	Representation Form Southbourne Allocation Development Plan Document Regulation 18 Stage	**Ref:** **(For official use only)**

The consultation on the Southbourne Allocation Development Plan Document: Proposed Submission will run from 31st October 2024 to 12th December 2024. The document and more information on the consultation can be viewed on our website https://www.chichester.gov.uk/southbourne-allocation-development-plan

All comments must be received by 5pm on Thursday 12th December 2024.

There are a number of ways to make your comments:

- Comment on the document on the internet using our online consultation website https://www.chichester.gov.uk/planningpolicyconsultations (**Recommended)**
- Post a copy of this form to us at: Planning Policy Team, Chichester District Council, East Pallant House, 1 East Pallant, Chichester, West Sussex, PO19 1TY

How to use this form

Please complete Part A in full. Please note anonymous comments cannot be accepted, a full address including postcode must be provided.

Please complete Part B overleaf. The questions cover the 4 separate documents and are separated into sections for each document. Each section has subheadings to denote the chapter that the questions relate to, and each question is labelled with the section number, question number and page number. These can be used to navigate through the corresponding documents.

For more information, or if you need assistance completing this form, please contact the Planning Policy Team by email at planningpolicy@chichester.gov.uk or telephone 01243 785166.

Part A

1. Personal Details* **If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*		2. Agent's Details (if applicable)
Title	Miss	
First Name	Sophie	
Last Name	Moore	
Job Title	Higher Officer- Sustainable Development	

(where relevant) Organisation	Natural England	
Address Line 1	Guildbourne House	
Line 2	Chatsworth Road	
Line 3	Worthing	
Line 4	West Sussex	
Post Code	BN11 1LD	
Telephone Number	[redacted]	
E-mail Address	[redacted]	

Part B

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.

Section 1: Southbourne Allocation Development Plan Document (Main Document)

4. Visions and Objectives

4.11. Question 1 Do you agree with the vision and objectives set out? If not, Please set out how you think they should be amended.

Yes		No	X

Natural England is broadly satisfied with the vision and objectives set out in the submitted document; however, we would support a stronger reference to protected landscapes in the vision given the developments location and the enhanced duty to 'seek to further the purpose' of National Landscapes (Section 245, Levelling-up and Regeneration Act 2023).

Similarly, we would welcome clearer consideration of the need to ensure that any future development ensures that designated sites, protected species and priority habitats are safeguarded as far as practicable and are considered in line with paragraph 186 of the NPPF.

Notwithstanding the above, Natural England supports the holistic approach to environmental matters within Section 4, and the inclusion of specific objectives relating to 'transport and sustainable travel', climate change moving towards net zero carbon living and the multifunctional benefits associated with the proposed continuous Green Ring.

(Continue on a separate sheet /expand box if necessary)

5. Scenario 1: Land to the West

5.22. Question 2 Do you agree with the list of benefits or challenges set out above? (Paragraph 5.12 – 5.21)
Please set out reasons for the answer given.

Yes [X] **No** [ ]

Following a review of Scenario 1, we agree that the delivery of this option has the potential to provide opportunities for better connections with nature for both the existing and new residents of Southbourne, through the delivery of the western section of the Green Ring as well as quality green open space provision and the retention of existing PROW. Natural England supports the delivery of options that have the potential to facilitate connections between people and nature within the wider community. We also agree that the current ownership of the land would help to facilitate a more 'joined up approach' to development, and Natural England would strongly encourage benefits to people and nature being considered in a manner that ensures cohesion and delivery of multiple benefits at scale.

Your authority has identified that a large proportion of the site is designated as a 'Secondary Support Area' by the Solent Wader and Brent Geese Strategy and that any loss will require mitigating, and Natural England agrees that this is a challenge that will need addressing and considering in line with the mitigation hierarchy (paragraph 186 of the NPPF).

(Continue on a separate sheet /expand box if necessary)

5.22. Question 3 Are there other benefits or challenges that you think should also be included?
Please set out reasons for the answers given.

Given the location of the site, any new overnight accommodation will have a likely significant effect upon the Chichester and Langstone Harbour SPA and Ramsar site, as well as the Solent Maritime SAC, due to increased levels of recreational disturbance and treated effluent being discharged into the site. Nutrient neutrality has the potential to be addressed via on-site land use change, such as woodland planting. Natural England would encourage the consideration of mitigation options that can provide multiple benefits. For example, woodland planting (or other appropriate land use change) can have the additional benefit of providing on-site greenspace to attract some recreational activity away from the Solent designated sites (as part of a mitigation package for recreational disturbance impacs) while addressing increased levels of nutrients.

However, we advise that given the scale of the development and its proximity to coastal designated sites, standard financial contributions and on-site greenspace provision are unlikely to wholly mitigate the impact of increased recreational disturbance alone, and may require additional bespoke mitigation measures in line with the Solent Recreation Mitigation Strategy (December 2017). In addition, as the proposed development site for Scenario 1 is smaller than the other scenarios being considered – but still delivers the same number of dwellings – we would suggest that the potential challenges with delivering onsite mitigation should be considered, including whether offsite solutions may be required instead.

It is important to note that, although built development will not cover the entirety of the 'Secondary Support Area', changes in land use that do not constitute built development may still constitute a loss of suitable foraging habitat for birds identified within the Solent Wader and Brent Goose Strategy. It is not currently clear what the plans are for the remainder of the Broad Location of Development (BLD), but even the provision of open greenspace is likely to adversely impact upon the suitability of the site (as a secondary support area) as there is likely to be a reduction in the availability of appropriate foraging resource as a result of increased recreational activities in this area.

Having used our Agricultural Land Classification predictive tool, we would advise at this stage that this scenario would result in the loss of primarily Grade 1 agricultural land rather than Grade 1 and 2. In line with Policy 48 in your authority's currently adopted Local Plan, development of poorer quality land should be fully considered in preference to best and most versatile land and this should be evidenced within application documents.

Given that the Southbourne Broad Location of Development (BLD) is located within the setting of both the South Downs National Park to the north, and the Chichester Harbour National Landscape (formerly 'Area of Outstanding Natural Beauty') to the south, all development scenarios will need to consider potential landscape impacts. In line with Paragraph 182 of the National Planning Policy Framework (NPPF), development within the setting of protected landscapes should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. We would therefore expect any potential impacts to be assessed in line with Paragraph 183 of the NPPF and Section 245 of the Levelling-up and Regeneration Act 2023.

(Continue on a separate sheet /expand box if necessary)

5.22. Question 4 In this scenario, what do you think would be the challenges or issues if there wasn't a vehicular bridge over the railway line? Please set out reasons for the answers given.
This question is outside of Natural England's remit, and we therefore will not be providing comment. (Continue on a separate sheet /expand box if necessary)

5. Scenario 2: Land to the East

5.34. Question 5 Do you agree with the list of benefits and challenges set out above? (Paragraph 5.24 – 5.33)
Please set out reasons for the answers given.

Yes	X	No	

Following a review of Scenario 2, Natural England advise that we agree with the potential benefits as laid out in the DPD. Namely, this option may provide opportunities for better connections with nature for both the existing and new residents of Southbourne, through the delivery of the eastern section of the Green Ring with the incorporation of locally protected hedgerows, historic orchards and local green spaces. The provision of foot and cycle paths along with attractive green spaces has the potential to benefit both people and wildlife, both within and beyond the development site. We support the consideration of how this scenario may integrate existing water courses to allow for a blue and green infrastructure strategy.

We note that the challenges currently outlined within the DPD are largely outside of our remit to comment on, however, we concur that the development of this site would result primarily in the loss of Grade 1 Best and Most Versatile Agricultural Land. In line with Policy 48 in your authority's currently adopted Local Plan, development of poorer quality land should be fully considered in preference to best and most versatile land and this should be evidenced within application documents.

In addition, there are further environmental challenges that should be considered, as described in the section below.

(Continue on a separate sheet /expand box if necessary)

5.34. Question 6 Are there other benefits and challenges that you feel should also be included?
Please set out reasons for the answers given.

Given the location of the site, any new overnight accommodation will have a likely significant effect upon the Chichester and Langstone Harbour SPA and Ramsar site, as well as the Solent Maritime SAC, due to increased levels of recreational disturbance and treated effluent being discharged into the site. Nutrient neutrality has the potential to be addressed via on-site land use change, such as woodland planting. Natural England would encourage the consideration of mitigation options that can provide multiple benefits. For example, woodland planting (or other appropriate land use changes) can have the additional benefit of providing on-site greenspace to attract some recreational activity away from the Solent designated sites (as part of a mitigation package for recreational disturbance impacs) while addressing increased levels of nutrients.

However, we advise that given the scale of the development and its proximity to coastal designated sites, standard financial contributions and on-site greenspace provision are unlikely to wholly mitigate the impact of increased recreational disturbance alone, and may require additional bespoke mitigation measures in line with the Solent Recreation Mitigation Strategy (December 2017). In addition, although the proposed development site for Scenario 2 is larger than Scenario 1 it is still relatively small in comparison with Scenario 3 and is still delivering the same number of houses. We would suggest that the potential challenges with delivering onsite mitigation should be considered if this scenario is to be taken forward, including whether offsite solutions may be required instead.

Natural England advise that whilst this scenario does not appear to directly impact any areas identified within the Solent Wader and Brent Goose Strategy, this does not necessarily mean that the land is not functionally linked to Chichester & Langstone Harbour SPA and Ramsar site. We would consider the entire Broad Location of Development (BLD) to be suitable for use by designated bird features and therefore further survey work would be required to determine the scale of impact.

Given that the Southbourne Broad Location of Development (BLD) is located within the setting of both the South Downs National Park to the north, and the Chichester Harbour National Landscape (formerly 'Area of Outstanding Natural Beauty') to the south, all development scenarios will need to consider potential landscape impacts. In line with Paragraph 182 of the National Planning Policy Framework, development within the setting of protected landscapes should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. We would therefore expect any potential impacts to be assessed in line with Paragraph 183 of the NPPF and Section 245 of the Levelling-up and Regeneration Act 2023.

(Continue on a separate sheet /expand box if necessary)

5.34. Question 7 In this scenario, what do you think would be the challenges or issues if there wasn't a vehicular bridge? Please set out reasons for the answers given.
This question is outside of Natural England's remit, and we therefore will not be providing comment. (Continue on a separate sheet /expand box if necessary)

5. Scenario 3: Mixed Scenario

5.46. Question 8 Do you agree with the list of benefits and challenges set out above? (Paragraph 5.35 – 5.45)
Please set out reasons for the answers given.

Following a review of Scenario 3, we agree that the delivery of this scenario has the potential to provide greater benefit to both nature and people with the delivery of the entire Green Ring around Southbourne Parish. In addition, we agree that this scenario is likely to have a lesser impact upon the setting of both Chichester Harbour National Landscape and South Downs National Park given that 800 homes are to be provided over a greater hectarage and the pattern of development is aligned with the existing shape of Southbourne.

We are also concerned that the existence of multiple landowners and planning applications across this site could result in a reduced benefit for nature and people, with a likely piecemeal approach to mitigating impacts to designated sites and green infrastructure provision and agree that development should come forward in a coordinated manner to ensure that these elements are dealt with as strategically as possible. Wherever possible, Natural England would strongly encourage benefits to people and nature being considered in a manner that ensures cohesion and the delivery of multiple benefits at scale.

(Continue on a separate sheet /expand box if necessary)

5.46. Question 9 Are there other benefits and challenges that you feel which should also be included?
Please set out reasons for the answers given.

As with the scenarios discussed above, Scenario 3 will also have a likely significant effect upon the Chichester & Langstone Harbour SPA and Ramsar site, as well as the Solent Maritime SAC, due to the increased levels of recreational disturbance and treated effluent being discharged into the site. Given the larger site area (198.2ha) there is a greater likelihood that mitigation such as greenspace provision or woodland planting will be able to be delivered on site, when compared with Scenarios 1 & 2. In addition, there is greater opportunity for large scale green and blue infrastructure provision which has multiple benefits, for example nature-based solutions to flooding.

It is important to note that, although built development will not cover the entirety of the 'Secondary Support Area', changes in land use that do not constitute built development may still constitute a loss of suitable foraging habitat for birds identified within the Solent Wader and Brent Goose Strategy. It is not currently clear what the plans are for the remainder of the Broad Location of Development (BLD), but even the provision of open greenspace is likely to adversely impact upon the suitability of the site (as a secondary support area) as there is likely to be a reduction in the availability of appropriate foraging resource as a result of increased recreational activities in this area.

Having used our Agricultural Land Classification predictive tool, we would advise at this stage that this scenario would result in the loss of primarily Grade 1 agricultural land rather than Grade 1 and 2. In line with Policy 48 in your authority's currently adopted Local Plan, development of poorer quality land should be fully considered in preference to best and most versatile land and this should be evidenced within application documents.

(Continue on a separate sheet /expand box if necessary)

5. Site Scenario Options

5.47. Question 10 Which scenario (Land to the West, Land to the East or Mixed Scenario) do you feel should be selected as the preferred option for allocation? Please rank from 1st (most preferable) to 3rd (least preferable).
Please set out the reasons for your ranking.

1st (Most Preferable)	Mixed Scenario
2nd	Land to the East
3rd (Least Preferable)	Land to the West

This ranking has been given primarily on the basis that Scenario 3 (Mixed Scenario) provides greater opportunities to deliver on-site benefits for both nature and people, which would be harder to achieve in the other two scenarios given their size. In addition, Scenario 3 has the benefit of following the existing layout of Southbourne which should help to minimise impacts upon protected landscapes.

It is however important to note that all three scenarios will have similar impacts in terms of nutrient neutrality and recreational disturbance, as well as the potential for land to be functionally linked to Chichester Harbour SPA and Ramsar site. As mentioned, Scenario 3 may find it easier to avoid or mitigate these impacts due to the larger amount of land available and there is likely to be greater opportunities for wildlife connectivity across the site.

We would also like to highlight that it is currently unclear what would happen to the land in Scenario 1 if Scenario 2 was to be taken forward, or vice-versa, particularly as planning applications have already been approved within both Broad Locations of Development. It should be noted that if, eventually, both scenarios are to be taken forward leading to 1600 new dwellings in this area then the impact upon both South Downs National Park and Chichester Harbour National Landscape would be significantly greater.

(Continue on a separate sheet /expand box if necessary)

Section 2: Southbourne Allocation Development Plan Document (Appendix A: Assessment Framework)

2. Opportunities and Constraints

2.39. Question 11 Do you agree with the list of opportunities or constraints set out above? (Paragraph 2.38)

We agree with the list of opportunities and constraints provided on pages 19, 20 and 21 of the Assessment Framework, however we would advise that some of the identified constraints (e.g. the Strategic Wildlife Corridors) should not be viewed as barriers to development. Instead, the proposed Scenarios have the potential to deliver valuable opportunities to create and reinforce links between natural habitats, thereby increasing ecosystem resilience and connectivity.

(Continue on a separate sheet /expand box if necessary)

2.39. Question 12 Are there any others (opportunities or constraints) which should be mentioned in relation to either category?

As highlighted in our comments to the three scenarios above, we would consider the requirement to deliver mitigation for both nutrient neutrality and recreational disturbance impacts a potential constraint on the site. However, as with our comments in response to Question 11, we would also strongly recommend that mitigation options (for both nutrient impacts and recreational disturbance), should consider how they can be delivered in a way that provides multiple benefits to people and nature i.e., the provision of high quality and biodiverse open greenspace.

In addition, we would like to flag that areas within the Broad Location of Development (BLD) area, but not identified within the Solent Wader and Brent Goose Strategy, still have the potential to provide functional linkage to the Chichester and Langstone Harbour SPA and Ramsar site (as well as being an identified secondary support area for Brent Geese). Further survey work would be required to determine whether the site is functionally linked and whether mitigation would be required for its loss.

(Continue on a separate sheet /expand box if necessary)

3. Infrastructure Requirements

3.12. Question 13 Do you have any comments on the infrastructure requirements set out above (Paragraph 3.1 – 3.11), including how they could/should be most effectively delivered?
We note that your authority has highlighted the need for natural greenspace to be provided, which we presume is to mitigate the impact of increased recreational disturbance on Chichester & Langstone Harbour SPA and Ramsar site. While Suitable Alternative Natural Greenspace (SANG) is a potentially suitable mitigation method, its effectiveness in relation to coastal designated sites is assessed on a case-by-case basis given that on-site greenspace typically only attracts around one third of would-be coastal visitors. In some other coastal locations, Natural England has advised that a SAMMS+ approach to be implemented. We recommend that you consult the Solent Recreation Mitigation Strategy (December 2017) for further information. With regard to Biodiversity Net Gain (BNG) requirements we recommend that the Biodiversity Gain Hierarchy is followed to ensure that BNG is achieved in a structured manner and that as much of the BNG requirement is delivered on site as possible. In the event that Scenario 2 or 3 is taken forward, a strategic approach to BNG could be beneficial to maximise benefits for nature across multiple application sites. It should also be noted that BNG can be delivered in combination with mitigation for nutrient impacts and SANG provision, so long as non-BNG outcomes only contribute up to a point of 'no net loss'. We are concerned that the infrastructure requirements mention the provision of compensatory habitat in relation to recreational disturbance impacts on Chichester and Langstone Harbour SPA. It is Natural England's opinion that the potential impacts of recreational disturbance arising from this development, subject to the provision of appropriate mitigation, can be mitigated and we would therefore not expect there to be a need to deliver 'compensatory habitat'. Furthermore, in line with paragraph 186(a) of the NPPF, impacts should be **avoided in the first instance**, then adequately mitigated for and finally compensation measures provided **as a last resort.** (Continue on a separate sheet /expand box if necessary)

4. Assessing the Options

4.28. Question 14 Do you have any comments on the assessment methodology?
Natural England does not have any comments to make on the assessment methodology. (Continue on a separate sheet /expand box if necessary)

6. Assessment Framework Summary

6.1. Question 15 Do you have any comments on the site assessment scoring set out above? (Tables contained within Chapter 6)
Natural England does not have any comments to make on the site assessment scoring.

(Continue on a separate sheet /expand box if necessary)

Section 3: Southbourne Allocation Development Plan Document (Appendix C: Interim SA Report accompanying the Issues and Options (Regulation 18) Consultation for the DPD)

Question 16. Do you have any comments on the Sustainability Appraisal (SA)?
While we have utilised the Interim Sustainability Appraisal Report (September 2024) to inform our response, we do not have specific comments to make on this document at this time. (Continue on a separate sheet /expand box if necessary)

Section 4: Southbourne Allocation Development Plan Document (Viability Assessment)

Question 17. Do you have any comments on the Viability Assessment?
Natural England does not typically make comments in relation to the viability of development and therefore have no comments to make on this assessment. (Continue on a separate sheet /expand box if necessary)