

We would like to object in the strongest possible terms to the proposed Southbourne and Nutbourne Neighbourhood plan on the following points.

1. The parish has over the past few years had a number of developments created within it which have greatly changed the character and look of the village.
2. The amenities of the parish cannot support such an increase in the proposed housing developments. There is insufficient capacity in local GP and dental surgeries and there is little in the way of local shops selling essential supplies for such developments to be sustainable.
3. The A259 is a very busy road during normal times and when it is used as a relief road for the A27, during accidents or roadworks, it becomes positively dangerous to try and cross. The average car ownership in 2018 was 1.2 cars in the UK and 1.4 cars per household in the South East. This would represent an increase in traffic on the A259 of at least 500 extra cars each and every day.
4. This land also provides vital wildlife corridors between the AONB of Chichester Harbour and the South Downs National Park.
5. In 2015 the land to the west of Pottery Lane had permission for 26 houses refused by CDC and an appeal on that decision was also refused, please refer to the Inspectorates decision:-
https://publicaccess.chichester.gov.uk/online-applications/files/259EA69DE2D17BBE7995D593C2F2EF69/pdf/13_03157_OUT-APPEAL_DECISION_-_THE_PLANNING_INSPECTORATE_13.02.15-1967917.pdf
Where reference was made to the need for green spaces between the villages to retain their unique identities
6. Drainage in the area has been problematic in the past in this area and the work done to mitigate this a few years ago has probably now been counteracted by the developments we have seen in the parish over the past couple of years. Thornham waste treatment centre was cited in the Chichester Observer as recently as 4th August 2020 as discharging untreated sewage into the harbour. In 2018 Fishbourne Parish Council raised concerns that ***“Apuldram already unable to cope with current residents so cannot add any more capacity. Onsite treatment systems unacceptable”***
Therefore can the system cope with 1250 or more homes?

Whilst I realise that the Council is under instruction from the Government as to the amount of housing to be constructed in the area it is important to note that because of the AONB and the National Park there is only 26 percent of the available land in which to place 100% of the development. I would therefore urge Chichester District Council to consider these points before accepting the neighbourhood plan and its further large scale developments within all the coastal villages both now and in the future before we become one gridlocked, disenfranchised, unhappy conglomerate.

Please also consider the following technical points on the proposed plan and our suggestions before approving this neighbourhood plan.

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.

Suggestion:-

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.

We urge CDC to consider alternative land options.

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.

Suggestion:-

I 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.

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.

Suggestion:-

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.

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

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 is afforded minimal protection.

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.

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.

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

Gillian & Raymond Cooper

██████████
██████████
██████████
██████████