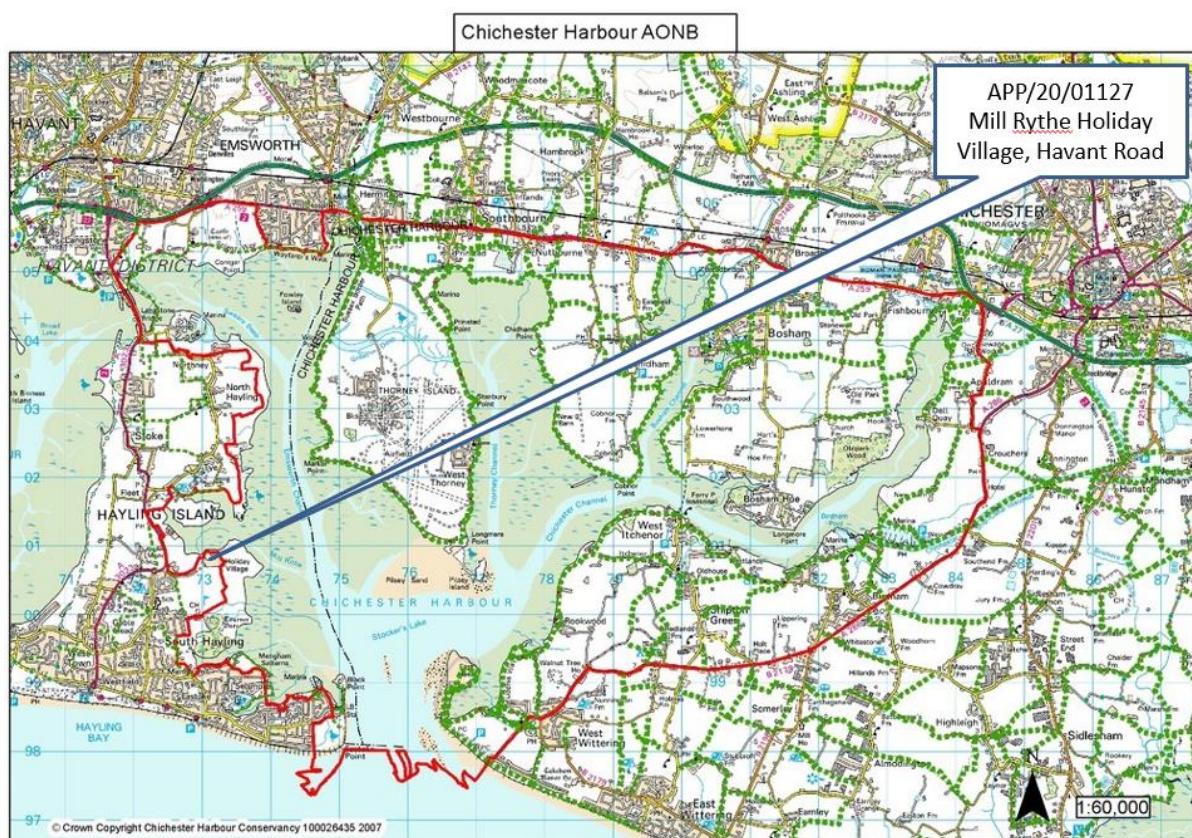


Local Planning Authority planning application reference: **APP/20/01127**

Site: **Mill Rythe Holiday Village, 16 Havant Road, Gable Head, Hayling Island, Hampshire**

Proposals: **Full Application pursuant to APP/16/01237 dated 5 May 2017, for the redevelopment of the holiday site including the demolition of redundant chalets, use of land for the siting of 112 holiday caravans with areas of open recreational space, cease the use of the land for pitch and putt purposes and retain the remaining pitch and putt area as a managed wildlife area including the provision of an ecology bund & ditch, landscaping, the siting of three bird hides with bat roost in their roof spaces and a mown 'circular wildlife walkway'**

Application details on LPA webpage – https://planningpublicaccess.havant.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_249588



RECOMMENDATION

- (a) That Havant Borough Council, as local planning authority be advised that Chichester Harbour Conservancy raises **OBJECTION** to the proposed development.
- (b) That the following planning issues impacting on the AONB are considered to justify an objection to the proposal.

Refusal Overview: The proposal for the increase in holiday units on previously used recreational land would physically increase the developed area of the park resulting in the loss of a significant amount of the amenity area within the site. This would change the character of the eastern part of the site within the countryside area, creating a clearly tourism form of development in appearance which is an unwelcomed intensification of the

activities with this countryside location and likely to increase activity beyond the boundary within the AONB with associated wild life disturbance on the fringe of the adjacent and visually important AONB protected landscape (contrary to 'AONB Planning Principle PP01: Chichester Harbour as a Protected Area' of the adopted Chichester Harbour Management Plan - April 2019).

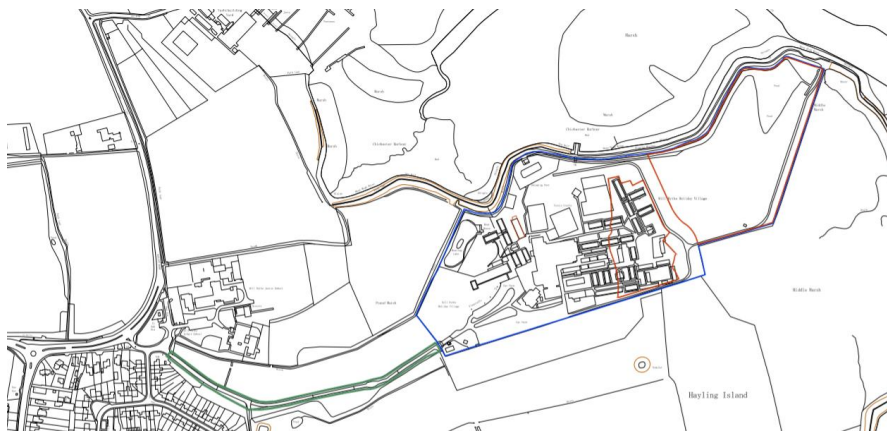
- Lack of land use justification in close proximity to the AONB protected landscape
- Prominent impact to the AONB protected landscape
- Recreational wildlife disturbance within the AONB protected landscape
- Waste water sewerage systems capacity is not proven
- Nitrogen nutrient increase requiring mitigation measures not provided

Procedural Guidance 1: Planning Approach to the AONB

The statutory purpose of the AONB is to conserve and enhance the area's natural beauty.

The LPA should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (Section 85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that *this duty also applies to proposals outside the designated area but impacting on its natural beauty*.

Chichester Harbour Conservancy, administer and safeguard the Chichester Harbour Area of Outstanding Natural Beauty (AONB). The aim of conserving and enhancing the areas natural beauty requires the Conservancy to consider the proposal on its landscape character aspects and wildlife, ecology and biodiversity implications. Landscape covers both countryside and coastal areas as well as rural villages and market town urban environments.



Conservancy Officers' comments and reasoned justification

1.0 Site and its context

Contextual Consideration –

- 1.1 The application site is located *outside* but adjacent to the Chichester Harbour Conservancy Area of Outstanding Natural Beauty (AONB), where development is subject to more stringent planning guidance to ensure that development respects and enhances the inherent qualities of such a sensitive location.
- 1.2 Other setting contextual considerations –
- The red-line application site has a boundary with a coastal frontage.
 - The site is not within a Conservation Area.
 - The site is not indicated to be on or close to a building on the scheduled list of buildings of historic or architectural importance.
 - The site is indicated as being within Flood Zone 3, although a sea wall protects the site.

Location and Existing Development –

- 1.3 The planning unit is the holiday village. This is located *outside* the AONB to the end of a long unnamed access road to the east of Havant Road (A3023) at Gable Head. The 13.14 ha (32.46 acre) site occupies a countryside location with a coastal boundary to the Harbour.
- 1.4 The planning unit is formed of various holiday unit lets. These are mainly static caravans but have included single-storey and two-storey built chalets structures. There is also a central building and outdoor recreational and social areas which form the 'village centre'. The holiday units are linked by circulation roads and footpaths with pockets of amenity and landscaped areas.



2.0 Relevant planning history

- 2.1 **APP/16/01237** – Proposal for the use of land for siting of 203 holiday caravans including 5 caravans for use as staff accommodation following the demolition of 6,111-sqm of redundant chalets and facilities buildings, refurbishment of retained single and two storey holiday chalets to form 87 units of holiday accommodation, retain managers bungalow, sales area for 5 caravans, refurbishment of remainder of central facilities building, CCTV cameras, provision of new pedestrian concourse with terraces, splash and dry play areas, multi-games court, adventure golf course and outdoor theatre and new landscaping. Retaining existing pitch and putt golf course to the east of the site. Comments of CHC raised objection to the proposal. The LPA APPROVED the proposal on 5 May 2017 for holiday purposes only (planning condition 3), limiting the holiday accommodation to 87 chalets and 203 caravans (planning condition 4). Details were to be provided for external lighting (planning condition 7), and foul and surface water drainage (planning condition 14).

The red-line site covered the whole 13.14-ha site (developed area 10.49-ha and grassland/scrub 2.65-ha) and provided a total of **290 holiday units** (87 self-catered chalets and 203 static caravans). Various discharge of planning condition submissions are recorded on the web page.



- 2.2 **APP/11/01080** – Proposal for Change of Use of part of the land for the siting of 31 static caravans. There is no record of a comment from CHC on the LPA public access web site. On 7 June 2013 the LPA APPROVED the proposal for a duration of 25 years (planning condition 2), for holiday purposes only (planning condition 12), and for no more than 10 months duration in any calendar year and not during January and February (planning condition 13). Details were to be provided for surface water drainage (planning condition 5), and external lighting (planning condition 6). The red-line site was an area of 0.80 ha located to the north central part of the site. Various discharge of planning condition submissions are recorded on the web page.

3.0 Proposed development and Supporting Documents

- 3.1 The current proposal seeks a total of 309 static caravan holiday units across the 13.14 ha holiday village site. The previous permission indicated that the site provided 290 holiday lets in a mix of caravans and chalets. Therefore, there is an overall increase from these figures of 19 holiday unit lets across the whole site.
- 3.2 The current proposal indicates three separate red-line site areas within the holiday village planning unit. The three red-line site areas cover 5.73 ha of the total site area. The three areas comprise of the demolition of a chalet building (western part of the site), an additional 54 caravans following chalet building demolitions (central area of the site), and additional 58 caravans to the recreational area (eastern part of the site).
- 3.3 The proposal makes provision for 112 new caravans to replace 86 chalet holiday units which are to be demolished (one is to be retained). This results in an overall increase of 25 caravan holiday units, but this includes the loss of caravans (or absence of provision from the earlier permissions) as part of site layout changes.
- 3.4 The western and the central areas denoted as part of the red-line site currently lie within the developed area of the holiday village. The eastern area red-line site is currently occupying an area laid to grassland and scrub and is used for open recreational space.
- 3.5 The eastern red-line site open recreational area is partly used as a pitch-and-putt course which would be lost as part of the proposals. This area would partly be used for some of the 58 new caravans to this area and part to form a managed wildlife area including the provision of an ecology bund & ditch, landscaping, the siting of three bird hides with bat roost in their roof spaces and a mown circular wildlife walkway.
- 3.6 Submitted in support of the application documents (forms, plans and drawings) and relevant to the AONB consideration are a Planning Statement, Landscape and Visual Impact Assessment, Flood Risk Assessment, Arbicultural Impact Assessment, Ecological Appraisal, Ecological Mitigation Strategy, European Site Avoidance and Mitigation Checklist, Bat Survey, Reptile Survey, and Nitrogen Budget Calculator.

4.0 Applicants Approach to AONB

- 4.1 The site lies *outside* but directly adjacent to the boundary of the Area of Outstanding Natural Beauty (AONB). The submission has made little if any consideration of the application proposal within the context and setting of the AONB.

5.0 AONB Planning Considerations

- 5.1 The statutory purpose of the AONB is to conserve and enhance the area's natural beauty (see procedural guidance note 2 above). The overarching principle, PP01 (appendix A para. A.6) is applicable to the proposal. Any development in, or affecting the setting of, the AONB should be guided by the four principles as indicated in Section 2 of the Chichester Harbour AONB Joint SPD (2017) in order to protect, conserve and enhance natural beauty and wildlife.
- 5.2 The principle of the development to the AONB protected landscape needs to be considered. The AONB Planning Principles (see Appendix A paras. A.6 to A.9) are applicable to the AONB protected landscape and development that impacts upon the protected landscape. The **adopted guidance** requires a **clear demonstration that**

no harm is caused to the AONB protected landscape from or by this proposal.

- 5.3 The consideration would require a full and detailed assessment of the potential, possible, and probable impact to the character and appearance of the site and locality of the AONB protected landscape. The main AONB protected landscape Planning Principle policy assessment issues to be considered for this site relate to –

1. The principle of the use and activity of the development to the AONB locality
2. The proposed physical works, scale, massing and bulk on the AONB landscape
3. The building design, character, appearance and finished treatment to the AONB
4. The layout design and visual character and impact of the site to the AONB
5. The impact on the tranquility and natural environment to the AONB
6. The wildlife, biodiversity and environmental effects within the AONB
7. Any measures to mitigate the impact of ecological and environmental disturbance
8. AONB Planning Principle policy considerations

1. Principle of the use and activity to the AONB protected landscape

- 5.4 The principle of the proposed use and activity has to be considered alongside its relationship to the land which surrounds it. It is considered to be contrary to the protection of the countryside for its own sake. However, the whole site forms the planning unit for the holiday village and has planning permission for the use for tourism purposes. The current three red-line application parts are within the holiday village planning unit. Therefore there is no change of use being considered, only the siting location of the additional static caravan holiday unit lets.
- 5.5 The proposal seeks an additional 112 static caravans holiday units to replace 87 chalet units. The total holiday units across the site would be 309 compared to 290 as currently permitted by earlier consents. An overall increase of 19 units.
- 5.6 More than half of the additional static caravans, 58 caravans, would be sited outside the existing developed part of the site and would extend out into the existing open recreational and grassland amenity area of the site to the east. This is within the holiday village planning unit.
- 5.7 The use and activity has the potential for retaining tourism activity within the site itself, particularly with the facilities within the 'village centre' area. In this way the tourism activity would not be decanted to surrounding areas of the coast.
- 5.8 Tourism development can be catered for outside of the AONB, and beyond the surrounding countryside buffer area that supports and provides a setting to the designated AONB protected landscape. That would be the preferred option, however, the site is an existing tourism focus with planning permission.
- 5.9 Given the expansion of holiday units, rising from 290 to 309 static caravans overall, the additional 19 caravans may appear a small increase overall. However, the physical expansion from the developed area of the holiday village into the open recreational area of the holiday village is a more significant outcome.
- 5.10 The case against the proposal is the undeniable impact the resulting expansion of the use and activity would have on the open recreational areas outside but adjoining and within the supporting areas to the AONB protected landscape.

2. Physical works, scale, massing and bulk on the AONB landscape

- 5.11 The principle of the proposed physical works, scale and massing / bulk would be a significant change from the existing open countryside nature of the eastern area within the planning unit and the immediate adjacent surrounds and setting. The development would have 58 static caravan being located and sited beyond the current development area of the site, reducing the open recreational grassland area.
- 5.12 The proposal would not be viewed from the public highway due to distance from Havant Road (A3023). Views would be available from the coastal area however. The physical work would be an incursion into the open recreational space of the holiday village. Whilst this is significant it would be with a backdrop of the existing development area of the holiday village, and may therefore be less dramatic than if it were a new separate, detached caravan site. The proposal would still maintain a noticeable visual appearance to the area.

3. Structure design, character, appearance and finished treatment to the AONB

- 5.13 The design and finished treatment of the proposal relate to static holiday caravan units which currently populate the development area of the holiday village site. Caravans are not noted for their design quality or sympathetic appearance within countryside areas. The factors which need to be considered are the visual character given the backdrop of the existing holiday village, and the visual significance of being open to public viewpoints.
- 5.14 There are little details relating to the appearance of the caravans themselves. The loss of the single and two-story chalet block building would have a noticeable and beneficial impact on the appearance of the site and the surrounding area.

4. Layout design and visual character and impact of the site to the AONB

- 5.15 The principle of the proposed layout of the site in design functionality, setting character, and estate appearance on the adjacent AONB protected landscape and within the supporting landscape environment would be noticeable. However it would only be the additional land-take to the eastern part of the planning unit holiday village where the additional spread of static caravans would be mostly noticed.
- 5.16 The layout arrangement within the holiday village development area is accepted as having little impact outside of the site. The additional spread of the caravan layout into the open recreational area is more pronounced and significant to the AONB character.

5. Tranquility and natural environment qualities in the AONB

- 5.17 The use and activity and the visual physical structures impact on the holiday village planning unit site and the wider surroundings. When considering this against the character and tranquility of the nearby AONB protected landscape the current situation will have a substantial influence.
- 5.18 The potential noise impact resulting from the proposed development and activity would have to be considered against the noise impacts from the existing holiday village use. The usual noise profile of tourism site development is unlikely to be a significant issue in terms of any likely additional noise implications to the adjacent AONB protected landscape.

6. Wildlife, Biodiversity and environmental affects within the AONB

- 5.19 It is understood from caselaw that a local planning authority must not determine an application until the absence of protected species from the site or a method statement where presence is established has been undertaken.
- 5.20 The development will result in a small increase in the level of human activity within the site and areas surrounding the site from the additional 19 static caravan units. This is unlikely to result in any significant increased disturbance of wildlife.
- 5.21 The current proposal comes with an Ecological Mitigation Strategy (EMS - Nov 2020). This recommends a Landscape and Ecological Management Plan (LEMP). The LEMP should provide detailed plans for the ongoing management of the grassland, scrub and open water of the site.
- 5.22 The proposal refers to both a surface water and a separate foul water drainage scheme for the site, plans are provided in the flood risk and drainage appendix. The design of the surface water systems to accommodate the current proposals are stated as being in accordance with current national and local policies on SuDS (*submitted drainage strategy page-28 para 8.6 and 10.5*). The foul water system is indicated use the existing terminal / main foul water pumping station via the new satellite pumping station (*submitted drainage strategy page-35 para 9.1 and 10.9*).
- 5.23 Due to the uncertainty that the proposal can be accommodated by existing wastewater treatment infrastructure without causing harm to coastal designated sites, Natural England guidance is that all new development proposals should achieve nitrogen neutrality. The nutrient balancing assessment submitted indicates that the proposal would result in an increase in the Total Nitrate (TN) discharge of 36.4 kg/year (*submitted nitrogen budget calculator*). This increase will necessitate a mitigation strategy to be provided for the proposal. The application indicates that an avoidance and mitigation package in line with the Council's Nutrient Neutrality Mitigation Plan will be included (*submitted European Site Avoidance and Mitigation Checklist page 2*).

7. Measures to mitigate the impact of ecological and environmental disturbance

- 5.24 The EMS includes a 'managed wildlife area', an 'ecology bund with adjacent ditch' and three hides overlooking the small lake on the north-east edge of the site. Allowing space for wildlife to thrive on the site is welcomed, but it is unclear what species will benefit. This requires important detail to be added through the LEMP, for instance, how the 'ecology ditch' will remain wet is unclear, as it appears disconnected to nearby water sources.
- 5.25 A number of other enhancements should also be implemented, such as the provision for breeding shelducks (e.g. via nest boxes in the proposed bund), suitably sited reptile refugia, a tern nesting raft on the lake, and a mowing/cutting regime to ensure a variety of sward heights and structural diversity are maintained in the grassland, hedgerows and scrub areas. Any planting should be limited to native species, from native stock.
- 5.26 The current open space to the east of the development area is designated as Site of Importance for Nature Conservation (SINC) and the proposed development of the holiday village holiday unit layout is likely to impact the site.
- 5.27 The schedule for the SINC notes the presence of spiny retharrow *Ononis spinosa*. A

survey for spiny retharrow and other scarce plants, to be carried out in the appropriate season, is recommended so that future management of the site can be tailored to ensure its presence, and written into the LEMP. It is notable that the EMS has no chapter on the botanical interest of the site.

- 5.28 It is noted that the EMS states that further bird surveys will be undertaken during winter 2020-21. This is also when the demolition of part of the site had already commenced and therefore these works, given the noise and activity, are likely to influence the results of the surveys.

8. AONB Planning Principle policy considerations applicable to the proposal

- 5.29 The site is adjacent to, but *outside* the AONB protected landscape. The AONB Planning Principles, and the Joint Chichester Harbour AONB SPD policy considerations only apply within the AONB.
- 5.30 The Chichester Harbour Management Plan however is linked to the Chichester District Local Plan Policy-43, and therefore in terms of the AONB's setting Policy-1 Conserving and Enhancing the Landscape, Policy-2 Development Management, and Policy-3 Diversity of Habitats, are relevant.
- 5.31 The AONB Planning Principles (see Appendix A paras. A.6 to A.9) are applicable to the AONB and development that impacts upon the protected landscape. The proposal can be seen to compromise the aspects of the AONB planning approach.
- 5.32 AONB Planning Principle PP08 New Tourist Accommodation includes four criteria for consideration for development within the AONB protected landscape.
- i) visual intrusion: the static caravans are low-level tourism units but in substantial numbers the small scale individual units create a caravan estate. This is intrusive and within the holiday village planning unit require to be screened by both distance and landscaping or intervening buildings and structures from main public vantage points,
 - ii) noise: there would be an increase in noise associated with the use and occupation and travelling to and from the additional caravans in the new locations, however this would be through the existing holiday village and therefore would be difficult to separate from the existing noise profile of the planning unit as a whole.
 - iii) increased recreational activity: the increase in tourism activity is small (overall an additional 19 holiday unit lets). The activity would primarily be within the holiday village complex, however some external tourism visits are likely to take place. The associated movement to and from the site to venues in the local and wider area, would be limited compared to the scale of the existing holiday village. -
 - iv) erosion of rural character: the additional spread of the holiday unit lets into the open recreational area to the east of the holiday village planning unit would visually impair the appearance and character of the openness and natural character and appearance of the locality. Whilst the open land is part of the planning unit for tourism activity, the holiday unit lets in this location would be a stepped erosion of the rural character of the area.
- 5.33 AONB PP09 is applicable to proposals within a countryside, coastal or semi-rural location where light illumination would have a wider impact and influence than only

to the site and immediate surrounds, and could create a visual impact to the AONB protected landscape setting.

- 5.34 The lighting specifications of the proposal have not been provided as part of the submission. It is however reasonable to assume that there would be lighting provided to the new internal road network within the holiday village site, to individual static caravan holiday unit lets. Lighting is also likely to the car parking areas. Vehicles visiting the eastern areas of the holiday village site would also have side lights, head lights and possibly other light displays available when entering, leaving or being viewed on the red-line site during late evening or early morning hours.

Conclusion

1. The site lies close to the AONB protected landscape and within the supporting wider environment. The development area of the red-line site lies outside of a settlement policy area and therefore within the countryside.
2. The proposal would increase tourist accommodation development in the area. On this basis, the proposal should be considered against the published policy requirements for such development.
3. The proposal can be seen to compromise the aspects of the Chichester Harbour AONB protected landscape designation planning approach to a UK National Landscape area.

CHC Planning Committee Process

DR - prepared for 15.02.2021 CHC Planning Committee (meeting via internet)
Assessment 01-02-2020 LPA request reply 12 February 2021 LPA extension of time has been agreed
LPA Planning Case Officer: Lewis Oliver – Planning Officer
Chichester Harbour AONB: David Rothery – Principal Planner and Peter Hughes – AONB Ecologist

This recommendation is made having regard to the Policy framework:

- Chichester Harbour **Landscape Character Assessment** (CBA update 2019)
- Chichester Harbour **AONB Management Plan** (2019-2024)
- Chichester Harbour **AONB Planning Principles** (Management Plan version April 2019)
- Chichester Harbour **AONB Joint Supplementary Planning Document SPD** (2017)
- National Planning Policy Framework (July 2018)
- National Planning Practice Guidance (March 2014)
- Havant Borough Local Plan (2011/2014)

Visit our webpage – www.conservancy.co.uk/page/planning
Chichester Harbour Conservancy manage and advise on the
Chichester Harbour Area of Outstanding Natural Beauty
One of the UK's National Landscapes

ASSESSMENT REPORT APPENDIX A : POLICY FRAMEWORK

A Chichester Harbour Policy Guidance

The adopted guidance requires a clear demonstration that no harm is caused to the AONB.

- Landscape Character Assessment (LCA)

- A.1 The Chichester Harbour AONB Landscape Character Assessment (CBA update 2019) prepared for the Conservancy, provides an understanding of the unique landscape character and special qualities of the Chichester Harbour Area of Outstanding Natural Beauty (AONB) to inform the development of AONB Management Plans and wider planning policy.
- A.2 The LCA identifies the site sits alongside (and therefore sharing the common landscape character of the adjacent AONB landscape) the *Zone H1 - Havant to Chichester Coastal Plain* Landscape Character Area type.
[https://www.conservancy.co.uk/assets/files/cms_item/613/d-Landscape_Character_Assessment_\(2019\)-b4BJ98ZSz0.pdf](https://www.conservancy.co.uk/assets/files/cms_item/613/d-Landscape_Character_Assessment_(2019)-b4BJ98ZSz0.pdf)

- Management Plan

- A.3 The Chichester Harbour Management Plan 2019-2024 (April 2019 Third Review) provides an integrated coastal zone management strategy for the Trust Port and Area of Outstanding Natural Beauty. Relevant policies would include Policy 1: Conserving and Enhancing the landscape, Policy 2: Development Management, and Policy 3: Diversity of Habitats), Policy 8 (Thriving Wildlife), and Policy 15 (Historic Environment and Heritage Assets).
- A.4 The Conservancy's Management Plan for the AONB records special qualities of the landscape character, which includes unspoilt and unobtrusive beauty, and a special sense of peace and tranquillity. The Plan also set down the vision and values for the AONB, which specifies the special qualities of the AONB, and the diverse habitats and excellent water quality that benefit a rich array of wildlife using the Harbour in harmony with recreational activities.

- Planning Principles

- A.5 The Chichester Harbour AONB Planning Principles (Management Plan version April 2019) provides guidance on development. These principles set a range of criteria to be addressed to warrant a favourable consideration in terms of likely impact within and on the AONB. Planning Principles' applicable to this proposal include.
- A.6 AONB Planning Principle **PP01: Chichester Harbour as a Protected Area**, sets out the key overarching approach for the AONB, in that the statutory primary purpose is to conserve and enhance the natural beauty of the area. Great weight shall be given to the protection of the landscape, the conservation of nature, and the special qualities of Chichester Harbour and its surrounding supporting hinterland.
- A.7 AONB Planning Principle **PP08: New Tourist Accommodation**, covers tourist caravan siting. This states that the Conservancy is likely to object to applications for new or extended caravan or tourism accommodation sites within the AONB. The Conservancy will consider this approach unless the development can be demonstrated that there would be no harm from visual intrusion, noise, increased recreational activity or erosion of rural character.
- A.8 AONB Planning Principle **PP09: Dark Skies**, that are adjacent to or impact on areas of nature conservation will only be supported in exceptional circumstances. Lighting should be demonstrated to be –
- the minimum needed for security and working purposes,
 - obtrusive light from glare or light trespass is reduced to an acceptable level,
 - light beams will not be pointed out of windows,
 - security lights are fitted with passive infra-red detectors (PIR) and/or timing devices to minimise nuisance
 - comply with the published best practice guidance from the Institute of Lighting Professionals

- **Joint Supplementary Planning Document (SPD)**

- A.9 The Chichester Harbour Area of Outstanding Beauty Joint Supplementary Planning Document (2017) indicates four principles that any development proposed in the AONB should be guided by to protect, conserve, and enhance natural beauty and wildlife (Section 2). The SPD provides detailed guidance on the level of acceptable development within the AONB. All development within the AONB should follow the guidance as closely as possible. It is adopted by both Chichester District Council and by Havant Borough Council as part of their planning policy and development control approach.
- A.01 The adopted SPD section-8 (page 17) requires that in designing new development, consideration of the setting of the development in the AONB landscape must be shown as to how the proposal would contribute to the character of the area. A Landscape Visual Impact Assessment may be necessary in sensitive areas of exposed wide landscape character.

- **Other Policy**

- A.11 The LPA have an adopted Local Plan which is made up of the Core Strategy 2011 and the site Allocation Plan 2014. These policy documents will remain in place until the Havant Local Plan 2036 has completed its adoption process. There are many relevant policies for the LPA to consider against planning application submissions. Particular ones within the AONB include Strategic Core Strategy Policies - CS12: Chichester Harbour Area of Outstanding Natural Beauty (AONB), CS16: High Quality Design; and Development Management Policies - DM8: Conservation, Protection and Enhancement of Existing Natural Features, DM9: Development in the Coastal Zone, amongst others. The Draft Local Plan continued with similar policies including E11: Chichester Harbour Area of Outstanding Natural Beauty, E6: High Quality Design, and E15: Ecological Conservation, E18: Protected Species, amongst others.