

## 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>
Full Name	Gemma & Mark Taylor
Address	[REDACTED]

Postcode	
Telephone	
Email	
Organisation (if applicable)	
Position (if applicable)	
Date	06/02/21

## PART B (1)

To which part of the document does your representation relate?

Paragraph Number	5.104	Policy Reference:	SB18 (&SB2)
------------------	-------	-------------------	-------------

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:**

### Community Feedback – Key Matter Priority 2 – 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.

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'. As it is not certain that more than 750 dwellings would be built, it can not be guaranteed that this bridge would be built and therefore the huge increase to traffic would have the opposite to 'improving road safety and reducing impact on residents from the road network', and make an already unsafe road even more dangerous, the Stantec report cites that at 500 additional dwellings there would be a significant increase in traffic and no proposals have been made as to how to mitigate the impact.

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 report does not address the issue of road safety issues caused by increased traffic levels and queues created as a result. These include air pollution, noise pollution of which neither have been taken into account and would have a detrimental impact on the local environment. There is also no consideration of the increase of traffic caused on alternate routes including Inlands road due to diversion of traffic either actively or passively from Stein road in the calculations thus bringing the results into question.

The report does not take into account nor provide any details as to how the assumptions around direction of traffic have been arrived at (this is questioned by Stantec themselves) and specifically there is no employment or demographic data to support the direction of travel.

The Neighbourhood plan is predicated upon being able to control the addition of new dwellings and manage funding in a more controlled manner to the betterment of all vs piecemeal developments. The plan does not detail in any way how funding will be secured from the developers to ensure that appropriate infrastructure is in place before thresholds are breached included in sighted 700 house number, there is no guarantee that the addition of a bridge will be funded prior to the creation of an issue identified by the Stantec report, how will this be resolved including ringfencing of funding.

Assumption that traffic will only travel in a south direction and requires clarification as to why only one way of traffic has been assumed? The assumptions used that journeys would present at less than 100% volume of allocated households holds no basis and requires further explanation. There is an assumption made that traffic would only present in one way 80/20% which has no basis and could lead to greatly underestimated volume of traffic being considered bringing into doubt the 750 homes use case level.

The case does not consider the impact of peak volumes being added to the current rush hour levels created by the primary school and nursery.

Nor does the report consider the impact of pollution generated specifically that of air pollution by standing traffic whilst waiting for the crossings.

The report does not consider both the increased traffic volume and air pollution impact created by traffic using the inlands road crossing as a result of shorter crossing times vs the Stein road crossing.

There is an unfounded assumption that the majority of traffic would head northwards rather than to the A259 this assumption is inherently flawed as it is based upon current position and density of properties on Inlands road and does not consider the new location of the proposed housing.

Significant increase in queue length (STANTEC report paragraph 5.4.9) at 500 dwellings but the model only considers action at 750 homes this is a discrepancy. And lengths increasing significantly at 1000 dwellings, in neither scenario has the diverted traffic been taken into account on the Inlands Road assessment and is ignored due to the lack of collection of real world data (report June 2019)

(Continue on separate sheet if necessary)

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

A full road safety audit conducted within a current period (the study was in 2019), and not just trip calculations, is required which takes into account the following items

Inadequacy of footpaths ( currently none north of the railway on Inlands Road)

pollution levels caused by waiting traffic at the level crossing gates to be considered inline with the 2019 Government's clean air strategy  
speed reduction measures  
inadequacy of passing places and blind spots around Inlands road & Priors Leaze Lane  
impact on drainage and road surface of increased traffic flow.

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

(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.

## PART B (2)

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	SB13
------------------	--	-------------------	------

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:

### Community Feedback - Key Matter Priority 3 – 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.

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 afforded minimal protection.

What improvements or modifications would you suggest?

The Southbourne Masterplan and the i-Transport Evidence Masterplan already appear to indicate a difference in concept of the green ring, and as such I/we cannot support the plan.

(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.

## PART B (3)

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	SB14
------------------	--	-------------------	------

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:**

### **Community Feedback - Key Matter Priority 4 – 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.

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.

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

Due to the looming expiry of Appendix D, and the omission of the plan area, I/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.

I/we cannot support this plan due to the environmental and wildlife devastation it will cause.

We urge CDC to consider alternative land options.

(Continue on separate sheet if necessary)

## PART B

To which part of the document does your representation relate?

Paragraph Number	5.28	Policy Reference:	SB2
------------------	------	-------------------	-----

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:

### Community Feedback - Key Matter Priority 1 – 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.*

(Continue on separate sheet if necessary)

**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.

The approval of the neighbourhood plan would require confirmation from Southern Water have agreed budgeted plans to increase both resilience and capacity within their network for the area.

**This investment is required before we can support the Neighbourhood Plan**

(Continue on separate sheet if necessary)