

**REPRESENTATIONS FROM
SUSSEX WILDLIFE TRUST**

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Parish Clerk
Southbourne Parish Council

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By email only to ...
info@southbourneparishcouncil.com

5 June 2014

Dear Sirs,

Southbourne Parish Council Neighbourhood Plan 2014-2029

We are pleased to have the opportunity to respond to the consultation on the **Southbourne Parish Council Neighbourhood Plan 2014-2029 Pre-Submission Plan** (published April 2014).

In preparing this submission we have examined the Pre-Submission Plan and supporting documents, in particular the Draft Site Assessments Report and the Strategic Environmental Assessment (SEA) Environmental Report, prepared by Urban Edge Environmental Consulting.

The principle objective of Sussex Wildlife Trust is to safeguard and enhance the wildlife assets of Sussex and to ensure that people living, working and visiting Sussex can enjoy nature. We support the principles of sustainable development as set out in *Securing the Future*. We are therefore pleased to see that the broad principles of sustainable development have been used to shape the Southbourne Parish Council Neighbourhood Plan (SDNP) and have been integrated into the SEA.

We also support the objective set out in the 2011 Natural Environment White Paper and further elaborated in the National Planning Policy Framework to move from 'no net loss of biodiversity' to achieving a net gain to nature from development. In this context, we have the following observations on the SPNP:

- We are pleased to see that the Community Views included strong support for nature conservation, and recognition in particular of the international significance of wildlife in the area, and that this has been incorporated into the SPNP Objectives & Measures (Section 3.2).
- We support inclusion of Land Use Policies 3 (The Green Ring) and 7 (Environment), and the integration of these policies into Policy 2 (Housing Site Allocation).
- We are pleased to see the comprehensive list of measures to support biodiversity included in the Implementation section (Proposal 2: Infrastructure Projects).
- We strongly support the consideration afforded throughout the SPNP to the need to avoid likely significant effects on the integrity of the Chichester and Langstone Harbours SPA.

Taking Care of Sussex

President: David Streeter MBE
Chairman: Chris Warne
Chief Executive: Tony Whitbread

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We have the following recommendations which we believe would improve the SPNP in terms of safeguarding and enhancing wildlife and the natural environment:

- The Plan covers the safeguarding existing wildlife assets, but there is scope to extend this to deal with enhancement of these assets. In developing the Plan, we would recommend that the 'natural capital' of the area (including biodiversity) is mapped, and that 'ecosystem services' derived from this capital should be assessed. This links to several elements listed in the Infrastructure Projects section.
- Biodiversity safeguarding and enhancement should be defined as core content of any masterplanning tasks for specific housing developments, and should be considered in relation to objectives for Sussex Biodiversity Opportunity Areas in and around the SPNP area.
- We are pleased to see in the Draft Site Assessment Report that potentially important wildlife assets are recognised and work to improve baseline ecological information is specified. This process could be greatly assisted by implementing a simple project to map the biodiversity assets of the SPNP area.
- We note the references to a desire to solve local flooding problems. We would hope that SUDS and consideration of upstream solutions will form part of the considerations as this aspect of the Plan is developed.
- We note that in all 14 potential development sites assessed there is a generic reference to the effect "*if developed, mitigation may be required to off-set any disturbance to birds in the Harbour Area caused by additional residents' activities*". We are concerned that this is likely, in our view, not to be compliant with the requirements of the EU Habitats Directive, as implemented through the Habitats Regulations. Development should not be approved unless a conclusion of 'no likely significant effect' on the integrity of a Natura 2000 site can be concluded. We would recommend that more work is done on this aspect of the Plan.

We will be pleased to provide further input to the SPNP as it develops and also further information on any of the points raised in this response.

Yours sincerely

Ian Hepburn
Head of Conservation Policy