

**REPRESENTATIONS FROM
NATURAL ENGLAND**



118837 - Southbourne Parish Neighbourhood Plan - Presubmission

1 message

Lister, John (NE) <John.Lister@naturalengland.org.uk>

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To: southbourne.parishcouncil@virgin.net

Cc: info@southbourneparishcouncil.com

Dear Lawrence

Thank you for consulting Natural England on your Neighbourhood Plan. My brief comments are as follows.

The Plan

- We welcome your response to the Chichester Local Plan in respect of housing numbers, recreational disturbance and recognition of the importance of the AONB – notably in Objectives 1 and 2.
- The statement in para 4.11 justifies the allocations insofar as they accord with saved Local Plan policy RE7, whereby “the planning authority will refuse permission for development which would be likely to damage, destroy or adversely affect ... declared special protection areas”. Reference to the “Interim Policy Statement on Development and Disturbance of Birds in Special Protection Areas and identified Compensatory Habitats (Effective April 2014)” would provide some guidance on how development proposals will be considered in the period up to adoption of a new Local Plan.
- Policy 2 should include reference to the recommendations set out in the SEA, in respect of the allocated sites.
- Much of the land allocated in your Plan is the Best and Most Versatile Agricultural Land – NPPF Para 112 indicates that “Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality”. It would be helpful to know whether options for sustainable development on less valuable land have been considered and dismissed.
- We welcome the commitment to protecting and enhancing the natural environment and the provision of new habitats and green spaces (in Policy 7). These measures should be informed by a clear understanding of the network of habitats in the area and of local landscape character.
- The proposals for Bourne Community College seem to extend into the countryside and some of the best and most versatile agricultural land. Whilst this location may integrate with the green ring, it may stand in the way of, or be cut off by, any proposals for a new north/south road to the west of the settlement.

SEA

- The SEA notes that in most cases “Ecological surveys and assessment will be required to establish which (if any) protected species may be using the site and to design a suitable mitigation strategy”. This is welcomed, however given the proximity of the European sites, these surveys should also consider the extent to which potential allocations are likely to be used by species for which Chichester and Langstone Harbour was designated, and whether the allocations are (in effect) functionally linked land. The survey work outlined above should be done before the land allocations are confirmed, to ensure that any constraints on development are recognised, that the viability and scale of development are confirmed and that the plan is sound in respect of meeting housing needs. There may be sufficient data in biological records to increase confidence on these matters.

Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished reviewing and commenting on your Plan. Nevertheless, I hope you find these comments helpful.

If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please give me a call.

If you wish to comment on the service provided by Natural England please use the appended form.

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Yours sincerely,

John Lister

Lead Adviser

Development Plans Network

Natural England

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