**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	Chris Locke			
Address	Rowan House Baffins Lane Chichester			
Postcode	PO19 1UA			
Telephone				
Email				

Organisation (if applicable)	Henry Adams
Position (if applicable)	Land Manager
Date	2/6/2021

# PART B

# To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	SB16				
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:							
Please see accompanying representations							
		(Continue on sep	arate sheet if necessary)				
What improvements or modifications would you suggest?							

Please see accompanying representations

(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.



F.A.O Parish Clerk Southbourne Parish Council The Village Hall First Avenue Southbourne Emsworth PO10 8NH

28<sup>th</sup> May 2021

#### Re. Land adjacent to Prinstead Lane, Southbourne

**Dear Parish Clerk** 

Henry Adams LLP act on behalf of West Sussex County Council (WSCC) and we have been instructed to submit representations on their behalf in the ongoing Southbourne Neighbourhood Plan Reg. 16 Consultation which ends on Thursday 3<sup>rd</sup> June 2021. We thank you for letting us have the opportunity to comment on the draft Neighbourhood Plan and our comments relate to the allocations of land as Local Green Spaces, and specifically land adjacent to Prinstead Lane. For clarity, I have attached a Location Plan showing the site in red.

### The Site

The site is approximately 0.619 hectares in size and is currently in use as grazing land. The site is accessed from Prinstead Lane, and is gated with no public access allowed other than the tenant who is under a grazing licence. WSCC were approached by the Parish Council when the land was being considered for its suitability as Local Green Space, and WSCC replied formally on the 31<sup>st</sup> July 2020 to say that the land is not suitable for the proposed allocation.

### Southbourne Neighbourhood Plan

The draft Southbourne Neighbourhood Plan Policy relating to Local Green Spaces is SB16, and accompanying the consultation document is a Local Green Space report. The Local Green Space report states that the land is 'tucked away from roads and traffic', when it is in fact merely 100m away from the A259 so road noise would be significant. The fact it is in an 'open green space' is because it is grazed by horses, which would then limit the wildlife available in the field.

The policy also states that there is a covenant in favour of Mrs Welch and that the site has been 'bequeathed for use by the children of Prinstead by Mrs Walsh (?)'. From reviewing the Land Registry Title for the land there are a number of covenants that restrict what the land can be used for, such as erecting a tank pump or the selling of intoxicating liquors, but it does not state as far as we are aware that the land was left for the enjoyment of the community and there are no legal obligations for the landowners to do this. The fact that the field was used nearly 80 years ago for the use as playing fields in our view is not relevant, and there are no current planning uses on the land currently other than equestrian.

#### **National Planning Policy Framework**

SB16 states that the proposed Local Green Spaces have been designated in accordance with the National Planning Policy Framework (NPPF) which sets out the following requirements at paragraph 99:

Henry Adams LLP Rowan House, Baffins Lane, Chichester, West Sussex PO19 1UA 01243 533633 land@henryadams.co.uk henryadams.co.uk

Sales ► Lettings ► Commercial ► Rural ► Development ► Fine Art



The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

It then goes on to state (paragraph 100) that Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.

Planning Practice Guidance then goes on to state what types of green areas can be identified as Local Green Space. This suggests the following should be considered:

The green area will need to meet the criteria set out in paragraph 100 of the National Planning Policy Framework. Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.

In response to the NPPF policies outlined above the site is simply an equestrian field with no public access. It does not serve the community, nor richness in its wildlife. The site is bordered on all boundaries by trees, so is not easily visible from surrounding vantage points. We would be concerned that the proposed designation has been placed to prevent development, which is not the aim of the NPPF, especially with Chichester District Council currently experiencing housing supply shortfall.

We would also like to note that Henry Adams have made the Parish Council aware of our objections on a number of occasions, and offered to meet to discuss if required.

In conclusion, it is our view that the land at Prinstead Lane, Southbourne does not meet the criteria set out in the NPPF as Local Green Space. We respectfully request that the proposed designation is reconsidered and removed.

If you require any further details, please do not hesitate to make contact.

Yours sincerely

Chris Locke Henry Adams

