



Representation Form

Southbourne Parish Neighbourhood Plan Review 2019-2037

The Neighbourhood Planning (General) Regulations
2012 - Regulation 16

Southbourne Parish Council has prepared a Neighbourhood Plan Review. 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 Southbourne Parish Neighbourhood Plan Review and supporting documents are available to view on Chichester District Council's website:

<http://www.chichester.gov.uk/neighbourhoodplan>.

All comments must be received by 5:00 pm on 3 June 2021.

There are a number of ways to make your comments:

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

Use of your personal data

All comments in Part B below will be publicly available and identifiable by name and (where applicable) organisation. Please note that any other personal information included in Part A below will be processed by Chichester District Council in line with the principles and rights set out in the General Data Protection Regulation 2016 (GDPR) and the Data Protection Act 2018, which cover such things as why and for how long we use, keep and look after your personal data.

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 to which paragraph your comment relates by completing the appropriate box.

PART A	Your Details
Full Name	Paul White
Address	
Postcode	
Telephone	
Email	

Organisation (if applicable)	
Position (if applicable)	
Date	21.05.21

PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	Policy SB2
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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:

Southbourne Neighbourhood Plan Representations

These representations are submitted in my capacity as a local resident of Nutbourne and a practicing chartered town planner based in Chichester. They should be read in association with the accompanying plan extracts from the Draft Neighbourhood Masterplan (Annex B) and the Plan extracts from the May 2019 Landscape Gap Assessment prepared on behalf of Chichester DC to inform the preparation of its emerging Local Plan. My comments are as follows:

For the Southbourne Neighbourhood Plan to progress, it has to meet the Basic Conditions for plan preparation.

Paragraph 8(2) of Schedule 4B of the Town and Country Planning 1990 Act sets out the basic conditions a Neighbourhood Plan must meet and which an examiner must consider before it can go to referendum. The statutory test is:

- Having regard to national policies and advice, whether it is appropriate for the Neighbourhood Plan to be made
- Having special regard to the desirability of preserving any listed building or its setting or the character or appearance of any Conservation Area
- Contribute to the achievement of sustainable development
- Be in general conformity with the strategic policies of the development plan for the area
- Be compatible with the European Union (EU) and European convention on human rights (ECHR) obligations

Should the Southbourne Parish press on with its draft Neighbourhood Plan Review it runs the risk that the Plan will fail basic condition 1 and 4 at examination.

It would fail condition 1 because it would not have regard to national policy. National policy in the Planning Practice Guidance (PPG) Paragraph: 009 Reference ID: 41-009-20190509 and basic condition 4 above both say a draft neighbourhood plan must be in general conformity with the strategic policies of the development plan in force. In addition the PPG makes clear Neighbourhood plans are not tested against the policies

an emerging local plan. As drafted the Submission Neighbourhood Plan will fail the basic conditions for plan preparation as it has not been prepared in conformity with an adopted Local Plan. The Local Plan Review is still in draft form and has not yet reached submission stage. The Local Development Scheme does not expect adoption before 2023. Neighbourhood Plans are not tested against the policies in an emerging local plan.

It is understandable that the parish wishes to adopt its Neighbourhood Plan to take back control for development in its area, but the housing numbers allocated to it are not yet final. Moving ahead of the Local plan Review process runs the risk that the Neighbourhood Plan would be out of date at such time the draft Local Plan figure is superseded by the recommendations of a Local Plan Inspector.

The draft Local Plan allocations are subject to change and will be tested at Examination in light of the background documents comprising the Local Plan Evidence Base. The Landscape Gap Assessment (May 2019) has been prepared to inform the evidence base for the emerging Chichester Local Plan. It identifies 'gaps' between settlements located along the A259 in the East-West Corridor that should be protected from development to help maintain the identity of individual settlements; and considers the impact of potential development on designated landscapes including the South Downs National Park (SDNP) and the Chichester Harbour Area of Outstanding Natural Beauty (AONB).

Apart from the failure of the plan to meet the basic conditions for its preparation, objections are raised to draft policy SB2 because as presently drawn a significant part of the proposed development area for 1250 dwellings encroaches into the proposed landscape gap between Southbourne and Hambrook (Ref Gap 10) in the Landscape Gap Assessment.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest:

If the proposed gaps in the Gap Assessment are to be respected, development in the SB2 allocation should be redirected to the west and east areas of Southbourne equally adjoining the existing settlement policy boundary of Southbourne. The east extension would extend development in the area beyond the consented areas at Breach Avenue and land north of Cooks Lane shown on the Site Completions and Commitments Plan in the Neighbourhood Plan. The west extension would be on land around the college contained by the proposed Hermitage and Southbourne gap (Gap 9 in the Gap Assessment). A joint west and east shared extension would have sustainability benefits with both areas being close to the existing college and school and other local facilities at Southbourne itself. As drafted a single east extension as proposed in SB2 would run the risk of causing coalescence with Hambrook.

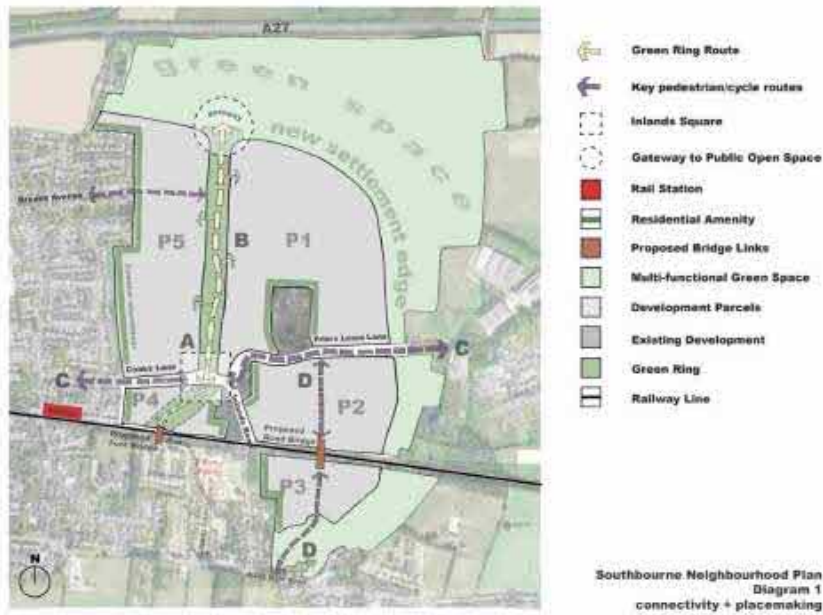
The Plan in the Master Plan Briefing Report (Appendix B of the Neighbourhood Plan) shows a proposed pedestrian crossing and a separate vehicular crossing over the railway line in the SB2 allocation. Both crossings will be costly and without an infrastructure Delivery Plan it is unclear whether they will be deliverable in principle. To minimise delivery uncertainties, all development west and east of Southbourne should therefore be located north of the railway line. The vehicular crossing into land parcel P3 shown on the master plan comprises 5.78ha and has a capacity of 150 dwellings. The cost of the crossing simply to access 150 dwellings is likely to be unviable. There are 3 other road connections at Breach Avenue, Priors Leaze Lane and Cooks Lane. Keeping all development north of the railway line would overcome any need for a fourth crossing onto the A259. Without the vehicular crossing over the railway line, the whole development would be more viable and assist housing delivery in the short term.

The draft allocation SB2 presupposes that the full 1,250 dwellings proposed for Southbourne will be retained in the Local Plan after Examination. This cannot be relied on and might be subject to change, reduce or increase. Therefore another reason to keep all development north of the railway line is that the land north of proposed development areas P1 and P5 on the master plan currently shown as a significant swathe of green space could be used as a land reserve for future development instead if the local plan allocation requires it. This solution offers more flexibility for a future revision of the Neighbourhood Plan and allow it to better accommodate the eventual housing requirements allocated to it by the Local Plan Examination Inspector.

(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.

Southbourne Submission Neighbourhood Plan February 2021 Master Plan Proposals Map Annex B Extract

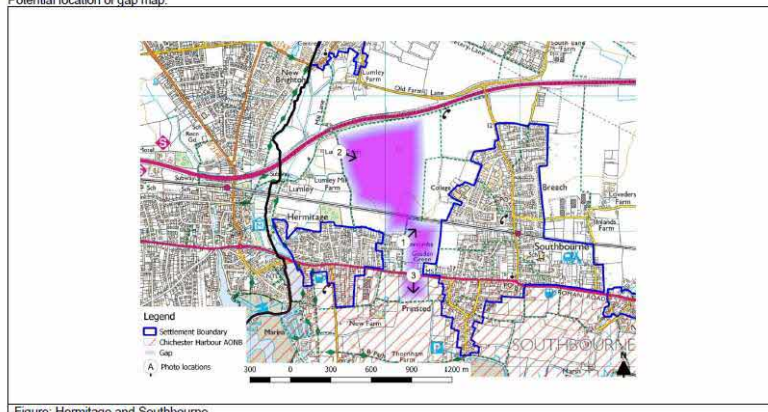


Page | 12

Landscape Gap Assessment (May 2019) Plans for Gaps 9 and 10

9. Hermitage and Southbourne

Potential location of gap map:



10. Southbourne and Hambrook

Potential location of gap map:

