landscape

Gaps (NE3) not being properly fulfilled. Safeguarding the remaining landscape gaps will be vital in avoiding coalescence and maintaining the separate identity of settlements, as well as safeguarding the rural setting of the Chichester Harbour National Landscape.

Local Plan Policy NE3 states that ***'the precise boundaries of landscape gaps will be defined in either a Site Allocation DPD or through Neighbourhood Plans.'***

This DPD is the opportunity to identify the landscape gaps on BOTH sides of Southbourne, given the failure of the Local Plan to define the boundaries of landscape gaps and the non-prospect of it happening through the Southbourne Neighbourhood Plan in time to safeguard these important gaps from further erosion. Failure to do so would in our view render the DPD unsound under the requirements of the NPPF.

Yours sincerely,

A black rectangular box redacting the signature of the Principal Planning Officer.

**Principal Planning Officer
Chichester Harbour Conservancy**