



Representation Form

Southbourne Modified Neighbourhood Plan 2014-2029 Submission Modified Plan (January 2023)

The Neighbourhood Planning (General) Regulations 2012 - Regulation 16

Southbourne Parish Council has prepared a modified Neighbourhood Plan. The modified 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 Modified Neighbourhood Plan 2014-2029 Submission Modified Plan (January 2023) 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 14 April 2023.

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 UK GDPR (General Data Protection Regulation) 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	Paul White
Address	c/o Smith Simmons 32 North Street Chichester W Sussex PO19 1LX

Postcode	PO191LX
Telephone	01243 850411
Email	paul@ss-p.co.uk
Organisation (if applicable)	
Position (if applicable)	
Date	03.04.23

PART B

To which part of the document does your representation relate?

Paragraph Number	See below	Policy Reference:	See below
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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:

Please see my comments below on the draft Southbourne Parish (Submission Modified Plan) 2014- 2029 (SPNP3). They are duly submitted by the due date of 14 April 2023. My comments are submitted in my capacity as a local resident of Farm Lane Nutbourne within the parish of Southbourne and a practicing chartered town planner based in Chichester.

Background

I commented on the first draft Review Plan in 2021 (SPNP2) before the Neighbourhood Plan Examiner concluded it should not proceed to referendum and was withdrawn. I did not support that plan because the allocation of land on the east side of the parish for 1250 dwellings in draft policy SB2 would have been premature to the confirmation of the proposed quantum of housing in the Chichester Local Plan Review. The proposed housing site also encroached significantly into an identified wildlife corridor and the Southbourne - Hambrook Local Gap shown in the Landscape Gap Assessment forming part of the evidence base for the Local Plan and Neighbourhood Plan.

I commented on the Pre Submission Modified Neighbourhood Plan (SPNP3) dated October 2022 but they have not led to further changes in this Submission version Plan. I am therefore pleased to re-state them for the attention of the Examiner. My comments are as follows:

Basic Considerations for Neighbourhood Plan Preparation

For the Southbourne Neighbourhood Plan to progress, it has to meet the Basic Conditions for plan preparation.

Paragraph 8(2) of Schedule 4B of the Town and Country Planning 1990 Act sets out the basic conditions a Neighbourhood Plan must meet and which an examiner must consider before it can go to referendum. The statutory tests are:

- Having regard to national policies and advice, whether it is appropriate for the Neighbourhood Plan to be made.
- Having special regard to the desirability of preserving any listed building or its setting or the character or appearance of any Conservation Area.
- Contribute to the achievement of sustainable development.
- Be in general conformity with the strategic policies of the development plan for the area.
- Be compatible with the European Union (EU) and European convention on human rights (ECHR) obligations.

National policy in the Planning Practice Guidance (PPG) Paragraph: 009 Reference ID: 41-009-20190509 and basic condition 4 above both say a draft neighbourhood plan must be in general conformity with the strategic policies of the development plan in force. In addition, the PPG makes clear Neighbourhood plans are not tested against the policies in an emerging local plan.

It is noted from the foreword for SPNP3 that it does not allocate land for housing because the housing target for Southbourne parish in the overarching strategic Chichester Local Plan Review has not yet been agreed or been subject to any testing. The draft SPNP3 has therefore properly taken account of national policy and has been prepared in accordance with basic conditions 1 and 4 above.

Moving ahead of the Local plan Review process and the housing numbers allocated to the parish was flawed last time. The current Plan remedies that and the approach is supported.

The Evidence Base for the Neighbourhood Plan

The evidence base for the new SPNP3 includes the Landscape Gap Assessment of Terra Firma (May 2019). This has identified 'gaps' between settlements located along the A259 in the East-West Corridor that should be protected from

development to help maintain the identity of individual settlements; and considered the impact of potential development on designated landscapes including the south downs national park (SDNP) and the Chichester Harbour Area of Outstanding Natural Beauty (AONB).

Since the last Pre Submission Modified Neighbourhood Plan was produced, the importance of countryside gaps has been recognised in the emerging Submission Local Plan policy NE3 of Chichester District Council.

Local Plan Policy NE3 has been informed by the Landscape Assessment and is titled Landscape Gaps Between Settlements. Lower case policy text at paragraph 4.10 of the Local Plan recognises that in many parts of the plan area villages are located relatively close together. It says this is particularly the case along the A259 towards the west of Chichester. This is therefore a policy that directly applies to Southbourne.

It says retaining the separate identity of each settlement is recognised as a key consideration of any development strategy and this approach is highly valued by local people. Landscape gaps can help guide where new development should be built and ensure the maintenance of open land between settlements. The policy NE3 therefore states:

In order to prevent coalescence of built-up areas, maintain the individual identity of settlements, actual or perceived, and ensure the integrity of predominantly open and undeveloped land between settlements is not undermined, the generally open and undeveloped nature of gaps between settlements will be protected. The precise boundaries of gaps will be defined in either a Site Allocations DPD or through Neighbourhood Plans.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

The Inset Maps of SPNP3

Neighbourhood Plan policy SB13 refers to Wildlife Corridors and properly pays regard to the corresponding wildlife corridor policy NE4 of the emerging Local Plan. The wildlife corridors are shown on the relevant inset plans of the Neighbourhood Plan, and this is supported.

Local Plan policy NE3 is a different policy which deals with landscape gaps between settlements but there is no corresponding policy in the Neighbourhood Plan.

A new Neighborhood Plan policy should therefore be included which deals with landscape gaps in accordance with Local Plan policy NE3. The identified landscape gaps in the parish should be identified on the Neighbourhood Plan Inset plans. This approach would comply with paragraph 13 of the NPPF which states that Neighbourhood Plans should support spatial development strategies in Local Plans and should shape and direct development outside of these strategic policies.

The gaps identified in the Landscape Gap Assessment within Southbourne Parish are Gap 9 - Hermitage and Southbourne and Gap 10 - Southbourne and Hambrook. Both gaps should therefore be shown on the Policy Inset Maps 1 and 2 of SPNP3. The Gaps along with the other environmental constraints shown on the Inset Maps should inform potential site selection in the next Neighbourhood Plan Review.

This amendment would ensure the Neighbourhood Plan better complies with the basic conditions tests 1 and 4 as the Plan would have regard to national policy in the NPPF and be more in conformity with the District Development Plan.

SPNP3 Policy Comments

Policy SB2 should be deleted. It should not allocate land north of Cooks Lane as the site has outline consent including access (18/03145) and approval for the remaining reserved matters - appearance, landscaping, layout, and scale in August 2022 (22/00157). The consented site could be included within the settlement boundary in SB1, and the applications referred to in the lower case policy wording. The requirements for the site will be controlled by planning condition in the outline and reserved matters consents.

As there are no new housing allocations, paragraph 5.13 of the Neighbourhood Plan should be deleted.

Unless policy SB3 has been informed by a specific parish local housing need study, it should be less prescriptive in connection with housing mix especially as housing mix considerations will be set out in the overarching Local Plan policy H5.

Policy SB13(E) refers to associated wetland and woodland planting requirements for gross development sites of 2 ha or more. If the intention of the policy is to recognise windfall development opportunities coming forward outside a settlement boundary the policy should confirm this.

Policy SB20 parts (B) and (C) refer to development adjacent to water courses. They could be combined in a single new test and could cross reference the separate requirements of policies SB13 and SB14.

(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.

Matthew Burle

From: Paul White <Paul@ss-p.co.uk>
Sent: 03 April 2023 10:27
To: Neighbourhood Planning
Subject: [EXTERNAL] Southbourne Neighbourhood Plan Submission Comments
Attachments: Submission 2023 Form with Comments.pdf; Submission 2023 Form with Comments.docx

This Message originated outside your organization.

FAO Neighbourhood Planning @ CDC

Please find attached my comments on the Submission version Southbourne Neighbourhood Plan in pdf and word doc formats for the attention of the Plan Examiner.

Kind regards

Paul White BA Hons DIPTP MRTPI

Director of Planning [01243 850 411](tel:01243850411)



**Smith
Simmons
& Partners**

Planning, Architecture & Land Promotion

32 North St, Chichester, PO19 1LX

Office: [01243 850 411](tel:01243850411)

Website: www.ss-p.co.uk

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