



## 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](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**

#### 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.

<b>PART A</b>	<b>Your Details</b>
<b>Full Name</b>	Sarah Grant & David Kerley
<b>Address</b>	
<b>Postcode</b>	
<b>Telephone</b>	
<b>Email</b>	

Organisation (if applicable)	
Position (if applicable)	
Date	30/05/2021

## PART B

To which part of the document does your representation relate?

Paragraph Number	A	Policy Reference:	SB14
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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:

Wildlife/ecological improvements

In the plan the SB14 paragraph 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'.

When reading Appendix D there does not appear to have been a survey relating to the area at the east of the plan area. As development proposals are linked to identification using Appendix D Records, Policy SB14 fails, Appendix D also expires on 14 July 2021.

The following are recorded species seen in this area recently:

Breeding Kestrels, Kite, Buzzard, Sparrowhawk, Barn Owl, Jay, Pheasant, Greater Spotted Woodpecker, breeding Green Woodpeckers, Goldcrest, Long tail, Coal, Great and Blue Tits, Finches, Robins, Wrens, Thrushes, Hedge and House Sparrows, Blackbirds, Skylarks, Linnets, Whinchat, Yellowhammer, Housemartins, Swifts, Swallows, Whitethroats, and Goldcrests.

Many migrating birds using the this area as a navigational aid while migrating and many are on the RSPB red list

Also recorded are Frogs, Toads, Newts, Hedgehogs, Fox and Roe Deer and at least 2 species of Bat and again some of these are protected species.

Many of the trees that will be affected have Tree Protection Orders, specifically a line of lime trees South of the plan cross the area designated as A259 access.

The fern banks and ancient hedgerows in Priors Leaze Lane and Cooks Lane will be all be completed decimated as these roads are just small country lanes and would have to be doubled in width to incorporate 2 way traffic and pedestrian access.

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

The land East of Inlands Road is an important and thriving wildlife corridor where many breeding Deer are seen with their young before moving up to the South Downs,

Consultation Statement Appendix 22 Point 50 - Chichester Harbour Conservancy have suggested that the policies need strengthening as they do not address the protection afforded by the AONB designation nor the Special Protection Area.

CHC advise dwellings to be built north of the railway line (further from the AONB boundary). 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'.

It is completely unacceptable that CDC have ignored 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.

This Neighbourhood Plan would result in an environmental devastation which will impact hugely and irreversibly on the 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, 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.

Alternative land options have to be considered to prevent an environmental disaster.

### 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:

#### Utilities infrastructure/sewage treatment

One of the main priorities and concerns for the residents of Southbourne and Nutbourne is the complete inadequate capacity of waste water treatment at Southern Water's Thornham Plant and the inability of local pumping stations to cope with the existing demand already.

Save Our Harbour Villages have stated that 'the capacity will run out in 2024' for treatment with the planned developments that are approved.

Nutbourne pumping station has to be regularly 'pumped out' into the harbour, as it is already unable to cope with existing demand and this is during dry weather.

There are already well documented waste water problems at the new Priors Orchard development that is still not totally completed and adjacent to the Plan area.

In September 2020 Southern Water were issued with a formal warning by the Environment Agency due to a failure at Thornham Treatment Plant and in 2019, Ofwat fined Southern Water £126 million.

CDC have also filed a complaint against Southern Water this year (2021)

The statement that on SB2 para 5.28 'Southern Water ..... confirm that new reinforcement **is likely** to be necessary' is a complete understatement and will result in more waste water problems as well as the pollution and environmental damage in Chichester Harbour and our local waterways.

Only recently and after a long period of dry weather, Thornham Waste Water Treatment Plant made a number of discharges of untreated effluent in to Chichester Harbour, just proving that without a huge investment and complete overhaul by Southern Water, no further developments can even be considered.

Currently there are no plans for huge investment, just 'discussions' by Southern Water.

### 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'.

We have no confidence in the existing waste water capacity therefore we cannot support the Neighbourhood Plan.

### 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:

#### Green ring and open/green space

The original idea was that the green ring would surround and encompass the village of Southbourne. This policy completely fails as the plan indicates that the green ring will be through the centre of the built up area to the east of Southbourne village and West 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 fails completely.

The land 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 which is a rare chalk stream and is of global importance.

In the plan this natural area is to be concreted over and destroyed with very little protection the chalk stream that will inevitably cause huge environmental impact on the area.

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

The Southbourne Masterplan and the i-Transport Evidence Masterplan do not agree with the same concept and therefore we cannot support the plan.

## 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:**

### Affordable and social housing

We do accept that there is a need for affordable social housing in this area and that some of it will need to be close to existing properties, however we do not have any confidence that this plan will deliver real affordable social housing and the only people benefitting from this plan will be land owners and developers.

The lands designated in this plan West of Southbourne are under multiple ownership, with construction involving multiple developers. Both land owners and developers seek to gain maximum profit resulting in reduced affordable housing, recompensed only by contributions to subsidies.

The SPNPR Submission Plan was published and submitted to CDC during February 2021. During February 2021, the Archbishops' Commission announced the publication of the Coming Home Report, which 'recommends that the CofE uses 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 land owner, single site and is obviously the most logical position for the plan as this has the least detrimental effect on environment, residents, traffic etc. .

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.

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

We urgently request that the Neighbourhood Plan process be stopped and to reconsider 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.

**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** X Have Comments

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

**Access and road bridge**

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.

Para 5.104 SB18 states 'a separate road and cycle bridge is required (Policy SB2)'. The Transport Impact Study shown in the Schedule of Evidence states that 800 new homes 'can be delivered ahead of the new bridge' suggesting that only after congestion and complete chaos has been suffered by the local community that the building of a bridge will even be considered. This already is completely contradicting the plan statement and in the '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'

There is little confidence in the developers that the building of this bridge would ever actually come to fruition, therefore completely destroying our village community.

The junction of Cooks/ Priors Leaze and the north of Inlands Road are narrow country lanes that can only accommodate one vehicle at a time, there are close boundaries of properties either side in Inlands Road so the road here would not be able to be widened to permit two way traffic. The 'Inlands Square' concept shown in the Masterplan Annex B to site a School and Community Hub at the intersection of these three lanes is totally ridiculous and inevitably there will be a huge increase to the volume of traffic. Congestion will be at a totally unacceptable level as only one vehicle could pass at any time; road safety would be unachievable, especially putting children at risk due to the lack of pedestrian pathways. There will also be a huge negative impact on residents with the air pollution, noise and reduced access leading to major safety issues.

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

We strongly and unreservedly oppose the Southbourne Parish Neighbourhood Plan as we believe this is completely the wrong area to place such a huge development.  
This is a semi rural environment which is exactly why the residents chose to live here, to enjoy the countryside and the peace as well as the village setting.

The SPNP will completely devastate the area, the loss of Nutbourne village as its own identity will be damaging to the whole area as soon Hambrook, Chidham and all the other local villages will just be joined up in one huge housing estate!

We have already accepted the Priors Orchard Development and the approved development already started North of Cooks Lane, any more new housing in this area is totally unacceptable.

The land owned by Church Commission West of Southbourne is by far the obvious choice, having less impact on local residents and complementing the existing infrastructure and facilities.