

Dear Mr Weaver,

I am writing with respect to a recent document 'APPENDIX_4_TO_LETTER_TO_HBC_17_08_2022-1692441.pdf' that you have posted on the website as a Comment from the applicant's agent on APP/21/01310.

This document contains a number of seriously inaccurate statements and a potentially defamatory reference to the Chichester Harbour Conservancy, a statutory consultee for this planning application. I would like to ask you to take this document down from the website and also to ensure that it is not treated as a 'Background paper' within the meaning of The Openness of Local Government Bodies Regulations 2014 clause 6 (<http://www.legislation.gov.uk/ukdsi/2014/978011113554>). This would mean that the document would not be available for consideration by Councillors in their decision-making on this matter.

You will also note the guidance in the Planning Advisory Service guide (<https://www.local.gov.uk/sites/default/files/documents/20210622%20-%20Planning%20and%20GDPR%20PAS%20guide.pdf>) states that for inappropriate responses "LPAs need not spend their time redacting or summarising this type of comment and should instead refuse to publish or even accept them".

This document includes the following statements:

1. 'A designation such as SSSI status, AONB or Nature Reserve and others does not mean that weddings, events etc. cannot take place within these designated areas.'

This is wrong. In the case of SSSI's the designation does mean events cannot take place in venues on SSSI land without Natural England consent and this is rarely if ever given. The presence of large numbers of people disturbing fauna, waste production and physical changes to the environment at events all conflict with the Operations Requiring Natural England's Consent (ORNECs) in SSSI's. In Tournerbury Woods the applicant has unilaterally made a wide range of changes to set up the wedding venue without consent for a large number of ORNECs. I will send you a catalogue of unconsented damage to the special interest of the SSSI in a separate communication in order to set this out in detail.

2. 'Evidence that this is the case at Tournerbury is provided by the consistently favourable condition site assessments made by Natural England of Tournerbury Woods over the many years in which weddings and events have been taking place on site.'

This is wrong. No site condition survey has been undertaken by Natural England since 9th July 2010 according to their records on their 'Designated Sites View':

<https://designatedsites.naturalengland.org.uk/UnitDetail.aspx?UnitId=1016959&SiteCode=S1003245&SiteName=&countyCode=&responsiblePerson=>

Natural England have confirmed to us that they will carry out an updated site assessment this autumn, which will establish the up-to-date status of this unit of the SSSI. Given the damage to the site by unconsented ORNECs it will be difficult to sustain a favourable condition.

3. 'We draw your attention to venue 16 below, sited to the east of Tournebury (sic), across Chichester Harbour but is subject to very similar environmental and SSSI considerations as Tournebury Woods Estate'.

This is wrong. Site 16 in Appendix 4 is Itchenor Sailing Club, which is adjacent to, but not on SSSI land. As it is outside SSSI land it is therefore subject to permitted development rights unlike SSSIs and so it is not similar to Tournebury Woods.

In fact none of the 16 sites cited in Appendix 4 are on SSSI land according to the Government's own MAGIC maps site, and all of them have surfaced (tarmac) road access unlike Tournebury, which only has a narrow unsurfaced track.

Please see the slides attached where I have extracted the maps of all 16 sites from MAGIC for private research use and plotted the venue building with the nearest SSSI designated land. Presentation of these sites as on SSSI designated land is misleading as the slides show.

Could you please acknowledge this email?

Best wishes