**ITEM 1**

**Policy A13.9 Wildlife Corridors (Nutbourne to Hambrook Strategic Wildlife Corridor)**

**SUPPORT OR OBJECT?**

**Object**

**OBJECT – Legal compliance/Soundness/Duty to cooperate – YES OR NO TO EACH**

**Legal compliance - no**

**Soundness - yes**

**Duty to cooperate - no**

**WHY HAS TEST NOT BEEN MET? (100 words)**

**SUMMARY - At present the Wildlife Corridor area shown around the Ham Brook differs between the Local Plan and the Neighbourhood Plan. The Wildlife Corridor should be larger as shown in the Southbourne Parish Neighbourhood Plan, Submission Modified Plan 2014 – 2029 Ham Brook Strategic Wildlife Corridor Map (Plan D, page 47). The results of surveys commissioned by the District Council confirm this, as do the more thorough surveys commissioned by the Parish Council and validated by the Sussex Biodiversity Record Centre.**

**It is not clear whether the Map prepared by the District Council is definitive, or a strategic guideline. The Local Plan (Policy NE4, Map NE4a and para. 4.16) appears to confirm that the boundaries are definitive. However, District Council officers in discussion with officers of the South Downs National Park (Duty to Cooperate Statement of Compliance Jan 2023, page 38) it appears that that it was agreed that details would be agreed through Neighbourhood Plans. This conflict requires rectification.**

**DETAILS - The Ham Brook Wildlife Corridor was included in the Local Plan following strong representations from the Southbourne Parish Council, Hambrook and Chidham Parish Council, and members of the public. Southbourne Parish Council organised surveys to support its inclusion but the area selected by the District Council was not as large as was considered justified by the Parish Council.**

**The evidence commissioned by the District Council (Wildlife Corridors Technical Consultation Document, July 2021) shows contributory branches of the Ham Brook Chalk Stream to the west (Figure 1) which have not been included in the strategic corridor. It is not clear why. Chalk streams are rare and worthy of protection. Prolific evidence of water voles was discovered during the Parish Council survey of these side-streams.**

**The District Council bat survey had only two recording points, but despite this, bat activity was recorded to the west and north west of the currently proposed corridor (Wildlife Corridors Technical Consultation Document, July 2021 – Figure 2). Bat surveys organised and commissioned by the Parish Council were more wide ranging and fully support the identification of a wider area as shown in the Neighbourhood Plan.**

**At a meeting between officers of the District Council and the South Downs National Park (SDNP), SDNP officers “queried whether they [Wildlife Corridors] are substantial enough to perform intended function” (Duty to Cooperate Statement of Compliance Jan 2023, page37). This would appear to support the case for a larger and wider Corridor along the Ham Brook.**

**Conclusion - The Wildlife corridor should be extended to include the area shown in the Neighbourhood Plan on the basis of the evidence secured by both District and Parish Councils. Confirmation is required about whether boundaries are defined in the Local Plan or in Neighbourhood Plans.**

**WHAT CHANGES TO PLAN, IDEALLY ALTERNATIVE WORDING**

**Policy NE4 should state which plans confirm the boundaries of the Wildlife Corridors. Local Plan Map 4a needs amending to show a larger area for the Nutbourne to Hambrook Wildlife Corridor.**

**SUPPORTING DOCUMENTS (up to 4)**

1. **Southbourne Parish Neighbourhood Plan, Submission Modified Plan 2014 – 2029 Ham Brook Strategic Wildlife Corridor Map (Plan D, page 47).**
2. **Local Plan (Policy NE4, Map NE4a and para. 4.16)**
3. **Wildlife Corridors Technical Consultation Document, July 2021 (Chichester District Council)**
4. **Southbourne Parish Neighbourhood Plan, Submission Modified Plan 2014 – 2029, Supporting Evidence NP3 SB14 EV1 Biodiversity.**
5. **Southbourne Parish Neighbourhood Plan, Submission Modified Plan 2014 – 2029, Supporting Evidence, NP3 SB14 Biodiversity Plan 8**
6. **Southbourne Parish Neighbourhood Plan, Submission Modified Plan 2014 – 2029, Supporting Evidence, NP3 SB14 Biodiversity Plan 10**
7. **Sussex Biodiversity Records Centre 2022**
8. **Duty to Cooperate Statement of Compliance Jan 2023**

**If CHANGE SOUGHT, DO YOU WISH TO PARTICIPATE IN HEARING? IF YES, WHY?**

**Yes because conflict between the Local and Neighbourhood Plan needs to be debated and resolved.**

**WAS THIS POINT RAISED BY YOU IN PREVIOUS CONSULTATIONS?**

**If yes – “Issues and Options” or “Preferred Approach” IF NO, WHY NOT?**

**Yes “Issues and Options” and “Preferred Approach”**

**ITEM 2**

**Policy A13/2 Southbourne – Gypsy and Traveller Pitches, Travelling Showmen Plots**

**SUPPORT OR OBJECT?**

**Object**

**OBJECT**

**Legal compliance - yes**

**Soundness - yes**

**Duty to cooperate - no**

**WHY HAS TEST NOT BEEN MET?**

**Legal Compliance – The Parish Council was not consulted about this part of Policy A13 or Policies H11, H12, H13 or H14 until now. Parish Councils are listed as one of the bodies the District Council must consult under the Town and Country Planning (Local Planning) (England) Regulations 2012. (See also Para. 3.4 of the Local Plan Statement of Community Involvement).**

**Soundness – The proposed intensification of the site at Sunrise in Southbourne is not deliverable (Policy H12 – Proposed 1 additional pitch at Sunrise as shown in Local Plan Appendix I).**

**Duty to cooperate – no**

**WHAT CHANGES TO PLAN, IDEALLY ALTERNATIVE WORDING**

**H11, H13, H14 - It has not been possible to consult the community in Southbourne to obtain a view on these policies in the time allotted. This places the Parish Council in a difficult position. However, 12 new pitches and 12 new plots is a considerable number to accommodate in addition to those already occupied within the parish and therefore it is considered appropriate to raise objection unless the District Council can provide sufficient assurances about the location and proposed management of these sites.**

**H12 – The site identified as Sunrise in the Local Plan is already fully occupied. This includes the controversial encroachment, reinforced by two meter high boundary fencing, over a significant length of a Public Right of Way (Footpath 212), which now follows an unpleasant confined route adjacent to the correct route. In addition, an unauthorised park home dwelling has been recently located over the original route of the Public Right of Way. There is no room for a further pitch. It appears that the District Council is attempting to use this proposal to regularise unauthorised development, which is not acceptable. It is strongly recommended that the Inspector visits this site and that the proposal at Sunrise is deleted from the Local Plan.**

**SUPPORTING DOCUMENTS (up to 4)**

**0**

**If CHANGE SOUGHT, DO YOU WISH TO PARTICIPATE IN HEARING? IF YES, WHY?**

**Yes. This is a controversial matter of local concern.**

**WAS THIS POINT RAISED BY YOU IN PREVIOUS CONSULTATIONS?**

**If yes – “Issues and Options” or “Preferred Approach” IF NO, WHY NOT?**

**No – This is the first time these proposals have been presented.**

**ITEM 3**

**Southbourne - Policy A13.1 Broad Location for Development and Housing Numbers**

**SUPPORT OR OBJECT?**

**Object**

**OBJECT – Legal compliance/Soundness/Duty to cooperate – YES OR NO TO EACH**

**Legal compliance - no**

**Soundness - yes**

**Duty to Cooperate – no**

**WHY HAS TEST NOT BEEN MET? (100 words)**

**The evidence explaining why there has been a reduction from 1250 to 1050 dwellings as set out in the District Council “Southbourne Broad Location for Development Background Paper (Jan 2023)” is incorrect. Should the housing numbers for the Local Plan be increased across the parishes for any reason, it is important that they are not increased in Southbourne. This is because it has been acknowledged by the District Council that 1050 additional dwellings are the most that should be accommodated in the period to 2039. The Parish Council considers that more than 1050 dwellings would be likely to compromise other policies in the Local Plan, probably give rise to market saturation locally and also pose problems integrating new residents with those already living in the village.**

**WHAT CHANGES TO PLAN, IDEALLY ALTERNATIVE WORDING**

**SUMMARY Para. 2.4 is correct, but para. 2.5 states that the number has “been reduced to 1050 dwellings to reflect the proportionate reduction in housing numbers across the parishes in the east west corridor as a consequence of the limit on numbers in the southern plan area.” This should be amended to read “…………..been reduced to 1050 dwellings due to an exception made by the District Council to take account of a planning permission for 199 dwellings at Cooks Lane granted in 2020.”**

**DETAILS The 1250 number was reduced by the District Council to take account of an appeal which allowed 199 dwellings on a site in Cooks Lane, Southbourne on 2nd March 2020. (199 dwellings App. No. 18/03/03145/OUT). A letter from the District Council to the Parish Council dated 26th November 2020 stated “……………the revised distribution we are testing includes a proposed level of development of 1,250 dwellings for your parish. The working assumption therefore is that your parish council will bring forward a neighbourhood plan identifying sites (of five or more dwellings) to deliver this level of development for the period 2019-2037. Typically, any sites or schemes which already have planning permission, allocated in the existing Local Plan or a “made” Neighbourhood Plan as at 1 April 2020 would not count towards this figure. Nor would development on sites of less than five dwellings, as they count towards the “windfall” figure for the Local Plan Review and so cannot be double counted. The exception to this is the 199 dwellings which have planning permission on the Cook’s Lane site, which I can confirm are envisaged will count towards the 1,250 total.” (underlined here for ease of reference)**

**SUPPORTING DOCUMENTS (up to 4)**

1. **Southbourne Broad Location for Development, Background Paper January 2023**
2. **Letter from Chichester District Council to Southbourne Parish Council dated 26th November 2020.**

**If CHANGE SOUGHT, DO YOU WISH TO PARTICIPATE IN HEARING? IF YES, WHY?**

**Yes because Southbourne is a key contributor to the Local Plan housing proposals, bur local circumstances need to be explained and fully understood.**

**WAS THIS POINT RAISED BY YOU IN PREVIOUS CONSULTATIONS?**

**If yes – “Issues and Options” or “Preferred Approach” IF NO, WHY NOT?**

**No because previous consultations pre-dated these circumstances and the District Council’s consequent commitment to the 1050 increase.**