



Mark Richards

Southbourne Parish Neighbourhood Plan Review 2019-2037

3 messages

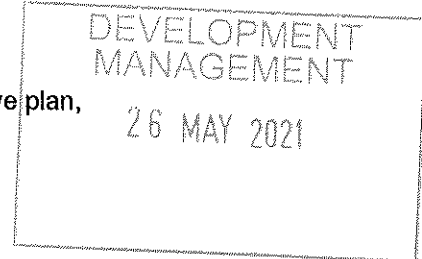
Mark Richards [redacted]
To: neighbourhoodplanning@chichester.gov.uk

24 May 2021 at 14:26

Dear Sir/Madam,

Please find attached our objections to various proposals made under the above plan,

Thank you

Mark SH & Angela J Richards
[redacted]

5 attachments

- SPNP Response Form - Affordable and Social Housing MSHR AJR.pages**
921K
- SPNP Response Form - Green Ring and Open Green MSHR AJR.pages**
900K
- SPNP Response Form - Access and road bridge MSHR AJR.pages**
920K
- SPNP Response Form - Wildlife + ecological impact MSHR AJR.pages**
902K
- SPNP Response Form - Waste Water Infrastructure MSHR AJR.pages**
920K

Neighbourhood Planning <neighbourhoodplanning@chichester.gov.uk>
To: Mark Richards [redacted]

24 May 2021 at 14:44

Dear Mr Richards,

Thank you for your representations but unfortunately I cannot open them? Would you be able to send them in a different format?

Many thanks for your assistance,

Valerie

Valerie Dobson
Principal Planning Officer



Representation Form

Southbourne Parish Neighbourhood Plan Review 2019-2037

The Neighbourhood Planning (General) Regulations
2012 - Regulation 16

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<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.

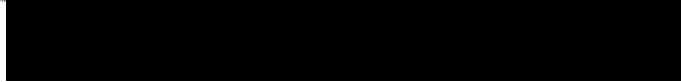
How to use this form

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	MARK S H RICHARDS & ANGELA J RICHARDS
Address	

Postcode	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]
Organisation (if applicable)	
Position (if applicable)	
Date	24.05.2021



PART B

To which part of the document does your representation relate?

Paragraph Number	5.28	Policy Reference:	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:
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Community Feedback - Key Matter Priority 1 – Utilities infrastructure/sewage treatment

The main priority and concern for the residents of Southbourne and Nutbourne is the inadequate capacity of waste water treatment at Southern Water's Thornham Plant, coupled with the inability of local pumping stations to cope with existing demand.

Save Our Harbour Villages have said 'the capacity will run out in 2024' for treatment, due to already planned developments. The local pumping station at Nutbourne has to be regularly 'pumped out', as it is unable to cope with existing demand.

Waste water problems at the almost completed Priors Orchard development, adjacent to the Plan area, are well known locally, and well documented via the Parish Council and Planning online.

In September 2020 Southern Water were issued with a formal warning by the Environment Agency due to a failure at Thornham Treatment Plant.

In 2019, Ofwat fined Southern Water £126 million.

CDC have recently (2021) filed a complaint against Southern Water.

The Plan does not fulfil this key community priority.

The statement that on SB2 para 5.28 'Southern Water confirm that new reinforcement is likely to be necessary' is far too weak and will leave the plan area exposed to even more waste water breakdowns, plus the potential for pollution and environmental damage in Chichester Harbour.

Recently after several weeks without significant rainfall, Thornham Waste Water Treatment Plant made a discharge of untreated effluent in to Chichester Harbour.

During a recent interview (15 April 21), the following question was asked of Southern Water:

With climate change maps predicting that some sites would be under water in 100 years' time, Carol Purnell (Con, Selsey) asked what plans Southern Water had for the works. The response – that coastal erosion and sea level rises would be discussed as part of the drainage and wastewater planning management process in the next year or so – raised even more concerns.

What improvements or modifications would you suggest?

Network reinforcement and infrastructure capacity improvements **MUST** be in place before any development commences, and not just 'likely to be necessary'.

Additionally our own Priors Orchard development has a treatment plant that has incurred challenges in processing & managing site waste and has recently installed a "sifting" filter to divide the waste to avoid blockages and back ups. However this will be to no avail if the Nutbourne plant cannot cope with demand.

We have no confidence in the existing waste water capacity.

This investment is required before we can support the Neighbourhood Plan.



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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	MARK S H RICHARDS & ANGELA J RICHARDS

Address	[REDACTED]
Postcode	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]
Organisation (if applicable)	
Position (if applicable)	
Date	24.05.2021

[REDACTED]

PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	SB13
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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:

Community Feedback - Key Matter Priority 3 – Green ring and open/green space

The original concept of the green ring has been lost in this policy. The original concept was for a green ring to encompass the village of Southbourne. This policy fails in that it will be central to the built area to the east of Southbourne village boundary where it intersects with the village of Nutbourne.

The illustrative masterplan submitted by i-Transport on the Schedule of Evidence contradicts that submitted on the Masterplan Briefing Report. The portion of green ring shown in this Evidence crosses many roads, therefore the concept cannot be delivered as intended.

The fields to the east of Inlands Road and to the north and south of Priors Leaze Lane are part of a vibrant wildlife corridor that links the South Downs National Park to the north and the Chichester Harbour AONB/SSSI to the south which includes the Ham Brook: a rare chalk stream of global importance.

In the plan this area is to be built over and the Ham Brook afforded minimal protection.

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What improvements or modifications would you suggest?

The Southbourne Masterplan and the i-Transport Evidence Masterplan already appear to indicate a difference in concept of the green ring, and as such we cannot support the plan.

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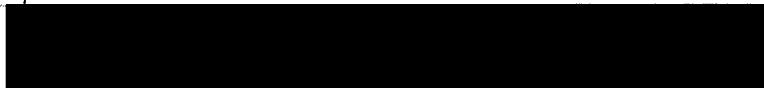
How to use this form

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	MARK S H RICHARDS & ANGELA J RICHARDS
Address	

Postcode	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]
Organisation (if applicable)	
Position (if applicable)	
Date	24.05.2021



PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	SB4
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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:

Community Feedback – Key Matter Priority 5 – Affordable and social housing

SB4 is to be lauded for its aspirations to deliver much needed affordable and potential social housing for the community. This need is accepted, and it is understood that some of this development will be close to existing homes, however the plan is unlikely to deliver on this crucial element.

The plan area is subject to multiple ownership, with construction involving multiple developers. It is a well-known fact that both land owners, then construction companies seek to maximise their profits, resulting in reductions by percentage in affordable housing delivery, recompensed only by contributions to subsidies.

The SPNPR Submission Plan was published and submitted to CDC during February 2021.

Para 5.43 SB4 states that 'Affordable Housing' need is greater than that identified by the CDC Housing Register 3 times the need'.

During the same month February 2021, the Archbishops' Commission announced the publication of the Coming Home Report, which 'recommends that the CofE commits to using its land assets to promote more truly **affordable** homes, through developments that deliver on our five core values: sustainable, safe, stable, sociable, satisfying'.

The Church Commission for England (CCE) owns 69ha of land within Southbourne Parish. This is a single owner, single site.

The agents for the CCE land have published a detailed Vision Document including Concept Masterplan, which includes schools and other community facilities close to and complementing the existing Southbourne Hub of Bourne Community College, St John's Church, shops and railway station.

The Archbishops' Coming Home Report was discussed at length in the House of Lords on 24 March 2021 – details can be found on the Hansard Report for that day.

In the light of the above information, we urge Southbourne Parish Council and CDC to pause the Neighbourhood Plan process, and reconsider the options available to truly deliver on this vital policy.

What improvements or modifications would you suggest?

We urgently request that the Neighbourhood Plan process be paused for a reconsideration of the CCE Vision Document in the light of the SPNPR statement of the need for Affordable Housing and the publication of the Archbishops' Commission 'Coming Home Report'.

We are unable to support the plan as a more deliverable policy alternative exists which would benefit the Southbourne Parish Community.



Representation Form

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Use of your personal data

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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	MARK S H & ANGELA J RICHARDS
Address	

Postcode	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]
Organisation (if applicable)	
Position (if applicable)	
Date	24.05.2021



PART B

To which part of the document does your representation relate?

Paragraph Number	5.104	Policy Reference:	SB18 (&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:

Community Feedback – Key Matter Priority 2 – Access and road bridge

Para 5.104 SB18 states 'a separate road and cycle bridge is required (Policy SB2)'.

The Schedule of Evidence contains a Transport Impact Study, which states 800 new homes 'can be delivered ahead of the new bridge', thereby already contradicting the plan statement.

This is highly contentious and questionable and will destroy our villages.

Two of the key objectives defined in the pre-submission Sustainability Scoping Report were to improve road safety and reduce the impact on residents from the road network.

CDC have commissioned Stantec to provide a Level Crossing Baseline Safety Review. The conclusion from the report is that 750 dwellings north of the railway line 'can be provided before conditions approaching the crossing reach the indicative trigger point for a bridge to be provided'.

The east/west access routes of Cooks/ Priors Leaze are narrow country lanes, joined from the south by Inlands Road, from where a 'blind bend' leads to the east. The 'Inlands Square' concept shown in the Masterplan Annex B to site a Community Hub at the intersection of these three lanes will inevitably attract more traffic, exacerbate road congestion, thus increasing the impact on residents and failing to improve road safety.

In their 'Planning for the Future' document of late 2020 the Ministry of Housing Communities and Local Government stated intent on behalf of the Government to 'Deliver on our commitment to infrastructure first'. This is not something that emerges from the Southbourne Parish Neighbourhood Plan and it has been mentioned that the essential infrastructure such as a road over the railway line may be achieved only after road chaos follows the additional houses. This does not conform to any notion of 'infrastructure first', which should endeavour to pre-empt such outcomes.

Policies SB18 & SB2 plus the Schedule of Evidence fail to deliver the objectives outlined in the scoping report, and also fail to deliver the second highest priority of the Southbourne and Nutbourne community. The Stantec report indicates a trigger point of 750 dwellings north of the railway line before a new bridge is required, which also fails on the community priority of infrastructure first.

What improvements or modifications would you suggest?

The road layout proposed in the Transport Impact Study is unworkable and will result in transport gridlock across 40 square miles of our community at key junctions.

A full road safety audit, and not just trip calculations, is required.

We moved to this area due to it being an AONB could with practical facilities but the ongoing housing development cannot be supported by the current infrastructure-volume of traffic passing east and west from Portsmouth to Chichester via the A259 & even being able to exit our development is fraught with risk given the current volume of traffic.

We are unable to support the plan as it does not deliver SB18, SB2 and the objectives identified in the Sustainability Appraisal Scoping Report.



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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	MARK S H RICHARDS & ANGELA J RICHARDS

Community Feedback - Key Matter Priority 4 – Wildlife/ecological improvements

SB14 para A states that 'development proposals should take account of the protected and other notable biodiversity species in the neighbourhood area as set out in Appendix D'.

Appendix D (Sussex Biodiversity Record Centre Report) does not appear to show any survey details relating to the fields at the east of the plan area. As development proposals are linked to identification using Appendix D Records, Policy SB14 fails. In addition, Appendix D expires on 14 July 21.

Details of species recorded locally, including on i-record, include:

Breeding pair of kestrels, kite, buzzard, sparrowhawk, barn owl, jay, pheasant, greater spotted woodpecker, breeding pair green woodpeckers. Goldcrest. Long tail, coal, great and blue tits, variety of finches, robins, wrens, thrushes, hedge and house sparrows, blackbirds.

Frogs, toads, newts, hedgehogs, fox and roe deer.

At least 2 species of bat, identified using bat detector.

North of Cooks Lane:

Skylarks, linnets (flocks of up to 50 counted), whinchat (have been spotted using Cooks Lane area on migration route), yellowhammer – all RSPB red list birds.

Housemartin, swift, swallow, whitethroat, goldcrest

Trees and hedgerows are vital as navigation aids, and the land to the east of Inlands Road, Nutbourne, includes a line of poplars, cherry and field maple. To the south of the plan area, a line of lime trees subject to a Tree Protection Order cross the area designated as A259 access. Glorious fern banks line Priors Leaze Lane, and ancient hedgerows line Cooks Lane.

All the above information appears to have been excluded from Appendix D.

Consultation Statement Appendix 22 Point 50 - Chichester Harbour Conservancy have suggested that the policies need strengthening as they do not feel they address the protection afforded by the AONB designation nor the Special Protection Area. They would prefer dwellings to be built north of the railway line (further from the AONB boundary). A recent report from Natural England describes Chichester Harbour as 'one of the most important sites for wildlife in the UK and globally important for migratory birds' now being in an 'unfavourable and declining' condition, 'a story of catastrophic decline' citing amongst other damaging factors 'coastal squeeze'.

A little known fact to those outside of the plan to the east of Inlands Road area is that it is already a thriving wildlife corridor. For example, the Nutbourne Marshes are home to deer raising their young in the reed beds, then migrating through the plan area to the east towards the south downs. A common seasonal sight.

It is therefore shocking that CDC have overlooked this diverse and abundant area in the Strategic Wildlife Corridors LPR December 2018. The corridor contains one of the most globally rare forms of water course – a chalk stream. The Neighbourhood Plan, despite mitigations, is nothing short of environmental destruction, which will inevitably impact the wonderful AONB and the South Downs.

What improvements or modifications would you suggest?

Due to the looming expiry of Appendix D, and the omission of the plan area, I/we are unable to even consider the plan until a full wildlife and ecological survey of the whole of the unrecognised wildlife corridor has been conducted and published.

The plan does not deliver on the community key matter priority 4 of wildlife/ecological improvements; it does in fact deliver the complete opposite.

We cannot support this plan due to the environmental and wildlife devastation it will cause.

We urge CDC to consider alternative land options.