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Sent: 06 December 2021 14:04
To: Neighbourhood Planning
Cc: Jen Samuelson
Subject: Response to Focussed Consultation on Southbourne Neighbourhood Plan
Attachments: 27783 JS RS 211206 Examiner consultation response final.pdf

Good afternoon

I am pleased to attach the response of the developer consortium to the above consultation.

Should you wish to clarify any matters then do let me know.

Kind regards

Robin

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6 December 2021

BY EMAIL: neighbourhoodplanning@chichester.gov.uk

Dear Ms Dobson

RE: FOCUSED CONSULTATION ON THE SOUTHBOURNE NEIGHBOURHOOD PLAN

This letter is submitted by Barton Willmore on behalf of the developer Consortium (Wates Developments Ltd and Seaward Properties Ltd) for the Land East of Southbourne allocation under Policy SB2 of the draft Neighbourhood Plan under Examination.

This letter responds to the focussed consultation on the following matters:

1. Delete Appendix A [SPNP Modification Proposal Statement] in its entirety and renumber Appendix B to G as Appendix A to F
2. Update Policies 2, 3 and 8 and supporting text of the Southbourne Neighbourhood Plan 2014 – 2029 and renumber as Policies SB23, 24 and 25
3. Insert the updated policies SB23, 24 and 25 and supporting text into page 73 of the submission version of Southbourne Parish Neighbourhood Plan Review 2019 – 2037 and update policies maps accordingly.

It is understood that the above proposed amendments to the Neighbourhood Plan allows for the policies within the adopted Neighbourhood Plan to be retained and incorporated into the updated/new Neighbourhood Plan, in order to accord with the legislative requirement under Section 38B(2) of the Planning and Compulsory Purchase Act 2004 (as amended) that there is only one Neighbourhood Plan for any Neighbourhood Plan area.

In this regard, the Consortium is supportive of the combining of the adopted policies into the new Neighbourhood Plan. In addition, by having all policies within one document, this will provide a clear and easy understanding of the adopted policy position for applications within the Neighbourhood Plan for the community, officers and the development industry.

Proposed Policy SB23: Housing Site Allocations on Approved Sites

It is noted that Policy 23 relates to the previously allocated sites within the adopted Neighbourhood Plan, and is updated to reflect the subsequent planning permissions that have been secured.

Overall, the inclusion of these policies is supported and provides an updated position for each of the adopted allocation sites. However, it is noted that the former paragraph 4.23 in the supporting text states that the Priors Orchard site *"offers the only realistic opportunity east of the railway station to achieve a new access to the north of the village via a new railway bridge for pedestrians"*.

Whilst this was the position when the adopted Neighbourhood Plan was under preparation, the Neighbourhood Plan now under examination includes alternative opportunities for a pedestrian railway bridge as part of the vehicular railway bridge proposed under the Policy SB2 allocation. Furthermore, we understand there have also been concerns from WSCC regarding the security of the school from an overbridge in this location. Therefore, it is recommended that the above sentence is updated to state:

*"offers ~~the only realistic~~ an opportunity east of the railway station to achieve a new access to the north of the village via a new railway bridge for pedestrians, **subject to the masterplanning evolution of the proposed allocation east of Southbourne under Policy SB2 and WSCC being satisfied that such a connection does not undermine the security of the neighbouring school**"*.

Proposed Policy SB24: The Green Ring

The Consortium are supportive of the provision of the Green Ring within the Land East of Southbourne allocation. As set out in previous representations, given the early stage of the neighbourhood plan and that technical work and masterplanning of the allocation site is ongoing, it is recommended that the Green Infrastructure Network Plan supporting Policy SB13 and referred to within this draft policy is updated as *indicative of* principles sought, with the exact routing and positioning of the Ring, the developable areas and other features to be subject to more thorough community engagement and consideration through the masterplanning and delivery framework exercise set out in Policy SB2.

There appears to be overlap and duplication of policy within the proposed policy SB24 and the draft policy SB13, particularly in relation to policy SB13 criterion D, which both deal with the event that any proposal prejudices the completion of the Green Ring.

As set out in our Regulation 16 representations, modifications were recommended to policy SB13(D) to align with the wording of policy SB2(B)(a). Following conversations with the Neighbourhood Plan Group after the Regulation 16 consultation in June 2021, were the Examiner minded, the policy could go further to state:

*D. Proposals that will prejudice the completion of the Green Ring or lead to the loss of land lying within the Network and that will undermine its integrity will not be supported, **unless alternative routing of the network within any application demonstrates it will still deliver or enhance the objectives, integrity and cohesiveness of the Green Ring.** Development proposals that will lead to the extension of the Network to create additional recreational opportunities will be supported provided they do not adversely affect the character, environment and appearance of the Chichester Harbour AONB, result in adverse effects on the integrity to the Chichester Harbour SPA, and are consistent with all other relevant policies of the development plan.*

It is recommended that either the above policy wording, relating specifically to the Green Ring, is incorporated into Policy SB24 and removed from Policy SB13, to avoid duplication of policy as per the National Planning Policy Framework paragraph 16, or draft Policy SB24 is updated as follows:

*Development proposals that lie within the broad location of the Green Ring will be required to align their development principles and public open space requirements with its objectives, so that they contribute to its successful formation and maintenance. Proposals that will lead to the unnecessary loss of Green Ring land or features or that will prejudice the completion of the Green Ring will be resisted, **unless alternative routing of the network within any application demonstrates it will still deliver or enhance the objectives, integrity and cohesiveness of the Green Ring.***

The new paragraph proposed to be inserted after the previous paragraph 4.34, which relates specifically to the green infrastructure assets within the Land East of Southbourne being derived from a detailed masterplanning exercise, is supported as it provides the flexibility to create a high quality place. As per our recommendations at Regulation 16 stage, it is recommended that the second part of the sentence is slightly amended for the layout to "have regard to" the Masterplan Briefing Report at Appendix A, rather than "being informed by" that Report. This provides greater flexibility for alternative options to be presented and agreed where the detailed masterplanning exercise and technical work identifies a more suitable, and efficient, approach to the Green Infrastructure Network that also meets the wider development objectives for the site.

With regard to previous paragraph 4.39, the Consortium is supportive of delivering biodiversity net gain across the site as a whole, where opportunities to enhance biodiversity within the Green Ring will be taken. Calculations undertaken to date indicate that biodiversity net gain can be achieved; however, the specific net gain will be calculated following the masterplanning process and will be determined by the other facilities and uses to be provided, which may include play provision, cycle paths and provision of amenity greenspace for kickabout and enjoyment. The Consortium is keen to work with the Neighbourhood Plan Group and wider community to evolve the character of this area.

The retention of former paragraph 4.41, which states that the Green Ring is "only shown as a broad location on the Policies Map because its details will be resolved through the consideration of planning applications" is supported. As we have set out in previous representations, and above, this flexibility should also be incorporated into policy to ensure there is opportunity to provide the most appropriate scheme, positioning and routing of the Green Ring once more detailed masterplanning and technical work is completed.

Proposed Policy SB25: Education

The retention of this policy is supported. The expansion of existing leisure and outdoor sports facilities is often more cost efficient to manage and run in the long term, and encourages a greater uptake of sports as multiple facilities and pitches are easily accessible in one place. Therefore, opportunities to expand the existing sports facilities at Bourne Community College for wider use by the community will provide an excellent opportunity.

The allocation proposals to the east of Southbourne could also provide off-site contributions for the provision of additional pitches at this facility, where identified necessary within the Infrastructure

Delivery Plan. It is noted that this was the preferred option for Chichester District Council in the Preferred Approach Regulation 18 consultation Infrastructure Delivery Plan.

Other comments

Throughout the above representations, a consistent theme is the comprehensive masterplanning of the allocation site SB2, in relation to the Green Ring as well as connectivity and accessibility to facilities and services.

The Consortium is preparing a draft Masterplan and Delivery Framework that has regard to the Neighbourhood Plan Group's aspirations, as well as the technical work that is being undertaken to underpin a more detailed and evolved masterplan. The Consortium is engaging with the Neighbourhood Plan Group to discuss the work that has been undertaken to date and to agree consultation programme with the community. This wider engagement seeks to include a range of community workshops so as to genuinely offer the opportunity for the community to influence the proposed development.

It is noted that the draft Policy SB2 requires that this Delivery Framework Plan is submitted to the council prior to determination of any planning applications on the allocation land. Further to conversations with the Neighbourhood Plan Group following the Regulation 16 consultation in June 2021, concerns have still been expressed regarding the need to ensure the proposal is delivered as a cohesive place and in a co-ordinated manner. Therefore, to ensure that the applications accord with an agreed masterplan and delivery framework, an alternative approach is recommended as follows (amendments in **bold**):

*"A single comprehensive masterplan and delivery framework is prepared for the whole of the allocated land with the active participation of the community in accordance with Local Plan Policy 7 of any successor policy and submitted **and approved by the** District Council prior to the determination of any planning applications on the allocated land.*

A single application for the allocation site is preferred and will be supported to ensure the phased provision of the policy requirements in full.

In the event any applications are submitted for part of the land allocated by Policy SB2, such applications must demonstrate how they:

- ***accord with and will implement the approved masterplan and delivery framework***
- ***do not undermine or prejudice the delivery of the remaining land within the allocation; and***
- ***make provision for all the community and physical infrastructure included in Policy SB2 and the masterplan and delivery framework.***

Land required for the full delivery of main spine road and railway crossing, including accesses onto the A259 and Stein Road, shall be safeguarded and transferred to WSCC / Chichester District Council.

Applications shall be determined in accordance with the agreed framework.

Summary

Overall, the Consortium is supportive of the proposed amendments to the Neighbourhood Plan. As set out throughout the above, for the purposes of flexibility within policy, avoidance of duplication in policy wording, and to ensure the allocation proposals can achieve national and local objectives of efficient use of land, achieving biodiversity net gain, and delivering a high quality place for people to live and work well, amendments are suggested to the policy and supporting text wording.

This aligns with the requests made within the Regulation 16 consultation response by the Consortium.

Yours sincerely,

ROBIN SHEPHERD

Senior Planning Partner