



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	Zachariah Denton
Address	Rowan House, Baffins Lane, Chichester PO19 1UA
Postcode	PO19 1UA
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Email	████████████████████
Organisation (if applicable)	Henry Adams LLP

Position (if applicable)	
Date	03/06/2021

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:
<p>Please see attached statement.</p> <p>(Continue on separate sheet if necessary)</p>

What improvements or modifications would you suggest?
<p>Amendments to the proposed Wildlife Corridor</p> <p>(Continue on separate sheet if necessary)</p>

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/addressed or attached.

Southbourne Neighbourhood Plan Review 2021 Regulation 16 Version

Representations on behalf of
Chichester Grain

June 2021



1 Introduction

- 1.1 Henry Adams LLP act on behalf of Chichester Grain in respect of land at Chichester Grain Stores, Hambrook, Southbourne. A site location plan is produced at Appendix 1, highlighting the location of our clients land.
- 1.2 These representations respond to the Regulation 16 Consultation version of the Neighbourhood Plan Review (2020). The Neighbourhood Plan is being reviewed to ensure that its Policies are aligned with the Chichester District Local Plan.
- 1.3 We appreciate that we are late in the day when making our representations, as such, they are written to specifically relate to a precise element of the proposed Plan.
- 1.4 Policy SB13 of the proposed Neighbourhood Development Plan relates to the designation of a Green Infrastructure Network. The plan showing this is proposed corridor produced in Appendix 2. This is the element of the proposal of which we are raising objection to in its current form and scale.

2 Approach to wildlife corridor

- 2.1 Policy SB13 (D) states that 'proposals leading to a loss of land lying within the Network will not be supported'. We are of the view that our clients land has development potential and could be well placed to assist in the delivery of additional housing number required within the emerging Local Plan Review and are of the view that the wildlife corridor is quite extensive and should be reduced in size (in accordance with recommendations
- 2.2 We acknowledge the importance of the protection of wildlife generally, and the local eco-systems, however, this submission is supported by an Ecological survey which confirms that our site should not be covered by a Wildlife Corridor to the extent currently proposed. The Wildlife Corridor should be reduced to the immediate site and not as currently proposed under the policy SB13.

Ecological Survey Results

- 2.3 The land at Chichester Grain lies adjacent to the Ham Brook Chalk Stream. The draft Southbourne Parish Neighbourhood Plan seeks to create a Wildlife Corridor as highlighted along this section of stream. It is our view that the proposed extent of the wildlife corridor is excessive and should be reduced. It is also our view that the wildlife corridor could accommodate a break to provide a means of access to our client's site, without harming the purposes of the corridor.
- 2.4 The recommendations of the report are to reduce the scale of the wildlife corridor and also ensure policy flexibility to allow access through these areas and appropriate requirements to enhance and mitigate against any proposed development.

- 2.5 In terms of the details, of the site, habitats present within the development area are of low ecological value at site level. It is noted that there are sites with intrinsic nature conservation value within the area, however, there are suitable mitigation and compensation methods which could protect these habitats.
- 2.6 The mitigation methods that could be proposed to remove any significant harm to ecological value of the land (which is low as existing), comprise:
- Provision for CEMP for any proposed development
 - Retained habitats on site borders should be enhanced
 - Provision for an ecologically sensitive lighting scheme
 - Use of bird boxes within any proposed development
 - Inclusion of Hedgehog Highways
- 2.7 As shown, the land at Chichester Grain is of low ecological value, and should not be included, to the extent currently proposed, as a wildlife corridor within Policy SB13 of the Southbourne Parish Neighbourhood Plan. Furthermore, we have set out mitigation methods which could be applied to any forthcoming application or allocation of the land, which would enhance the ecological value of the site, and protect the intrinsic value of the sites within the locality.

3 Housing allocations and numbers

- 3.1 When considering the draft site Allocations, there is a single major housing allocation in the Neighbourhood Plan. Whilst this is an important contributor to housing delivery for the District, in relying on one site, the Parish may have issues around early delivery, given the likely lead in times for sites of this scale. Accordingly, the Parish should give consideration to a mix of size sites in their allocation to aid delivery of housing across the extent of the Neighbourhood Plan period.
- 3.2 It should also be noted that the Neighbourhood Plan is prepared following early drafts of the Local Plan Review documents. This has been on hold for some time, pending further technical work on highways, impact upon water quality and foul drainage treatment capacity. Accordingly, following adoption of the Neighbourhood Plan, based on the current timeline, this could be quickly overtaken and become out of date as the Local Plan review is advanced and subsequently adopted.
- 3.3 The Local Plan Review process may also require a greater number of homes in the area and a mix of housing sites. Our clients land is therefore well placed to provide additional housing on a smaller site, which is not reliant on significant infrastructure improvements.

4 Benefits of the sites allocation

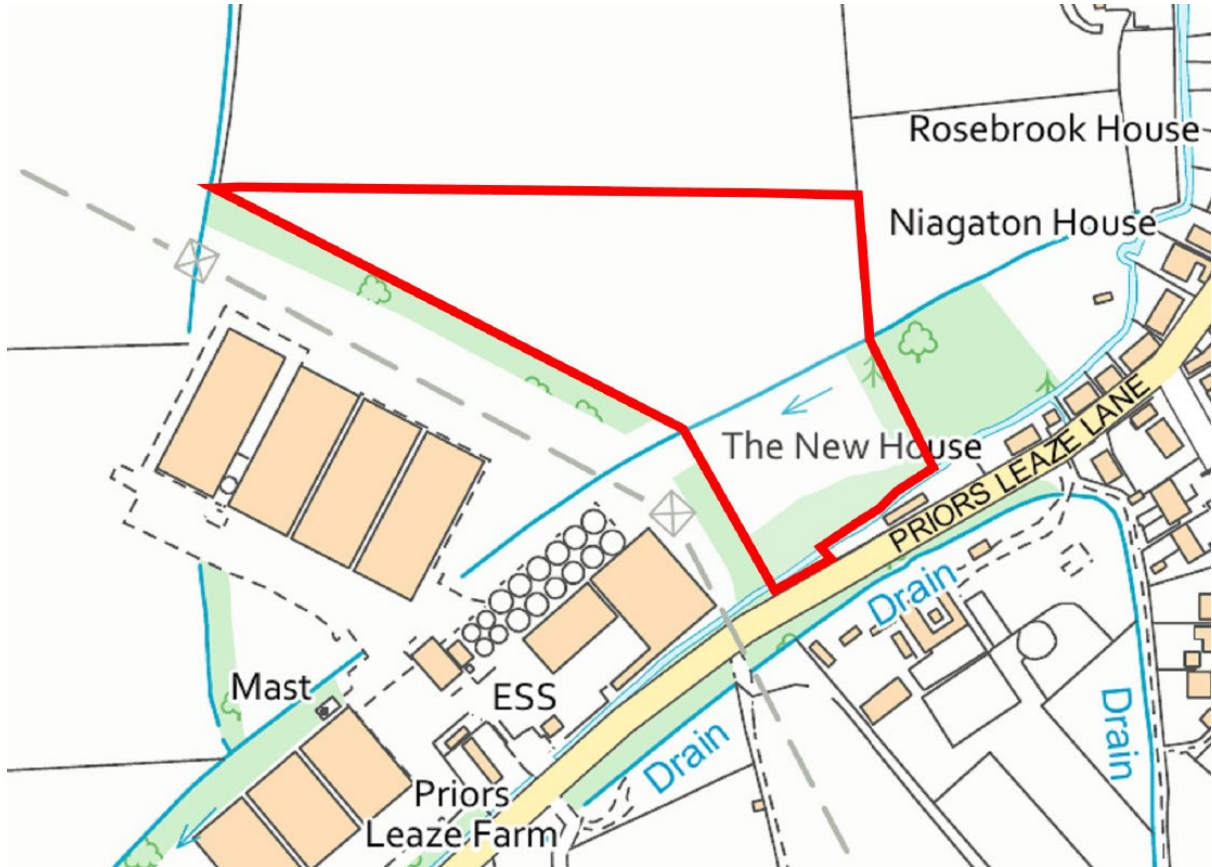
- 4.1 Whilst we accept the Neighbourhood Plan has progressed to this stage, based on the comments above, it is likely that the Neighbourhood Plan will need to be reviewed at an early stage, give the stage of preparation of the Local Plan Review. Accordingly, further sites should be considered at this stage to ensure the Neighbourhood Plan can remain up to date and the Parish should seek to deliver a mix of sizes of sites to aid the speed of housing delivery, which is currently falling short within the District.
- 4.2 Our client's site is well placed to accommodate any additional numbers required and offers a distinctively different scale of development to that proposed in the single large site allocation. It can also be delivered, whilst protecting this part of Southbourne, but also Hambrook to which is more readily relates.
- 4.3 The Allocation and development of this land would provide a number of benefits to the local community;
- The development will include a mix of high-quality homes, including affordable to meet the varying needs of the community;
 - The site is well-connected to local services and facilities, within walking distance of the post office, train station, employment;
 - Support the viability of local services and facilities;
 - The site is not subject to any environmental designations or constraints and its development would not impact the South Downs National Park or Chichester Harbour AONB
 - Retention of existing boundary treatments alongside the provision of additional landscape features and open space will ensure net biodiversity gain and greater access to public open space;
 - Retention of the trees and mature boundary hedgerows, particularly on the frontage to Priors Leaze Lane will retain the rural setting;
 - The site is not constrained and does not rely upon significant infrastructure improvements in respect of delivery, however, it will ensure that where required contributions will be made to ensure sufficient capacity is maintained for local facilities.
- 4.4 An indicative site layout plan is produced at Appendix 3 which demonstrates the sites ability to accommodate a development of circa 30 dwellings, whilst delivering the above benefits.

5 Summary

- 5.1 Following review of the draft Neighbourhood Plan document, we raise three matters for consideration:

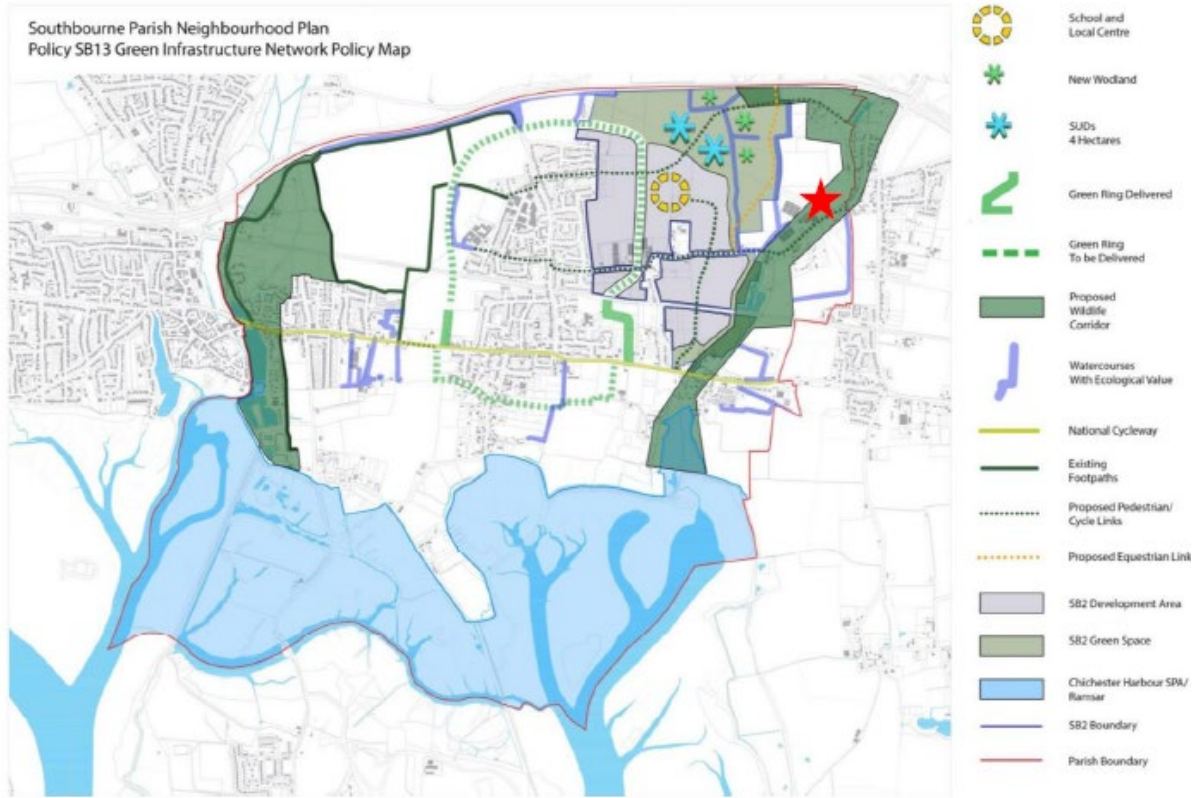
1. Extent of proposed wildlife corridor crossing out clients land should be reduced and provision made in policy to allow appropriate breaks for access to our clients land for agricultural or development purposes
 2. The Neighbourhood Plan should give further consideration to providing a mix of size sites to aid early housing delivery
 3. Our clients is well placed for inclusion as an allocation, should further housing numbers be required or following early review of the Neighbourhood Plan, in light of the likely adoption date of the Local Plan Review.
- 5.2 The Ecological Appraisal, which sits alongside this submission states that our clients land, including the area of the proposed ecological corridor is of ecological value and protected do not appear to be evident within the area.
- 5.3 Our clients accept that the conservation and protection of wildlife is incredibly important, and as such, any proposed development could include ecological measures to mitigate any harmful impact upon the sensitive nature of the locality.
- 5.4 Notwithstanding, a form of Wildlife Corridor could be accepted, but it should be significantly reduced to that currently detailed in Policy SB13 of the emerging Southbourne Neighbourhood Plan. The supporting policy map should therefore be amended and wording of the policy updated to reflect flexibility to allow appropriate breaks in this corridor.
- 5.5 We are hopeful that due to the demonstration of the fact that the site is of low ecological value, it is clear that this does not necessitate the extent of the land for inclusion within the Wildlife Corridor. Further, it has been shown that mitigation and compensation methods will be utilised, if an application if any application were to come forward, in order to enhance the value of the site, and protect those in the area.
- 5.6 Therefore, considering the fact that there are not demonstrable reasons for our sites inclusion within the Ham Brook Wildlife Corridor, and its resultant protection under SB13, the boundary of the corridor should be amended.

Appendix 1: Site Location Plans



Appendix 2: SB13 Policy Map

SB13 - Green Infrastructure Network Map



Appendix 3: Proposed Site Layout

