



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. 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**

PART A	Your Details
Full Name	Dr Paul and Mrs Jo Mansell (and Chris [REDACTED], Helen [REDACTED], Robbie [REDACTED])
Address	[REDACTED]
Postcode	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED]
Organisation (if applicable)	n/a
Position (if applicable)	n/a
Date	2 June 2021

Our family 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 and Hambrook villages, with their own identities, will be damaging to the whole area and will likely spread to other gaps. Chidham and all the other local villages are in real danger of being 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 in danger of undermining the character of the area based on 7 key issues detailed below in this response form.

It is suggested that the land owned by Church Commission West of Southbourne is by far the obvious choice, having less impact on residents and complementing the future housing plans by building on the existing village/town Hub around Southbourne School and gym – the current community hub. However, the development consortium driving the East have ‘bulldozed’ their way through the process, often using shallow robustness of analysis (eg the i-Transport plan) and this dangerously compromises the planning processes which the Examiner is now overseeing. We hope that the Examiner can shed light on where the key process steps have been misused to result in the potential for a very poor decision adopting a tempting but badly conceived, alternative plan to the east. We also highlight that hambrook and Nutbourne, the villages equally affected, have not been included in reviewing these plans. This alone, fouls the democratic process.

PART B – 1st issue raised – No account for Listed Building Situation – [REDACTED] (Grade 2)

To which part of the document does your representation relate?

Paragraph Number	I am not sure – please help	Policy Reference:	I am not sure – please help
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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:

This Neighbourhood Plan has made no allowance for our Listed Building – [REDACTED] – built in 1736, on Priors Leaze Lane. They have used the wrong location details and failed to apply the correct posting address. The Mansell Family have lived, since 1997, in the most prominent Listed building (Grade II) affected by the development plans. The Plan has detailed proposals for building on all 4 sides of our listed building – forever destroying its situation and contribution to local landscape.



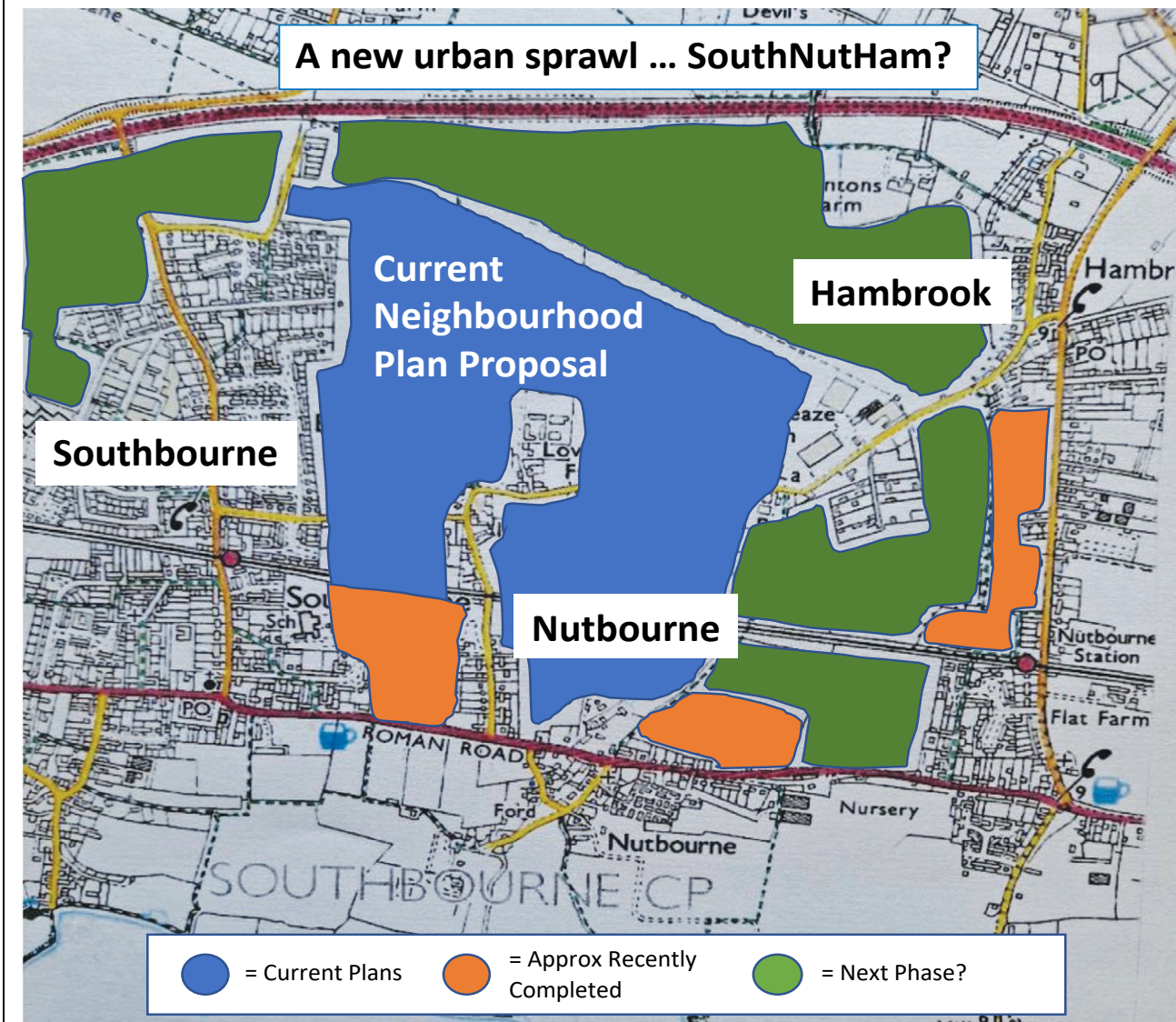
At no time have we received any communications from the Council. They say that they have dropped leaflets, but no-one in Inlands Road or Priors Leaze Lane have received one. All will write signed statements confirming the lack of appropriate communications – which is very different to what they have stated in their summary documents. The parish council planners say there were also other opportunities to comment, but small adds on pages 30+ and 40+ of the local parish magazine are not conducive for key issues being spotted.



At no time would we have supported the plan without due consideration of the environmental and social impacts. On all 4 sides of our home, that is currently open fields, the new housing estates will be built. Our lives will be consumed by a new town being built around us for the next 10-15 years.

Our family believe the Southbourne Parish Neighbourhood Plan Review (SPNPR) 2019 -2034 as submitted to Chichester District Council (The Plan) has been developed without due regard to the local population and in places has gone against legal Regulations and Policies. Also, we note that:

- We have requested SB12. EV2 be amended to show that Loveders Farmhouse is in Nutbourne, but unfortunately this request was declined. The Heritage website information mistakenly lists the house in the Parish of Southbourne, omitting reference to Nutbourne, and we are therefore disappointed that historical and location accuracy has not prevailed in the Southbourne Neighbourhood Submission Plan. This opens up a much wider and more serious issue for the examiner to consider, discussed below.
- The Parish Plan restricts views and comments to Southbourne Parish, but as the plan shows, it seeks to combine the towns and villages of Southbourne, Nutbourne and Hambrook. This is devastating and must be considered by all 3 villages – this has not happened and the plans have been almost totally hidden from the villages of Nutbourne and Hambrook. When calling door-to-door, I had 98% of those I chatted with (c 65 households) stated that they had no knowledge of the development proposals by Southbourne. To us, this is a very serious issue, as shown on the map below:



What improvements or modifications would you suggest?

We would hope the Examiner to highlight the nature of the Listed building and make stronger independent representation that the plans affect Hambrook and Nutbourne equally to Southbourne. To-date they have not been considered. It is hoped that the Examiner can bring visibility and fairness to the significant responsibility they hold in ensuring that the right issues are being considered by the right people at the right time.

PART B – 2nd issue raised – Wildlife / Ecological

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:

As the occupants of [REDACTED] for the past 23 years we have had first-hand experience of the wealth of wildlife that survives in this area. Having a PhD in environmental sciences and being the lead advisor for the development of the AONB / Chichester Harbour's 50 year plan, I am well educated on the local environmental issues. The proposal for the development is cutting across a critical green gap that provides a much needed corridor between the AONB and the National park. Specific points are shown below:

- 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.
- This absence misses the following key species that I have personally seen: 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. Also, many migrating birds use this area as a navigational aid while migrating and many are on the RSPB red list. I have also had abundant Frogs, Toads, Newts, Hedgehogs, Fox and Roe Deer and at least 2 species of Bat and again some of these are protected species. Examples of my photos are below:



- 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.

PART B – 3rd issue raised – Waste Water

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.

PART B – 4th issue raised – Green Ring

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 – 5th issue raised – Affordable Housing

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 – 6th issue raised – Transport & Road bridge

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:

Transport Modelling

Having been a senior Government Advisor for over 20 years (such as advising the DfT Board on many of their transport strategies from 2004-2018) I am intimately aware of the strengths and weaknesses of using transport modelling to ascertain risks/opportunities of proposed schemes. Indeed, many national investments have been fundamentally flawed by applying the wrong assumptions. In the case of the Transport Plan underpinning the Parish Plan, i-Transport document, there are a number of serious flaws that render the document dangerously irresponsible:

- The model uses overly optimistic data to inform the statistics – such as reducing the number of cars/vehicles likely to be affecting the peak hours movement of traffic. This gives a 150% improvement on other data that if changed to assumptions more typical of this type of area/development, would give a very different answer. Verified assumptions are needed to remodel the period before, during and after the build. The remodelled data would likely demonstrate a massive increase at key junctions that would provide gridlock for many of the community roads at peak times.
- The transport plan makes no allowance for the development period with large vehicles travelling down single lane capacity such as Priors Leaze lane. In April I personally witnessed two traffic jams of between 30-40 minutes when a medium sized skip/lorry could not pull to the side to let a Ford van Transporter pass alongside. This situation will be very common if the development is given the green light.
- All development should be 'infrastructure led'. This is a national policy and the Parish Council has been out played by very adept developers who have the financial clout and expertise to 'run rings around them'. As a result, many of the road alleviation schemes are vague areas to be considered. This leaves the developers able to progress without having first built the fundamental infrastructure that would alleviate transport pressures during the build phase.
- Above all else is the matter of safety. As the Governments number one transport principle for DfT, the safety of our community walking and cycling along the narrow roads will be fundamentally affected.

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'

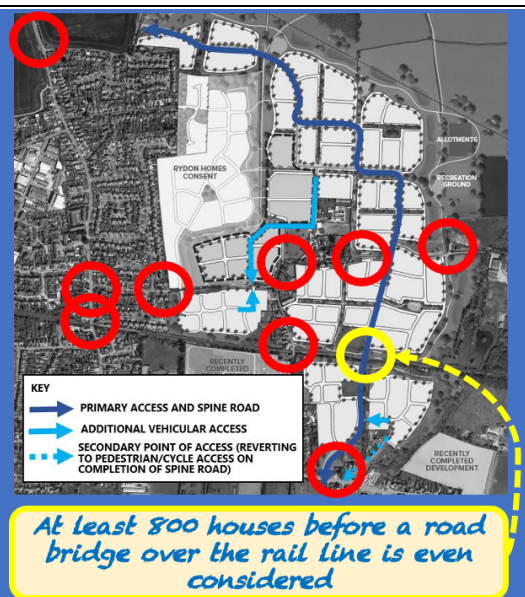
There is little confidence in the developers that the building of this bridge would ever actually come to fruition, therefore completely destroying our village community.

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?

Above all else is the matter of safety. As the Government's number one transport principle for DfT, the safety of our community varied modes of transport, such as jogging, walking and cycling along the narrow roads will be fundamentally affected. There are no plans for additional lighting, pavements, cycle lanes on the existing roads – it is wrong and naïve to think that only the new paths will be used. This needs a fundamental review which the Examiner can direct attention towards.

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.

PART B – 7th issue raised – The process has not been open, fair and balanced

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	SB2 and others incl. Masterplan
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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:

A thorough analysis of the consultation questionnaires has shown that fewer than half of the respondents expressed a preference for the Southbourne AND Nutbourne Plan, therefore the decision to 'go east' has not been made by the community.

Throughout the Plan, terms such as 'land, routes, form, access, design, facilities' are frequently used. One glaring omission is 'human beings'.

There appears to be no consideration in the Plan of the existing age, health, mobility and indeed mental health profiles of those residents most likely to be affected during the lengthy construction phase.

We now know that vital infrastructure such as roads will not be in place at commencement, or if ever, during the 10-15 year build.

Who therefore takes overall and individual responsibility for the inevitable stress and anxiety we will undoubtedly have to endure - potentially impacting our health - given our well documented experience with nearby construction to date?

Where does this feature in 'The Plan?'

What improvements or modifications would you suggest?

Pause the Plan Process. Reconsider the allocation figure of 1250 houses for Southbourne Parish. Reconsider the land options available.

Consider AND take responsibility for the inevitable health impacts as detailed above which will be sustained by existing Parish residents by and during the implementation of this and any other Plan.