



## 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	Ian Johnson
Address	Luken Beck mdp Ltd, 30 Carlton Crescent, Southampton
Postcode	SO15 2EW
Telephone	██████████
Email	████████████████████
Organisation (if applicable)	Luken Beck mdp Ltd obo Seaward Properties Ltd
Position (if applicable)	Managing Director

Date	03.06.21
------	----------

## PART B

To which part of the document does your representation relate?

Paragraph Number	Vision, Objectives & Land Use Policies	Policy Reference:	
------------------	--	-------------------	--

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:

This formal response to the Submission Reg 16 Draft Southbourne Parish Neighbourhood Plan 2019 – 2037 is made on behalf of our client, Seaward Properties, who have an interest in the land located north of Penny Lane, Hermitage and south of the railway line. The site has been identified as a 'deliverable' within the Chichester Housing and Employment Land Availability Assessment (HELAA) 2021 (ref. HSB0007).

Our client is fully in agreement with the Parish Council's Vision and Objectives, with regard to supporting a mixed and integrated community and sustainable and energy efficient developments with regard to protecting the environment, promoting sustainable transport, good design, employment, enterprise, healthy lifestyles and contributing towards infrastructure provision to meet the requirements of existing and future residents.

Our client also supports those aspects of the Reg 16 Plan that are consistent with the 'basic conditions and other legal requirements' (ref. Para 37, NPPF 2019) for Neighbourhood Plans, as set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990, (as amended), which states [**my emphasis**]:

*'A draft order meets the basic conditions if –*

- a) **having regard to national policies** and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan);
- b) *having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders;*
- c) *having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders;*
- d) **the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development;**
- e) **the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan** for the area of the authority (or any part of that area);

- f) *the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, retained EU obligations;*
- g) *prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).'*
- (Continue on separate sheet if necessary)

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

n/a

(Continue on separate sheet if necessary)

Paragraph Number		Policy Reference:	Policy SB1
------------------	--	-------------------	------------

**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:**

Our client represents the freehold owners of the Land North of Penny Lane, Hermitage (c 5.4 ha), which has been identified as a 'deliverable' site for 170 dwellings within the Chichester Housing and Employment Land Availability Assessment (HELAA) 2021 (ref. HSB0007).

The site is located adjacent to existing residential curtilages to the south and is well contained to the north, east and west by the railway line, local gap and ancient woodland respectively. It benefits from a safe vehicular access onto Penny Lane and is environmentally unconstrained, in terms of ecology, landscape, surface water drainage, noise and air quality and assets of historic importance. The site is immediately available for residential development for c. 85 dwellings at a modest density, with a new parkland to project the 'gap', provide sustainable drainage, a local amenity and off-set nitrate impact. We understand there are no issues constraining development viability.

In addition, to the proposed Policy SB 2 Eastern Extension to Southbourne, accommodating a proportion of the Parish's housing requirement on smaller sites will make an important contribution to meeting local housing need in the 'service villages', particularly within the early years of the emerging Local Plan. In allowing such sites to come forward the Parish could also be facilitating new community infrastructure, funded through CIL and / or S106 Legal Agreements.

This approach is supported in Paragraph 68 of the NPPF, which states

*'68. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:*

*(a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*

*(b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;*

*(c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and  
(d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.'*

Notwithstanding the benefits of the proposed Eastern Extension in the mid to later years of the Neighbourhood Plan period, smaller sites can also play an important role in sustaining key services and facilities within Hermitage, Southbourne and Emsworth, which have been in decline in recent years due to changing shopping habits and community displacement from increasing affordably gaps, in part due to constrained housing supply.

We therefore encourage the Parish Council to pursue a strategy of allowing some limited dispersal of development in suitable locations and in proportion to the size of Hermitage as the most sustainable strategy for the distribution of housing over the Plan period.

(Continue on separate sheet if necessary)

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

We support the objective of this policy to expand the existing urban area beyond its current built form in order to enable the existing communities to grow and develop, maintain the viability of local services and facilities and provide an appropriate level of affordable housing to meet identified local needs.

However, the current wording of the Policy will not be effective unless housing is delivered throughout the Plan period. The following change to the Policy wording [***proposed change in italic bold text***] is considered necessary in order to achieve criteria 'a', 'd' and 'e' of Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

*'A. The Neighbourhood Plan will support sustainable development proposals located inside the Settlement Boundaries of Southbourne / Prinsted, Nutbourne West and Hermitage / Lumley / Thornham, as shown on the Policies Map, provided they accord with other provisions of the Neighbourhood Plan and development plan.*

*B. Development proposals outside the settlement boundaries will be required to conform to development plan policies in respect of the control of development in the countryside. All proposals should avoid the actual or perceived coalescence of the settlements nor should they undermine the distinctive character or qualities of the Chichester Harbour AONB. **In addition to Policy SB2, suitable settlement extension sites outside of existing built up boundaries, will be supported where they wholly accord with the following criteria:***

***The impact of the development individually or cumulatively does not prejudice Policy SB2, or the development plan otherwise;***

***The development is demonstrated to meet the identified local housing needs and/or employment needs and will assist the retention and enhancement of community facilities and services;***

***The site and adjoins an existing settlement edge and the level of expansion is appropriate to the scale and function of the settlement; and***

***The development is contained within an existing defensible boundary and landscape and townscape character features are maintained and enhanced.***

*C. All proposals will be expected to support the delivery of the Green Infrastructure Network and 'Green Ring' as defined in Policy SB13 where they lie within or adjacent to its location.'*

(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.