

## Matthew Burle

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**Subject:** Southbourne Parish Neighbourhood Plan - Submission Modified Plan 2014 – 2029 Consultation  
**Attachments:** 27783 A5 Southbourne NP Reps FINAL.pdf

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**From:** Oli Haydon <Oli.Haydon@bartonwillmore.co.uk>  
**Sent:** 11 April 2023 16:31  
**To:** Neighbourhood Planning <neighbourhoodplanning@chichester.gov.uk>  
**Cc:** Robin Shepherd <Robin.Shepherd@bartonwillmore.co.uk>  
**Subject:** [EXTERNAL] Southbourne Parish Neighbourhood Plan - Submission Modified Plan 2014 – 2029 Consultation

**This Message originated outside your organization.**

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Good afternoon,  
Please find attached our representations to the Southbourne Parish Neighbourhood Plan consultation.  
I would greatly appreciate if you could confirm receipt.  
Many thanks  
Oli

**Oli Haydon**  
Senior Planner

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## 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](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 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.

<b>PART A</b>	<b>Your Details</b>
<b>Full Name</b>	Robin Shepherd
<b>Address</b>	The White Building, 1 4 Cumberland Place, Southampton
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<b>Organisation (if applicable)</b>	Barton Willmore, now Stantec
<b>Position (if applicable)</b>	Planning Director
<b>Date</b>	11 April 2023

## **PART B**

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

Paragraph Number	Whole Plan Comment	Policy Reference:	Whole Plan Comment

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support  Support with modifications  Oppose  Have  
 Comments

<b>Please give details of your reasons for support/opposition, or make other comments here:</b>
<p>Please find attached our full representations, attached overleaf, to the Southbourne Neighbourhood Plan Regulation 16 Consultation.</p> <p style="text-align: right;">(Continue on separate sheet if necessary)</p>

<b>What improvements or modifications would you suggest?</b>
<p>Please find attached our full representations, attached overleaf, to the Southbourne Neighbourhood Plan Regulation 16 Consultation.</p> <p style="text-align: right;">(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**  
**2014-2029**  
**REGULATION 16 CONSULTATION**  
**REPRESENTATIONS**

Land East of Southbourne  
On behalf of Wates Developments  
and Seaward Properties

April 2023

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**SOUTHBOURNE NEIGHBOURHOOD PLAN 2014-2029  
REGULATION 16 CONSULTATION REPRESENTATIONS**

**On behalf of Wates Developments and Seaward Properties**

<b>Project Ref:</b>	27783/A5/P3/OH	27783/A5/P3/OH
<b>Status:</b>	Draft	FINAL
<b>Issue/Rev:</b>	1	3
<b>Date:</b>	04 April 2023	11 April 2023
<b>Prepared by:</b>	OH	OH
<b>Checked by:</b>	RS	RS
<b>Authorised by:</b>	RS	RS

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Date: April 2023

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- 2.0 Summary and Conclusion

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## **1.0 RESPONSE TO THE REGULATION 16 CONSULTATION & EVIDENCE BASE**

- 1.1 These representations have been prepared by Barton Willmore on behalf of Wates Developments Ltd and Seaward Properties (hereby referred to as 'the Consortium'), who are jointly promoting Land East of Southbourne ('the site'), the settlement being proposed for a mixed-use allocation under Chichester District Council's (CDC) local plan draft policies H2 and A13.
- 1.2 The first Neighbourhood Plan (SPNP1) allocated land for 350 homes in Southbourne Parish for the years 2014-2029, in line with the CDC Local Plan which covered the same period, and which was also adopted in 2015. CDC's LP Review (Preferred Approach – 2018) proposed a further 1250 dwellings in Southbourne Parish and SPC undertook a review of its NP accordingly (SPNP2).
- 1.3 The land east of Southbourne formed a draft mixed-use allocation including 1,250 homes in SPNP2. Importantly, the Examiner, in his report (early in 2022) into the submitted version of the SPNP2 did not conclude that the proposed allocation was unsustainable for growth, but simply that the timing of the Neighbourhood Plan was too early against the emerging Local Plan timetable, which had unfortunately been delayed, to facilitate the proposed allocation against the requirement of the Basic Conditions [Paragraph 8(2) Schedule 4B Town and Country Planning Act 1990] to be in general conformity with the development plan. The Examiner therefore concluded that SPNP2 could not be based on the LP review because CDC had not been able to progress it sufficiently.
- 1.4 The draft plan subject to this consultation is therefore the third Neighbourhood Plan (SPNP3) prepared for Southbourne by the Parish Council. SPNP3 is understood to be an interim measure until such time as the reviewed wider CDC Local Plan comes into force. In order to resist speculative development in the intervening period up to the adoption of the CDC Local Plan, SPC intends to submit a revised NP based on the LP 2015 so that there is at least a temporary NP in place for 2 years.
- 1.5 As stated above, the new NP takes Southbourne's 2015 NP (SPNP1) as its starting point. It does not allocate new land for housing, in an attempt to comply with the emerging LP Review, so the policy promoting a large area for development to the east of the village of Southbourne has effectively been removed. This zero-allocation strategy has been adopted in order to protect the community from speculative allocations (and in direct response to the recommendations of the Examiner into SPNP2).
- 1.6 The Chichester Local Plan is in an advanced stage of preparation. The Regulation 19 statutory consultation took place in February/March 2023 and its submission to the

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Secretary of State is due to happen in Summer 2023, with adoption by Summer 2024. The emerging policy H2 allocates a minimum of 1,050 dwellings at Southbourne with the allocation of the site to be identified through either the neighbourhood planning process or subsequent Site Allocation DPD.

1.7 In light of the above emerging policy context, if a new NP is to be prepared to inform which areas of Southbourne will be subject to the emerging LP policy regarding the “broad location of development”, it will be this neighbourhood planning group’s fourth attempt at doing so, which would need to commence very soon after the scheduled timescale for adoption of SPNP3 (Winter 2023). It is, however, a risk that this version of the NP will be examined after the Examination of the Local Plan. In such circumstances, assuming the proposed requirement for an allocation at Southbourne remains, it could mean that the SPNP3 fails at its Examination by virtue of again not being in general conformity with the development plan (as per the Basic Conditions). Whilst we appreciate that this community has gone far beyond what many others have in seeking to plan for their community, we remain confident that the NPG will be proactive in their efforts to secure a comprehensively masterplanned residential scheme in Southbourne. If this NP is progressed to Examination, the NPG will therefore need to be satisfied that it would need to undertake an immediate further review to plan for the proposed allocation.

1.8 Whereas the draft NP must be in general conformity with the strategic policies of the Adopted CDC Local Plan, at a practical level the Parish Council need to make sure that emerging NP policies are not in conflict with the local plan's policies as soon as they are adopted. Where there is a conflict between policies in a development plan, the approach to be taken is set out in primary legislation (section 38 (5) of the Planning and Compulsory Purchase Act). Principally, that the decision-maker should favour the more recently adopted policies of the development plan. Guidance on NP production in this regard is provided in the PPG, which states (ref. PPG, Paragraph: 009 Reference ID: 41-009-20190509),

*'A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.'*



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*Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:*

- *the emerging neighbourhood plan*
- *the emerging local plan (or spatial development strategy)*
- *the adopted development plan*

*with appropriate regard to national policy and guidance.’ (PPG, Paragraph: 009 Reference ID: 41-009-20190509)*

- 1.9 It is therefore recommended that the draft NP is amended to allow for the incorporation of a more positive policy approach towards meeting the up-to date housing needs of the Parish that will endure beyond the adoption of the emerging CDC Local Plan.
- 1.10 The Consortium for East of Southbourne has been working together to promote the land east of Southbourne and have previously committed to working with the Neighbourhood Plan Group (NPG) and wider community to develop an agreed masterplan and phasing approach to comprehensively deliver housing, community facilities, employment and green infrastructure as guided by the emerging local plan. We are therefore pleased to see development being directed in a sustainable manner towards Southbourne in the emerging local plan and believe we are best suited to provide this growth through a sensitively designed eastern extension to the town, a pattern and direction of growth supported by previous NPGs.
- 1.11 Previous representations were made to the Regulation 14 consultation in December 2022. Some responses expressed concerns about the state of the infrastructure serving the existing community and the impact of further development. The NP continues to promote the growth of the village through effective planning and acknowledges that it is the responsibility of investment by ‘third parties’ to upgrade the village infrastructure, increase healthcare and education provision and ease congestion. Residents were overwhelmingly supportive of the direction and aim of the NP and as such minor changes were proposed between this version and the previous Regulation 14 draft. We have appended the previous representations of the consortium, as the points raised remain valid.
- 1.12 A Vision document, revising the proposals to take account of changes in policy requirements and to demonstrate how the proposals would create a highly attractive

and sustainable community, providing an extensive range of community facilities, Green infrastructure, biodiversity, the Green Ring and supporting physical infrastructure, acting as an extension and integrated part of Southbourne, will be submitted to the NPG for discussion over the forthcoming months.

1.13 For the purposes of this representation, any updated evidence base will be discussed along with any changes made to the NP as a result of consultation responses.

1.14 Set out below are comments on the detailed policies within the draft NP, where amended.

Draft Policy	Response
<p>Policy SB1: Development within and outside the settlement boundaries</p>	<p>Reference to 'avoiding actual or perceived coalescence between settlements' has been removed. The consortiums approach allows for the masterplan to be designed to best protect the existing settlement of Southbourne from any coalescence with surrounding hamlets. The location of development to the east of the village and the inclusion of the Green Ring is the most appropriate and effective way to protect the village's visual separation and identity.</p> <p>In terms of the assessment of a scheme to the west of Southbourne, the Sustainability Appraisal supporting the NP rightly acknowledges the lack of the same level of masterplanning effort. A scheme of a similar size to that proposed in the emerging plan would highly likely lead to a consolidation of the village of Southbourne and Emsworth due to the limited dimensions of the land and constraints from the A27 to the north. It is also worth noting that Havant BC is proposing to allocate land to the north of Emsworth for a large-scale allocation, which would need to be considered in the planning of an allocation at Southbourne so as to avoid any potential issues of coalescence.</p> <p>The SA also advises that a split of growth to the east and to the west would potentially result in sub-optimal outcomes in terms of securing community infrastructure benefits / planning gain to the benefit of the village as a whole, a key element of the scheme to the east.</p>
<p>SB3: Local Housing Needs</p>	<p>Reference to the provision of dwellings for 'First Homes' and social rent have been included alongside the balanced housing mix. The proposed scheme east of Southbourne would present a policy compliant mix of housing types and tenures (in line with the emerging CDC local plan).</p>

	<p>We would also look to work collaboratively with the local community to identify the appropriate location and phasing for self and/or custom build plots within the Masterplan to ensure the plots come forward in a suitable location that has been considered alongside the wider masterplanning exercise.</p>
<p>SB13: Green and Blue Infrastructure Network</p>	<p>The policy more robustly secures the growth of the 'green ring', to include wildlife corridors and waterbodies of ecological value. The proposed scheme to the east of Southbourne would be capable of delivering a significant portion of the Green Ring. The Consortium is also supportive of a central feature through the site and the approach to align the Green Ring with the north-south public right of way which connects with the green infrastructure on the eastern edge of the neighbouring Cooks Lane development. This approach would allow the green ring to be cohesive with the neighbouring green infrastructure, whilst also maintaining the public rights of way, in conformity with paragraph 98 of the NPPF. Whilst this central 'Inner' Green Ring could include play, gym trail, walking and cycling, benches and a variety of greenspace (amenity and natural), which would create a varied and engaging corridor, we would work wish to with the Neighbourhood Plan Group to identify the best mechanism to position sports and allotments through a masterplanned approach.</p>
<p>SB21: Sustainable Travel</p>	<p>The policy now seeks to apply the principles of the Sustainable Accessibility and Mobility Framework tool (prepared by the RTPPI) within the policy wording itself.</p> <p>We support the use of this framework to help schemes reduce trips and increase those trips taken by active, public and shared transport.</p> <p>We note that this may conflict with the emerging local plan's shift away from 'predict and provide' approach to recommending mitigation based on forecast growth, to an approach of 'monitor and manage', based on identifying a package of potential highway improvements which alongside schemes identified through the development management process, may be implemented following a monitoring process that will monitor the actual demand on the network and the requirement for the schemes.</p> <p>We consider that the NP should acknowledge the shift towards 'vision and validate' in transport planning. If such an approach was required,</p>

the Consortium would welcome discussions with the NPG on how to best realise the place that the community and District Council wants to create at Southbourne, and to target sustainable transport measures, alongside a carefully planned new community, that minimises travel needs and provides genuine sustainable options for movement. Such an approach would need to reimagine the hierarchy of transport users, prioritising pedestrians first, followed by cyclists, public transport, specialist service vehicles and finally other motor traffic. The scheme would prioritise support and encouragement for sustainable travel in line with this new hierarchy whilst now linking transport intrinsically with masterplanning, carbon reduction, air quality, health and lifestyle and biodiversity, instead of seeing it as a standalone consideration. We would therefore recommend the NP encourages such an ambitious approach within SB21, if of course the 'vision and validate' approach is to be proposed.

The land east of Southbourne will deliver a comprehensive development that also secures benefits for the existing community, including:

- Delivery of a significant portion of the Green Ring, in both a central location and also an enhanced, longer walking route around the edge of the allocation. This has the benefit of creating a meaningful gap between settlements that is focused on the delivery of environmental enhancements and a wildlife corridor, whilst also offering alternative longer route for walking/recreation, reducing pressure on the Chichester Harbour SPA.
- A connected integrated community that delivers sustainable transport improvements and alternatives for the whole of Southbourne.
- A focus on connectivity through the green ring and connecting green corridors that focus movement on walking and cycling, rather than vehicular travel.
- A central community hub that can deliver a new 2FE primary school, a community building, small scale retail and an enterprise hub to support homeworking, shared office space and start-ups.

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## **Sustainability Appraisal (SA)**

- 1.15 We echo the conclusions of the Sustainability Assessment with regards to Option B (Growth to the west of Southbourne). Namely the erosion of the green gap between the settlements of Southbourne and Westbourne, resulting in an expansion of the settlement boundary to the northwest and gap between Southbourne and Hermitage identified through the Chichester District Council Landscape Gap Assessment as contributing to the open setting of the AONB, which is essential in preventing the coalescence of the two settlements and maintaining their separate identities. In terms of the assessment of a scheme to the west of Southbourne, the SA rightly acknowledges the lack of the same level of masterplanning effort. In terms of community building, higher growth at Southbourne feasibly leads to related benefits over-and-above those already discussed within the SA. We feel that the SA doesn't go far enough to explore the potential for genuine community building and the more holistic side of the proposed strategic developments. Development east of Southbourne would contribute a significant benefit to the community and village through the delivery of a community hub, primary school and shared, co-working office space which could support both new and existing residents, therefore having benefit for the village as a whole. The central location of this facility, which could be delivered with relationship to the Green Ring, would ensure the accessibility for all within the community.
- 1.16 Our well-advanced masterplanning approach to the site east of Southbourne has taken into account the findings of the SA, in particular with regards to the need to protect the settlement gap between Hambrook and Southbourne and the sensitivity of the heritage assets which lie in proximity to the site. Option C (Growth to the east of Southbourne) was deemed the favoured approach of the NPG as it would bring an 'exemplary' scheme with a central focus to the village, the next phase of the 'Green Ring' as a central defining feature serving the new primary school, multifunctional community hub and other associated uses. An updated Vision document is to be prepared to take account of changes in policy requirements and to demonstrate how the proposals would create a highly attractive and sustainable community, we envisage that this document will be submitted to the NPG for discussion over the forthcoming months.
- 1.17 The updated screening report for the NP (Jan 2023) did not raise any additional points of discussion.

## **2.0 CONCLUSION AND SUMMARY**

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- 2.1 We commend the Southbourne Neighbourhood Planning Group on their resilience and hard work in the preparation of this draft plan. We echo the frustrations at the findings of the Examiner in advising that the plan be withdrawn to allow it to align better with the emerging District Plan. We feel that both the emerging LP and NP need to align in their preferred strategy for Southbourne. The emerging LP references a broad location of development, falling back on a subsequent DPD or NP to add detail and specificity to the growth strategy of the village. As CDC have made no assurance of the timescales of this follow-up DPD, we are concerned that a broad location of development could be allocated to Southbourne, with no mechanism for its delivery and the delivery of the much-needed infrastructure improvements for the village.
- 2.2 We have made representations to CDC to remove the reference to a broad location of development and instead to include a specific location within Southbourne, to align with all other allocations within the LP and to avoid a significant risk to the delivery of housing that may arise if there are delays in the adoption of the subsequent DPD or Neighbourhood Plan. We agree that the long-term assessment and findings of the Neighbourhood Plan group and the plan Examiner remain sound and should be respected and reflected in a specific and precise housing allocation within the LP to deliver much needed infrastructure and community improvements for the village.
- 2.3 As previously raised, there is a risk that this version of the NP will be examined after the Examination of the Local Plan. In such circumstances, assuming the proposed requirement for an allocation at Southbourne remains, it could mean that the SPNP3 fails at its Examination by virtue of again not being in general conformity with the development plan (as per the Basic Conditions). Whilst we appreciate that this community has gone far beyond what many others have in seeking to plan for their community, we remain confident that the NPG will be proactive in their efforts to secure a comprehensively masterplanned residential scheme in Southbourne. If this NP is progressed to Examination, the NPG will therefore need to be satisfied that it would need to undertake an immediate further review to plan for the proposed allocation.
- 2.4 In the event that our recommendations to the LP are not taken, we hope that the NPG continue their long-lasting aspirations for the village by delivering a follow-up plan to allocate the Consortium's land east of Southbourne to allow these community benefits to be brought forward. We have a commitment to working collaboratively with the neighbourhood planning group and local community to co-create an extension to Southbourne that residents can be proud of, one that provides an extensive range of community facilities, new green spaces, biodiversity and wildlife enhancement, the

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growth and protection of the Green Ring and supporting physical infrastructure to constitute a fully integrated part of the village.