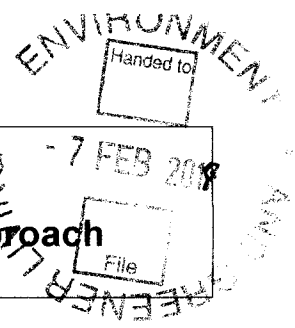




Representation Form

Local Plan Review: Preferred Approach Consultation



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- Print this form and post it to us at: Planning Policy Team, Chichester District Council, East Pallant House, 1 East Pallant, Chichester, West Sussex, PO19 1TY

How to use this form

Please complete Part A in full. Please note anonymous comments cannot be accepted, a full address including postcode must be provided.

Please complete Part B overleaf, using a new form for each separate policy or paragraph that you wish to comment on. Please identify which paragraph your comment relates to by completing the appropriate box.

For more information, or if you need assistance completing this form, please contact the Planning Policy Team by email at planningpolicy@chichester.gov.uk or telephone 01243 785166.

PART A	Your Details	Agent's Details (if applicable ¹)
Full Name	Sue & Geoff Talbot	-
Address	<div style="background-color: black; width: 100px; height: 100px;"></div>	-
Postcode		-
Telephone		-
Email		-
Organisation (if applicable)	Both members of Southbourne Parish Neighbourhood Plan Steering Group	-
Position (if applicable)	Volunteers	-

Is this the official view of the organisation named above? Yes ☐

No ☒

¹ Where provided, we will use Agent's details as the primary contact.

PART B

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<http://www.chichester.gov.uk/dataprotectionandfreedomofinformation>.

To which part of the document does your representation relate?

Page/ Paragraph Number:	Page 127 - 129 Paras 6.86 – 6.90	Policy Reference:	AL13 : 4 Southbourne Parish
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☒ X

Have Comments ☐

Enter your full representation here giving details of your reasons for support/objection:

A new road bridge over the railway line in Southbourne is required if 1250 new dwellings are to be accommodated satisfactorily. The provision of infrastructure at the right time is essential. Sufficient land for 1250 dwellings is unlikely to be found anywhere other than north of the railway line and this would make existing congestion at the Stein Road level crossing considerably worse. The construction of 1250 dwellings at a completion rate of some 80 dwellings a year would lead to continual building for the next 16 years. The associated construction traffic would make the situation even worse. In these circumstances the northbound queues could back-up onto the A259. A separate footbridge on the east side of the village is also required as is the closure of existing at-level and uncontrolled pedestrian routes across the railway line.

Policy AL 13 (4) only proposes "Opportunities as they arise to improve the situation relating to the various existing or planned railway crossings". This is too weak. The policy should require the provision of these new rail crossings to support the proposals set out in the current Neighbourhood Plan.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

Policy AL13 (4) should be amended to read "Improvements to the situation relating to the various existing and planned railway crossings will be required as part of the phased development"

(Continue on separate sheet if necessary)

Declaration

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Name (print):	Sue and Geoff Talbot
Date:	7 th February 2019



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Please complete Part A in full. Please note anonymous comments cannot be accepted, a full address including postcode must be provided.

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PART A	Your Details	Agent's Details (if applicable ¹)
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Address	[REDACTED]	-
Postcode	[REDACTED]	-
Telephone	[REDACTED]	-
Email	[REDACTED]	-
Organisation (if applicable)	Both members of Southbourne Parish Neighbourhood Plan Steering Group	-
Position (if applicable)	Volunteers	-

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To which part of the document does your representation relate?

Page/ Paragraph Number:	Page 35 paras 4.13 – 4.21 Page 36 paras 4.22- 4.24 Page 64 paras 6.86 – 6.90	Policy Reference:	S3 Development Strategy S4 Meeting Housing Needs AL13 Southbourne Parish
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☒ X

Have Comments ☐

Enter your full representation here giving details of your reasons for support/objection:

We object to the lack of comprehensive guidance for the east-west corridor. This should be provided by a new Local Plan Policy & subsequent Supplementary Planning Guidance (SPG).

The development strategy seeks “to focus the majority of planned sustainable growth at Chichester and within the east-west corridor”(S3).

The description “corridor” implies that it is little more than ribbon development along a transport route and a better term could be found. In reality, the Bourne villages are vibrant communities with quite different individual characters.

We have calculated that some 40% of the new housing proposals (S4 : total 5595 dwellings) are being allocated to this area (2250 dwellings). While Neighbourhood Plans will probably be reviewed to allocate particular housing sites there will be attendant problems that will be difficult for Neighbourhood Plans to deal with individually. These include:-

- 1 Traffic on the A259. It appears that despite the quantity of new development being put forward, there has been no analysis of the impact locally. There are no proposals to manage the additional traffic on the A259. For example, there is scope for a co-ordinated approach to keep speeds down, provide village gateways and more pedestrian crossings. Cycle lanes are sporadic;
- 2 Waste Water Treatment There has been concern for a number of years about whether there is adequate capacity both at the Thornham Works and in the pipe network. There have been occasions when sewers have surcharged. Storm water discharges of sewage, which has only had primary treatment, into Chichester Harbour have been increasing. This issue needs to be addressed for the Bournes area as a whole;

- 3 Coalescence No doubt Neighbourhood Plans (NPs) will address this but it would have been helpful to have had the results of the District Council's "Countryside Gaps" study and Local Plan Policy to help maintain appropriate Gaps. It is hoped that the NP reviews will be able to inform this Study. Gaps will be under considerable pressure from developers, therefore in the meantime we suggest that Neighbourhood Plans should contain policies relating to land outside Settlement Boundaries (ie Countryside Gaps as defined locally) to ensure their proper protection. Local Plan Policy need not await the next review but could be embodied in SPG which could be issued earlier;

- 4 Green Space The provision of wildlife corridors should be consistent throughout the east – west area and SPG would underpin this. Furthermore, a substantial amount of green space in Southbourne is envisaged in the current Southbourne Parish Neighbourhood plan (SPNP) through the proposed Green Ring. Currently it includes a proposed road and pedestrian route over the railway on the west side of the village and a proposed pedestrian footbridge over the railway on the east side. Parts of it may be secured via new development and it should also attract independent funding. The Green Ring is intended to alleviate the problems of disturbance to birds in the Harbour caused by visitors, especially some of those with dogs, and provide a local alternative multi-purpose recreational route. The development of 1250 dwellings is likely to generate significant additional pressure on the Harbour and an increase in the need for public green space generally, which is already underprovided in the Parish. The Green Ring could fall within the definition of a SANG (Suitable Alternative Natural Greenspace) and provide an opportunity for some funds already collected from local developers for the Solent Mitigation Strategy to be spent in Southbourne to alleviate the problems arising directly from new development here. A comprehensive green space policy for the Bournes area could reinforce the importance of this proposal and help secure funding.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

The inclusion of a new Policy to provide some co-ordinated support for issues affecting all the Bourne villages, followed by details set out in Supplementary Planning Guidance.

(Continue on separate sheet if necessary)

Declaration

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Name (<i>print</i>):	Sue and Geoff Talbot
Date:	7 th February 2019



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Full Name	Sue & Geoff Talbot	-
Address		-
Postcode		-
Telephone		-
Email		-
Organisation (if applicable)	Both members of Southbourne Parish Neighbourhood Plan Steering Group	-
Position (if applicable)	Volunteers	-

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No ☒

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PART B

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To which part of the document does your representation relate?

Page/ Paragraph Number:	Page 90 Para 5.66	Policy Reference:	S30 Strategic Wildlife Corridors
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Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support ☐

Object ☒ X

Have Comments ☐

Enter your full representation here giving details of your reasons for support/objection:

We fully support Policy 30, but object to the omission of a Wildlife Corridor directly along the route of the Ham Brook in Southbourne Parish. This would be in addition to the corridor identified east of Hambrook village. The evidence set out in the Council's own paper (Strategic Wildlife Corridors, Local Plan Review Background Paper, December 2018) demonstrates the importance of this additional area, including reference to identified water vole and bat networks, a considerable number of rare species sightings, and barn owl habitat. It has both over and under access across the A27 to the north and clear access beyond to the National Park. It meets Chichester Harbour at the Nutbourne Marshes Local Nature Reserve and adjoins the Nutbourne Mill Pond (SSSI) at its southern end, where we believe a Harbour Conservancy Management Programme is underway and a considerable number of rare species have been recorded. It meets all the criteria set out in paragraph 4.7 of the Background Paper and can be seen to provide at least as much wildlife habitat, if not more, as the selected "corridors".

This area is described as "West of Nutbourne" in the Background Paper. It was considered as an alternative to the "Proposed Chidham/East of Nutbourne Strategic Wildlife Corridor", and rejected (paragraph 5.5). The case for these corridors is well argued in the Paper and the fact that they will probably provide the only places where wildlife can pass safely from the National Park to Chichester and Pagham Harbours shows their importance. There are few places left where "corridors" can be identified and the opportunity to recognise the potential of the Ham Brook corridor and protect it should not be lost while we still have the chance.

Three reasons were given for its rejection in the background paper :-

- 1 The first was the proximity of residential areas. We dispute this because the survey material published in the Background Paper shows that despite proximity a significant number of wildlife sightings have been recorded sufficient for this area to be a candidate corridor.
- 2 The second is "proposed development". We can find no evidence that current building is a

problem. The "Meadow View" housing site at Nutbourne is underway (HELAA – HSB0008). It provides considerable open space around the site including a buffer area alongside the Ham Brook. The developer has been made aware of the likely presence of water voles in the adjoining watercourse, and he has delayed management works until an ecologist can attend to supervise. "Proposed development" could refer to future development sites identified in Neighbourhood Plans. There are three other HELAA sites within this "corridor" area (HSB0012, HSB0009, and HSB0001) but it is far too early to suggest that any of them might be identified for development as a result of the review of the Southbourne Parish Neighbourhood Plan (SPNP). Even if any of them were, it would be possible to require the retention and management of appropriate gaps or buffers within such sites.

- 3 The last reason was that the "corridor" would be too narrow to act as a "suitable functional strategic corridor". There is no evidence to suggest that this is currently the case, nor likely to be in future.

We consider that none of these reasons are sufficient to justify the omission of the Ham Brook. It is one of the more significant watercourses in the area between Lumley and Fishbourne. All the other major watercourses in this area flowing from the Downs to the Harbour form the basis of a proposed wildlife corridor and it is inconsistent to exclude the Ham Brook.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

The inclusion of an additional wildlife corridor along the Ham Brook in Southbourne Parish.

(Continue on separate sheet if necessary)

Declaration

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Full Name	Sue & Geoff Talbot	-
Address	[REDACTED]	-
Postcode	[REDACTED]	-
Telephone	[REDACTED]	-
Email	[REDACTED]	-
Organisation (if applicable)	Both members of Southbourne Parish Neighbourhood Plan Steering Group	-
Position (if applicable)	Volunteers	-

Is this the official view of the organisation named above? Yes ☐

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PART B

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To which part of the document does your representation relate?

Page/ Paragraph Number:	Page 29 Paras 4.1 - 4.6	Policy Reference:	S1 : Presumption in favour of Sustainable Development
	Page 33 Paras 4.7 - 4.12		S2 Settlement Hierarchy
	Page 35 Paras 4.13- 4.21		S3 Development Strategy
	Page 54 Paras 4.80-4.86		S12 Infrastructure Provision
	Page 128 Paras 6.86 - 6.90		AL13 Southbourne Parish

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

Support ☐

Object ☒

Have Comments ☐

Enter your full representation here giving details of your reasons for support/objection:

We support the general approach taken in the Preferred Approach and appreciate the difficulty in balancing the requirements for new housing placed on the District Council against the need to protect sensitive and attractive areas. We support Policies S1, S2 and S3 in principle. However, we are concerned about the impact that 1250 new dwellings could have on Southbourne and its residents. Infrastructure in the Parish is already inadequate. The infrastructure required to serve the new development as listed in Policy AL13 must be delivered on time, ie before or during the proposed development, if the quality of the local environment and the residents is to be protected. Therefore, we support the framework provided for the Southbourne Parish Neighbourhood Plan review set out in AL13 provided the infrastructure is delivered in time as set out in Policy S12. If delivery cannot be guaranteed we would object to the proposed housing numbers.

(We have raised objection to Policy AL13 (4) which is addressed in a separate submission).

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

We request the word "address" in line 5 of the first paragraph (Policy AL13) be replaced by the word "deliver" in order that it dovetails better with Policy S12.

(Continue on separate sheet if necessary)

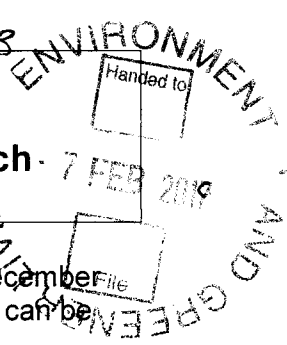
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PART A	Your Details	Agent's Details (if applicable ¹)
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To which part of the document does your representation relate?

Page/ Paragraph Number:	Pages 77 - 80 Paras. 5.15 – 5.33	Policy Reference:	S23 :Transport and Accessibility
----------------------------	-------------------------------------	-------------------	-------------------------------------

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

Support ☐

Object ☒ X

Have Comments ☐

Enter your full representation here giving details of your reasons for support/objection:

An analysis should be undertaken of the effect of the increased traffic on local roads generated by the proposed development in Southbourne and appropriate road improvements and traffic management implemented accordingly. Reference should be made to the road bridge proposed over the railway in the Southbourne Parish Neighbourhood Plan in the table following paragraph 5.31 and Policy S23.

Road traffic analysis associated with the current Local Plan only considered the Southbourne Traffic Zone (TZ73) with Chichester in terms of the impact of new development on the A259 Hampshire border and at the Fishbourne junction (A259 / A27). Eleven additional traffic zones appear to have been added to the CATM to accommodate future Local Plan trips arising from proposed housing allocations. The results of these zones do not appear to illustrate the local traffic impact. They seem to assess only the aggregated effect on the 19 junctions examined by the latest Transport Study (page 11 and Figure 3.4, Transport Study of Strategic Development Options and Sustainable Transport Measures – Peter Brett Associates). Despite some 40% of the new housing allocations (2250 dwellings) being proposed within the Bournes Area west of Chichester, the same approach has been taken in preparing the Review Preferred Approach. All the detailed work has focussed on Chichester and its immediate surroundings. The proposed development of 1250 dwellings at Southbourne is certain to have some impact on the local road network within TZ73 and this should not be ignored.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

An analysis of traffic movement within the Bournes area and particularly within Southbourne should be undertaken. Policy 23 should refer to the need for new proposed crossings over the railway line at Southbourne.

(Continue on separate sheet if necessary)

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