

**DRAFT SELSEY NEIGHBOURHOOD PLAN 2017**

**PRESUBMISSION CONSULTATION**

**THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 REGULATION 14**

In order for your representation to be taken into account your contact details are needed. All comments will be publicly available, and identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed by Selsey Town Council in line with the Data Protection Act 1998.

**NAME Paul Henry**

**CONTACT DETAILS**

3 [REDACTED]

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**Comments:**

Overall I think the Council has produced a good plan and it is well presented. I do think, however, that there should be some changes and improvements.

I do not comment below on everything that I think is good and to be supported but concentrate on the most significant items.

From what is said in the Foreword, it seems that the Policies in part 1, though to be read in conjunction with part 2, do have the greater weight in the Plan. Thus some need changing or strengthening. My detailed comments and suggestions are as follows.

**1) PART 1 Page 3.**

Although the 2<sup>nd</sup> para rightly highlights the importance of renewable energy and reducing the carbon footprint, this is not included in Policy 001. I strongly submit that it should be included, perhaps even including all the points 1-5 of page 29 of Section 2, which are exactly the things that the council and any builders should be doing.

Insisting on buildings having energy- efficiency built in (and not retro-fitted) through wall, floor and roof insulation, solar and heat sink sources etc is as important as ensuring they minimise the impact of flooding.

Assuming the Council agrees as it seems to from elsewhere in the Plan sections, it should be included as part of Policy 001.

The "Town Council's Policy on renewable energy" is mentioned on Section 2 Page 13, but it is not clear to me whether this means the Council already has one (in which case why can't I find it available on the Council's website?) or it is actually the statements on Page 14 of Section 2. If it is the latter I suggest:

- a) those statements should go further, by at least integrating with the points about building design set out in the first two paras above in Comment 1;
- b) make it an explicit Policy in addition to the 13 set out. This might be especially important if the Council really means it when it says in Section 2 Pages 12 -14 that Selsey could and should be at the forefront in developing alternative renewable energy sources and behaviours in energy use, can be a testing ground etc

2) Part 1 Page 3 Policy 001 – Building Height

It is absolutely right for the Council to insist that no building should be more than 3 storeys high, but this should not be watered down elsewhere as it seems it might be by the reference on page 42 of Section 2 to “unless there are exceptional reasons”; this latter clause should be deleted from Section 2 page 42.

3) Part 1 Page 4

I suggest that the excellent point about maintaining Selsey's semi-rural character mentioned in Section 2 Page 34 should also be included as part of the Policy and that, for new design and development and refurbishment of roads and paths, the planting of trees is promoted as policy. But I'd suggest further that, as in some other countries, we plant fruit trees such as apple trees that all the community can benefit from, rather than just ornamental trees.

4) Part 1 Page 11

I suggest that either as part of Policy 007 or an 007b, the Council should state that its policy is to maintain the Village Green status of the Oval Field and not allow any building or infringement of it.

The fact that this is not stated in unequivocal terms leads me to wonder if the proposal to set up “an educational yet entertaining solar and stellar observatory with auditorium” mentioned on Section 2 Page 7 and Section 2 Page 42 will be proposed again to be sited on the Oval Field as it was a while ago. This should not be re-proposed. If the Observatory is to be pursued, and I think it could be good for Selsey, then serious consideration should be given to siting it at either the east end of east Beach car park, where it could be raised on stilts to avoid flooding and get good vision, or on the east end of Lifeboat Green where the temporary Lifeboat shop and building has been placed, which has given no detriment to the field's use. The advantages of either site would be that they would not involve losing any/much precious green recreational space and there is parking close by.

But in the vicinity of Oval Field I would suggest that the Council works with RSPB to provide a Hide for Birdwatchers at the end of Grafton Road, where many birdwatchers congregate in all weathers as a good vantage point. Although a hardy lot, a hide would be welcome I'd think and Selsey should try and capitalise on having so many birdwatchers visit Pagham, Church Norton and Medmerry i.e. get them to feel welcome, stay and spend.

5) Part 1 Page 12

Again I think the Council's policies on Transport especially regarding the roads and cycling route need strengthening.

Regarding the roads, if the Council's views are only in the text and not in an actual Policy i.e. 009 or 009a/b, they are presumably less forceful.

I would suggest it should be a numbered Policy that the Council will use all efforts to get the WSCC and Highways Agency to drop any plans to widen roads or create new ones and instead to concentrate on resurfacing the roads, especially B2145 and A27, and other cross-Manhood roads and create greater safety. The latter could be addressed (apart from cycle routes which I deal with below) by for instance using speed cameras,

particularly in Sidlesham and Selsey's main roads to actively discourage speeding and dangerous driving.

Any money used to widen the B2145 or A27 for cars would be wasted and counterproductive, as drivers would speed more and risk more. The Council and others should do as is said elsewhere in the Plan and discourage use of cars.

The traffic flow from Selsey into Chichester is not that bad and the only real hold-ups are when there are cycles or farm vehicles backing up traffic. Buses do not cause a problem and we can all be more patient. Employers and employees could stagger start and finish times at work more to avoid traditional "rush- hours" more, otherwise it is something we should just continue to put up with if we use our cars. (Note: the same applies to the A27, a bit of delay is part of what you get for travelling at peak times; the M25 and other roads show the folly of just adding more width- lanes are not used properly, you get more traffic and no lessening of slow traffic blocks and delays, and as many, if not more, accidents. No more money into new/widened roads, please; let's get good surfaces on the ones we have.)

6) Part 1 Page 12 Policy 009

It is good to see that the Council will support a cycle route. I suggest that it is time to make this a priority to pursue with WSCC and Highways Agency.

I suggest that also in this Policy should be the commitment that any new pathways are joint pedestrian- and cycle-paths. It is mentioned briefly elsewhere, e.g. Section 2 Page 42 under Design and Planning Guidance, but should be a Policy.

People already want to commute to Chichester and more might if they could have a direct safe route. The Bill way is too out-of-the-way for commuting and even those wanting to use it need a safe approach along the B2145 to get to Pagham RSPB site (I have nearly been knocked off at least 3 times).

I suggest more on the Cycle Route proposal and the suggested route should be available on the Council's web-site. It is disappointing that it is not there but available only via the Selsey Information Exchange Community Forum web-site, which does not say, what the current progress is, other than the route proposal developed with Sustrans has been put to WSCC. I suggest the Council should push this issue now.

But also it would be easy for WSCC to reject if it only has one option. I suggest a second option could be developed quickly in the form of creating a cycle lane alongside the north lane of the B2145 using existing footpaths (widened) and board -walks over ditches and obtaining land where there is no other option.

I suspect this would not be too expensive, maybe less than the proposal that has been submitted, and certainly would be better use of public funds than widening the road or creating extra lay-bys. (So I do not agree entirely with the vision regarding roads on Section 2 pages 6 and 17. Resurfacing, yes; widening, no, except for the bike route. And an absolute No to the idea of a flyover on the A27 mentioned on Section 2 Page 16; the visibility of Chichester and the cathedral must not be sacrificed.)

We need more people on bikes and able to walk within and between villages, not more sunk into car use. I say this as a car user as well as cyclist and I fully acknowledge the need for people to drive to work and for other activities out of Selsey- two factors which will not change.

(Despite good bus services people will still use cars. The Council's support of public transport in Section 2 Page 7 and elsewhere is good, buses especially. But I would not want the Council to spend any public money on even a feasibility study of a monorail or replacement tramway mentioned on that page and page 18, because it is highly unlikely the public will change travelling behaviour so massively by 2029 to make such operations more financially viable than buses. The Manhood does not have populations comparable to places where such schemes exist. It's good to be futuristic and challenging in our thinking but let's also be practical and realistic.)

#### 7) Part 1 Page 13

It is right for the Council to push a policy of developing new employment space. In order to achieve Business Development and the vision of Selsey in Section 2 Pages 6 & 7, the Council should consider promoting Selsey as, for example, a place where artists and artisans can have studios and workshops, perhaps using some of the frequently empty High Street premises which may require the Council to promote changes of use. Some flexibility within the general aim of Policies 010 and 011 may be required.

Policy 011 could be strengthened in this sort of way to create more tangible options for businesses.

(Note: I would suggest that getting a large number of working artists in studios and workshop spaces, with a link to display and retail outlets, would be better than what I imagine the concept of a Community Art Centre, listed at Section 2 Page 45, to be. Artists want cheap accessible working accommodation and living accommodation, rather than a "Community Centre". But the two are not mutually exclusive. I focus on the former as it relates to business and vibrancy.)

Other areas of business the Council could perhaps promote are computer-based businesses, diving and similar activities of eco-tourism, sustainable building design and construction such as eco-houses (Selsey has such mixed architecture and lots of new builds, as well as builders and architects. Some might be encouraged to go down a production route for modern eco-friendly housing.) No doubt the Council could come up with many ideas as to what businesses could help achieve the vision but I suggest it needs a policy to work with other agencies to promote Selsey as a place that will give them advantages for siting their businesses here.

#### 8) Part 1 Page 14-15

This is an essential Policy- to protect the High St and East Beach shopping areas. The retail centre which ASDA is developing is not shown on the Policies map on p15, but it is there as a retail centre and its effects on the High Street could run directly counter to the Council's avowed position of protection.

I suggest the Council makes clear that it will oppose any extension of the retail facilities on this new site. Moreover it should add to the restriction regarding the effects on wildlife of any proposed new sites outside the area on arable or open fields the condition that such proposals must be guaranteed not to diminish the High Street or east Beach retail service to Selsey and will be fully opposed by the Council if there is a prospect of a negative effect.

9) Part 1 Pages 11-16

I am surprised there is no mention of Broadband and Mobile connectivity in an actual Policy, either Infrastructure or Economy as the most likely Policies. Broadband is only mentioned briefly on pages 22 and 43 of Section 2.

Section 2 Page 36 notes how many home-workers and businesses there are in Selsey and Section 2 Page 6 talks of Business Development.

For these, as well as for other businesses especially new ones, fast reliable broadband and mobile telephone connections are vital. The Council could not only support the main developers and service providers but could examine a more localised service, perhaps a co-operative. There are some models to examine elsewhere in England.

At the very least the Council should explore whether a mast to improve signals is necessary and whether one could be sited with minimal impact on people and the environment at, say, the Coastguard station or near the Fire station.

10) Aside from these points and suggestions I would support most of what is in Section 2.

Obviously from all I have said I would not support the proposals to have a Supermarket, Petrol Station or Hotel or changing the B2145 other than regarding cycles. None are necessary when we have enough options already, and we do not want to drive existing businesses out (e.g. we have B&Bs and Selsey is ripe for people to do AirBnB so a hotel would have detrimental effect.)

However I would want to emphasise the detailed comments I have made in 1 to 9 above.

I hope they will be useful.

Thank you for the opportunity to comment on the draft NP.

Yours faithfully,

Paul Henry



## Representation Form

### Selsey Neighbourhood Plan

The Neighbourhood Planning (General) Regulations  
2012 - Regulation 16

W [REDACTED] Parish Selsey Town Council has prepared a Neighbourhood Plan. The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

Copies of the W [REDACTED] Selsey Neighbourhood Plan and supporting documents are available to view on the District Council's website: <http://www.chichester.gov.uk/neighbourhoodplan>.

**All comments must be received by 5:00pm on 23 March 2018.**

There are a number of ways to make your comments:

- Complete this form on your computer and email it to: [neighbourhoodplanning@chichester.gov.uk](mailto:neighbourhoodplanning@chichester.gov.uk)
- Print this form and post it to us at: **Neighbourhood Planning, East Pallant House, 1 East Pallant, Chichester PO19 1TY**

**Important Note:** All comments will be publicly available, and identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed by Chichester District Council in line with the Data Protection Act 1998.

#### How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box.

<b>PART A</b>	<b>Your Details</b>
Full Name	Paul Henry
Address	[REDACTED] [REDACTED]
Postcode	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]
Organisation (if applicable)	
Position (if applicable)	
Date	23.3.18

## PART B

To which part of the document does your representation relate?

Paragraph Number Policies section, page 3		Policy Reference:	001
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications  Oppose  Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

**This should include a requirement that all new developments have renewable energy facilities built-in so as to support efforts to alleviate climate change- sustainable development is a cornerstone of national and local plans and should be herein.**

**I made this plea in my submission in 2017.**

Although the 2<sup>nd</sup> para rightly highlights the importance of renewable energy and reducing the carbon footprint, this is not included in Policy 001. I strongly submit that it should be included, perhaps even including all the points 1-5 of page 29 of Section 2, which are exactly the things that the council and any builders should be doing.

Insisting on buildings having energy- efficiency built in (and not retro-fitted) through wall, floor and roof insulation, solar and heat sink sources etc is as important as ensuring they minimise the impact of flooding. Assuming the Council agrees as it seems to from elsewhere in the Plan sections, it should be included as part of Policy 001.

**The comment from the Council on this was:**

Noted as a concern, however this does not form part of the scope of the NBH Plan.

**As far as I can see from reading the National Planning Guidelines there is no such restriction on what of this nature can be included in the Local Plan. Thus the comment not only seems nonsense but a major failing by the Council when it espouses concerns elsewhere on such key issues as sustainable development, renewable energy. If it has a meaningful and deliverable policy on these matters and real commitment it should be an integral key policy in 001.**

**Overall the Policies document is light or silent on many key points that should be included, most of which I included in my 2017 submission (attached again for reference, rather than me reproduce here. I have highlighted in yellow points I'd want to stress again).**

**Whilst I wouldn't expect agreement to all my points, and other respondents would feel the same no doubt it does seem that little has been taken on board to be owned as Council policy. The fact that the Council has responded to many points made by respondents by saying merely "Noted" or "Not part of the scope of NBH Plan" leads one to think it has gone for brevity rather than real committed policies so that the Town and District Councils do not have to enforce too many controlling policies in their adjudication on development proposals.**

**On the other hand the Council has looked into the 2029 future, sometimes encouragingly,**

other times losing track of the requirement to be realistic. An example of the latter is on page 7 of the Annex A document where the Council talks of some national retail chains establishing in Selsey eg Robert Dyas and M&S. This is daft. They are in Chichester, which has over 10 times the population of Selsey. Also Dyas would undermine the local hardware store(s) we already have as locally-run businesses, something the Council says it wants to protect and nourish. This should be changed.

Rather than go through the Annex A document in detail, as it may have little interest for you or effect on what is adopted finally, I'd merely say that with the exception of the above re Policy 001, the Policies are ok, as far as they go.

(Continue on separate sheet if necessary)

**What improvements or modifications would you suggest?**

Please see above and Appendix.

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.

Yours faithfully,  
Paul Henry  
23/3/18