

Planning Policy Team  
Chichester District Council



12 December 2024

## **SENT BY EMAIL**

Dear Sir/Madam

### **Subject: Southbourne Allocation Development Plan Document (DPD) – Regulation 18 Consultation**

Thank you for consulting the South Downs National Park Authority (SDNPA) on the Regulation 18 Southbourne Allocation Development Plan Document. The **National Parks & Access to the Countryside Act 1949**, as amended by Section 245 of the Levelling Up & Regeneration Act (LURA) 2023, requires all relevant bodies – including Chichester District Council (CDC) – to seek to further the purposes of the South Downs National Park (SDNP). The National Park purposes are:

- 1) To conserve and enhance the natural beauty, wildlife, and cultural heritage of the area; and
- 2) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

#### **Duty to Cooperate (DtC)**

We support Chichester District Council's continuing liaison with neighbouring authorities, including the SDNPA, to ensure that cross-boundary strategic priorities are fully addressed. We would like to take this opportunity to highlight the SDNPA's strategic cross-boundary priorities as a framework for future discussions. These are:

- Conserving and enhancing the **natural beauty, wildlife and cultural heritage** of the National Park and its setting
- **Biodiversity restoration** at all scales and making nature bigger, better and more joined up
- Protection and mitigation of impacts on European designated nature sites including **water and nutrient neutrality**
- Mitigation and adaptation to **climate change**, including nature based solutions
- **Sustainable travel** into, within and across the National Park
- The **local economy** and jobs particularly in land management and the visitor economy
- New **homes** including accommodation for Travellers, focusing on affordable homes for local communities
- Green and grey **infrastructure** serving communities in and around the National Park

We can confirm that we are committed to continued liaison and joint working towards achieving effective outcomes. We have previously commented on the iterations of the Chichester District Local Plan which includes Policy A13 which identified Southbourne as a 'Broad Location for Development', and is currently at Examination. Our comments on the Regulation 18 Southbourne Allocation Development Plan Document are set out below.

#### **Overall Comments**

#### **National and Local Context**

We note that the content sections do not acknowledge two key matters in regards the South Downs National Park and we ask that these two matters are reflected.

Firstly, the relationship between the South Downs National Park, this area in the East-West corridor and the Chichester Harbour National Landscape. As raised in our response to the Chichester Local Plan Review 2035 Regulation 19 Consultation, this is a sensitive stretch of land in the coastal plain between the coast, the south coast railway and the A27. This corridor provides the connection, including intervisibility, between the protected landscapes of the South Downs National Park and Chichester Harbour National Landscape, for example views of the channels within the Harbour from the Trundle and Stoke Clump.

Secondly, the National Parks & Access to the Countryside Act 1949, as amended by Section 245 of the Levelling Up & Regeneration Act (LURA) 2023, requires all relevant bodies – including Chichester District Council (CDC) – to seek to further the purposes of the South Downs National Park (SDNP). This duty is important context for CDC in the preparation of this DPD.

### **Vision and Objectives**

Question 1 – Do you agree with the vision and objectives set out?

#### Response:

We welcome and support this objective in the Southbourne DPD. As raised in our response to the Chichester Local Plan Review 2035 Regulation 19 Consultation, this is a sensitive stretch of land in the coastal plain between the coast, the south coast railway and the A27. This corridor provides the connection, including intervisibility, between the protected landscapes of the South Downs National Park and Chichester Harbour National Landscape, for example views of the channels within the Harbour from the Trundle and Stoke Clump. The principles set out in this objective, such as integrating development into the wider landscape setting will be important to address the sensitivity of this location between the two protected landscapes.

Welcome reference to the South Downs National Park in 4.10 as part of the DPD objective on character. However, we advise adding 'and their setting' as set out below in order to appropriately reflect both the paragraph 189 NPPF December 2024 and the S245 Duty; the National Parks & Access to the Countryside Act 1949, as amended by Section 245 of the Levelling Up & Regeneration Act (LURA) 2023, requires all relevant bodies – including Chichester District Council (CDC) – to seek to further the purposes of the South Downs National Park (SDNP).

*'Harmoniously integrating development into the wider landscape setting, protecting and mitigating impact on views and character of the Chichester Harbour National Landscape and South Downs National Park, and their settings. Create a built form that is influenced by and respects the local character and heritage whilst using best practice design principles.'*

### **Scenario 1: Land to the West**

Questions 2 & 3

#### Response:

We support the reference in the 'challenges' section for Scenario 1 to a landscape buffer being required to protect the landscape corridor in the west of the scenario. We are concerned at the significant erosion of the landscape gap identified in the [Chichester District Council Landscape Gap Assessment 2019](#) arising from this scenario, and the subsequent potential impacts on the connection between the SDNP and Chichester Harbour National Landscape and the setting of the National Park. Page 43 of this study advises that:

*'Development in much of this area would be conspicuous and could block valued views. The open character of the landscape provides positive open views between the settlements across open countryside including across the AONB, to the South Downs National Park and to Southbourne church spire. This contributes to the perceived separation of the settlements, their individual identities and rural settings. These views include positive long views across the gap to the hills within the South Downs National Park'.*

It is also noted that the wildlife corridor would be adjacent to the proposed Green Ring. A suitable buffer to the wildlife corridor should be accommodated to ensure that activities which could potentially result in disturbance of habitats and species of the wildlife corridor are avoided, such as recreational activity.

### **Scenario 2: Land to the East**

Questions 5 and 6 – Do you agree with the list of benefits and challenges set out above? Are there other benefits and challenges that you feel should also be included?

#### Response:

It is welcomed that Scenario 2 proposes to not encroach into the landscape corridor to the east of this scenario. This landscape gap is identified in the [Chichester District Council Landscape Gap Assessment 2019](#), which on page 48 it states:

*'Development in much of the northern and southern area of the gap would be conspicuous, particularly from the public right of way crossing the gap, and could block characteristic views. The open character of the landscape provides positive views between the settlements across open countryside including across the AONB and to the SDNP. This contributes to the perceived separation of the settlements and their rural settings'.*

We note that where the scenario meets the A259, there is notable pinch point with the adjacent wildlife corridor. Careful design including suitable buffer to the corridor should be required to ensure that development or other activities (such as recreation) that could result in disturbance of habitats and species of the wildlife corridor are avoided. This should be recognised in the challenges

### **Scenario 3: Mixed Scenario**

Questions 8 and 9 - Do you agree with the list of benefits and challenges set out above? Are there other benefits and challenges that you feel which should also be included?

#### Response:

It is welcomed that this scenario does not encroach into the landscape corridors to the west and east. These landscape gaps are identified in the [Chichester District Council Landscape Gap Assessment 2019](#). The study says the following regarding the west and east gaps respectively:

*'Development in much of this area would be conspicuous and could block valued views. The open character of the landscape provides positive open views between the settlements across open countryside including across the AONB, to the South Downs National Park and to Southbourne church spire. This contributes to the perceived separation of the settlements, their individual identities and rural settings. These views include positive long views across the gap to the hills within the South Downs National Park'.*

And

*'Development in much of the northern and southern area of the gap would be conspicuous, particularly from the public right of way crossing the gap, and could block characteristic views. The open character of the*

*landscape provides positive views between the settlements across open countryside including across the AONB and to the SDNP. This contributes to the perceived separation of the settlements and their rural settings’.*

It is also welcomed that this scenario appears to be relatively lower risk for potential impacts to the wildlife corridors either side of Southbourne.

We would ask that any opportunities for facilitating non-motorised access northwards are considered to support potential opportunities for access and enjoyment of the South Downs National Park.

Thank you for the opportunity to comment on the emerging Southbourne DPD. We wish you well in the progression of this DPD.

Yours faithfully,

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