



LRM
PLANNING
LIMITED

Chichester Local Plan Review

Proposed Submission Plan

Representations on behalf of Hallam Land Management Limited

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1 Introduction

- 1.1 These Representations have been prepared on behalf of Hallam Land Management Limited (hereafter 'Hallam'), in response to the Chichester Local Plan Review Proposed Submission Plan consultation.
- 1.2 Hallam is a strategic land promotion company operating throughout England, Wales and Scotland delivering land for new employment and commercial premises, housing, including specialist elderly housing, and mixed-use developments. Hallam has been acquiring, promoting, developing and trading in land since 1990. During that time, the company has established an outstanding record in resolving complex planning and associated technical problems in order to secure planning permissions for a whole range of different land uses to facilitate the delivery of new development.
- 1.3 Hallam control land to the west of Southbourne, to the north of the A259 and south of the railway line. Development of this land for new housing including specialist elderly accommodation, as shown in the accompanying Vision Document, would be consistent with the established Spatial Strategy; which is rightly retained in the consultation document. Similarly, development would contribute towards meeting the future housing needs of the District within the proposed Broad Location for Development (BLD) at Southbourne.
- 1.4 These Representations set out our support for the BLD drawn on the key diagram to the west and east of Southbourne. However, Hallam are seeking amendments to Policies S1, H1, H2, H8 and A13 to ensure that: the overall housing needs are met across the District, including early delivery and specialist accommodation; the flexibility sought early in the Submission Plan, at Policy S2 and H1, is carried through to the strategic allocations and locations; and, the BLD is distributed to the west and east of Southbourne.
- 1.5 Moreover, Hallam are proposing the allocation of small and medium scale sites at Southbourne within the Local Plan, to enable early delivery of housing and infrastructure, with the land under their control a suitable site for this allocation. Should the Council not allocate these sites, then the strategic allocations/locations policies need to be updated to reflect the requirement for the delivery of small and medium scale parcels which could form part of the larger sites.
- 1.6 In the context of the above, it is instructive to note that Chichester District has an older population than national average, which has been predicted to increase by 42% between 2021-2039. The increasing need for specialist accommodation should be addressed through specific allocations within the Local Plan, rather than the proposed approach of Policy H8.
- 1.7 Our response is focused on the following matters:
 - The Spatial Strategy, settlement hierarchy and the distribution of development across the District;
 - The overall amount of new housing required within the new plan period;
 - The need for specialist accommodation;
 - The status of Southbourne and the role and function it plays; and
 - The strategic allocation proposed at Southbourne in Policy AL13.



- 1.8 In preparing the Local Plan Review, the Council will need to ensure that it complies with paragraph 35 of the National Planning Policy Framework (NPPF) (2021) which sets out four tests to ensure the plan is 'sound'. These are as follows:
- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet needs from neighbouring areas are accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by statements of common ground; and
 - Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.9 We are mindful that the Government has recently published a consultation concerning potential amendments to the NPPF. Paragraph 1 of that consultation document indicates that the government is committed to “building more homes” whilst Paragraph 6 explains that the government “remains committed to delivering 300,000 homes a year by the mid-2020s”.
- 1.10 In the proposed revisions, paragraph 1 makes clear that the NPPF provides “*a framework within which locally-prepared plans can provide for sufficient housing and other development in a sustainable manner.*” At paragraph 60 the overall aim of a Local Plan is identified as meet[ing] as much housing need as possible with an appropriate mix of housing types to meet the needs of communities.
- 1.11 It is clear therefore that the potential amendments to the NPPF firmly intend that Local Plans, including this one, continue to provide a sufficient supply of housing land to meet identified needs.



2 Objectives and Spatial Strategy

Objectives of the Local Plan

- 2.1 The Submission Plan has identified key challenges and opportunities that influence future planning, across the three areas of the District, and how it aims to address these through planning policies and proposals.
- 2.2 Within the consultation document, the strategic objectives presented by the Council are structured into specific categories, ensuring housing and neighbourhood objectives are clearly set out for the plan period.
- 2.3 Amongst these is the objective to **increase housing supply; increase provision of affordable housing; and promote the development of mixed, balanced and well-integrated communities**. These are consistent with the NPPF's policy objective to significantly boost the supply of housing in paragraph 60. In this context, it is right that the Local Plan's development strategy is founded on this objective, ensuring sustainable development which responds to social, economic and environmental considerations that meets the needs of the plan area.
- 2.4 These objectives frame the policies and proposals for future development across the plan area to create sustainable neighbourhoods; this demonstrates, as a matter of principle, that the Local Plan intends to be *positively prepared and justified*, albeit there are limitations on how this is achieved in practice when the policies and proposals are considered.
- 2.5 The NPPF states at paragraph 22 that strategic policies should look ahead over a minimum 15 year period from the date of the Plan's adoption. The Local Plan aims to cover the period of 2021-2039, which is 18 years. However, this plan has not been adopted yet and it is considered unlikely that this Local Plan will be adopted before 2024-25. Therefore, the Plan may not cover the required plan period of 15 years and the Council should extend the plan period to at least 2040 to ensure this requirement is met.

Policy S1: Spatial Strategy

- 2.6 The Spatial Strategy is accompanied by the Key Diagram (Map 3.1), identifying the distribution of development and infrastructure provision across the plan area.
- 2.7 The strategy aims to build on the existing Local Plan, focusing growth at Chichester city, as the main sub-regional centre, and at two settlement hubs along the east-west corridor at Tangmere and Southbourne.
- 2.8 Policy S1 specifically identifies the broad approach to providing sustainable development, in accordance with the Local Plan Objectives, ensuring development is focused principally **along the east-west corridor**. It aims to distribute development in line with the settlement hierarchy, ensuring development is located in the larger and more sustainable settlements.
- 2.9 This accords with paragraph 20 of the NPPF which requires strategic policies to set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing, infrastructure, community facilities along with policies that seek to conserve and enhance the environment.



- 2.10 Paragraph 105 of the NPPF states that the planning system should actively manage patterns of growth in support of these objectives. With significant development being focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- 2.11 Paragraph 69 of the NPPF sets out how small and medium scale sites can make an important contribution to meeting the housing requirement. Part d) identifies how working with developers to encourage the sub division of large sites could help to speed up the delivery of homes.
- 2.12 In this context, Policy S1 (6) outlines how non-strategic provision is made for small scale housing developments consistent with the indicative housing numbers set out in Policy H3, however this does not identify an approach to medium scale sites. Consequently, the Local Plan should allocate small and medium scale sites for residential development.
- 2.13 Should the Local Plan not allocate these scale sites, then there should be parcels within the BLDs identified as medium scale sites for early delivery in the plan period without prejudicing the BLDs. Policy S1 should be amended to include medium scale sites and to require flexibility to the housing target. This is discussed further in respect of Policy A13.
- 2.14 Policy S1 (7) states that strategic allocations and locations will be made through either this emerging Local Plan, the extant Site Allocation Development Plan 2014-2019 (or subsequent Site Allocation Development Plan Document (DPD)) and through Neighbourhood Plans. Notwithstanding the allocations in the emerging Local Plan, the most appropriate future mechanism is the Site Allocations DPD, which has to meet the 'tests of soundness' rather than 'basic conditions'. This more rigorous approach to plan making is better able to address the site selection process and assessment of delivery requirements that a strategic allocation will need to demonstrate, particularly when taking account of the scale of growth proposed at Southbourne.
- 2.15 Lastly, the final paragraph of Policy S1 states that to ensure that the Plan's housing requirement is delivered, "*the distribution of development may need to be flexibly applied, within the overall context of seeking to ensure that the majority of new housing is developed in accordance with this Strategy*". The wording of this should be amended to state flexibility will be needed rather than may be needed, to ensure there is the ability to mitigate delays on allocations being brought forward by alternative proposals in order to meet the housing requirement over the plan period.
- 2.16 The use of the Authority Monitoring Report to control this is considered an acceptable approach, and policies A6 to A15 should reflect this requirement for flexibility. In practical terms, the LPA will need to consider performance in bringing forward and delivering large-scale development and enable alternative solutions where the required outcomes are not being achieved. This is discussed later in relation to Policy A13 specifically.

Policy S2: Settlement Hierarchy

- 2.17 The consultation document sets out a Settlement Hierarchy which is to serve as the framework for the Council to achieve its vision for the plan area, meet the scale of development required and enhance the quality of the built natural, historic, social and cultural environments, whilst sustaining the vitality of communities. This hierarchy seeks to deliver sustainable development that will support the role and function of different places within the plan area.
- 2.18 In this regard, Policy S2 is consistent with the NPPF acknowledging how "significant development should be focused on locations which are or can be made sustainable, through limiting the need to



travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, improve air quality and public health.” (paragraph 105 refers). The Settlement Hierarchy ensures that new development is located in areas where residents have access to facilities and services and a range of public transport networks.

- 2.19 Chichester city is identified as the Sub-Regional Centre, with four Settlement Hubs being identified at East Wittering/Bracklesham; Selsey; Southbourne and Tangmere. This is a continuation of the existing spatial strategy in the Adopted Local Plan and consistent with the principle of locating new development at the most sustainable locations.
- 2.20 Southbourne is rightly identified as a Settlement Hub due to its range of local services and facilities, key public transport connections and employment/educational opportunities accessible via non vehicular methods of travel. The approach to Southbourne is discussed later at Section 4 and at Policy A13.
- 2.21 Accordingly, this strategic policy is *positively prepared and justified*, and is consistent with national policy promoting sustainable patterns of development.



3 Overall amount of Housing

Policy H1 Meeting Housing Needs

Housing Need

- 3.1 Paragraphs 60 and 61 of the NPPF state that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance.
- 3.2 Only in exceptional circumstances could an alternative approach be justified. But even then, that alternative approach will also need to reflect current and future demographic trends and market signals.
- 3.3 Policy H1 identifies the need for the Plan to make provision for at least 10,350 dwellings within the plan period, amounting to 575dpa.
- 3.4 This is lower than both a. the standard method figure of 638 dpa; and, b. the Preferred Approach figure in the previous consultation, of 650 dpa which included accommodating some unmet need arising from the South Downs National Park (SDNP) area. This shortfall will amount to over 1,100 dwellings across the plan period. Without any Statements of Common Ground being published by the Council or evidence of the shortfall being accommodated elsewhere, this remains unaddressed.
- 3.5 It is highly germane that the current Local Plan adopted a lower housing figure than the identified need of 505dpa, proposing instead to deliver 435dpa.

Affordability in Chichester

- 3.6 The affordability ratios have risen from 12.38 in 2015, when the current Local Plan was adopted, to 14.61 in 2021 for Chichester, which is significantly higher than the current 9.1 national average, increasing the need for affordable housing within Chichester.
- 3.7 Between the 2011 and 2021 census, the number of people ages 50 to 64 years rose by over 3,100 (an increase of 13.4%), while the number of residents between 35 and 49 years fell by approximately 1,900 (8.5% decrease).
- 3.8 Chichester's worsening affordability ratios and aging population, which typically occurs in line with house price increases, demonstrate the clear need to increase the housing delivery to meet current and future needs (in line with the NPPF), and maximise the potential for housing in this District. The current strategy to suppress housing provision will only exacerbate these problems.
- 3.9 With the Submission Plan proposing to not meet the identified need, this once again will be an issue which moves onto the next Local Plan, failing to tackle key issues across the District such as affordability and lack of housing land supply. These issues cannot simply be moved onto the next Local Plan, they should be addressed now.

Constraints for development

- 3.10 The lower figure of 575dpa reflects both the infrastructure constraints along the A27 and at the



Waste Water Treatment Works, but also no longer accommodating unmet need from SDNP.

- 3.11 The Transport Study (January 2023) assesses the capacity levels, with particular focus on the A27. Although the Council state that 535dpa is the highest level of development per year achievable, the conclusions of this latest Study state, at paragraphs 5.6.5 and 11.2.3, that development of 700 dpa could be accommodated (in the southern plan area) through the mitigation proposed in the previous scenario of 535dpa with some additional mitigation at the Portfield and Oving roundabout.
- 3.12 This Transport Study (2023) was published following the preparation of the Sustainability Appraisal which refers to the 2018 study, therefore the latest evidence on highways matters has not be considered within the preparation of this Local Plan.
- 3.13 This is fundamental to the Plan's approach – increasing the housing requirement could assist with funding those additional highway improvements, in line with the recommendations of the Transport Study at Section 9.3 to prioritise junctions to avoid delays to housing delivery. This should be further reviewed by the Council to ensure the District's need is not being understated. It is recommended the housing need figure is reviewed in line with this evidence and the need to meet the minimum of the standard method figure of 638dpa, and aim to return to the 650dpa previously proposed.

Duty to Co-Operate

- 3.14 Paragraph 24 of the NPPF outlines the need for co-operation between local planning authorities on strategic matters that cross administrative boundaries.
- 3.15 The East Hampshire Local Plan Review has identified 100dpa for the SDNP area of the District, below the identified need of 112dpa for the District's area and the overall requirement of 447dpa for the SDNP (Housing and Economic Development Needs Assessment 2017). In effect, in combination with Chichester, the National Park is needing to accommodate some 30 more dwellings per annum without any assessment as yet as to whether this can be achieved given the statutory protection that is afforded to it.
- 3.16 Whilst a Statement of Common Ground is referred to, it has not been published and therefore it is not possible to determine whether the decision not to make a provision for the National Park area is soundly based.
- 3.17 Previous evidence for the Preferred Approach demonstrated how the figure of 650dpa was achievable and necessary to help with the worsening affordability ratios across Chichester and the neighbouring authorities. Having removed provision for unmet need it is considered this plan has not been *positively prepared*.

Summary

- 3.18 Policy H1 clearly sets out how the majority of housing is to be delivered along the east-west corridor, with 535dpa in the southern plan area and 40dpa in the northern plan area. This is consistent with the Spatial Strategy and the Settlement Hierarchy, Policies S1 and S2, and the overarching objective of locating new housing at the most sustainable locations in the plan area.
- 3.19 By limiting the amount of housing there will be fewer schemes contributing to the required infrastructure improvements. Without developer contributions to fund wholesale upgrades to



this infrastructure there is a risk of pushing the problem down the line for the next Local Plan to address, whilst problems with affordability and an aging population are further exacerbated.

- 3.20 All future schemes will be required to mitigate their impact on infrastructure including highways and utilities, and there is an opportunity for small to medium scale sites to be delivered in the short term whilst the larger allocations and/or the majority of the larger allocations await the upgrading of these works.
- 3.21 Currently, the proposal to reduce the overall housing supply for the new plan period is not supported, and the Council should review the Transport Study with the intention of meeting the assessed level of local housing need in full. Without the identified housing requirement being met in full the problem of the younger population being unable to afford to remain in Chichester will continue, further growing the gap in workforce and an increasingly aging population.
- 3.22 Therefore, this policy is *not positively prepared, justified or consistent with the NPPF*.

Policy H2 Strategic Locations/Allocations 2021-2039

- 3.23 The wording of 'at least' within Policy H1 provides flexibility on the ability to achieve the minimum amount of housing considered necessary by the Council, in line with Policy S2. Although this quantum is not agreed, the approach using 'at least' is considered a sensible approach to allow the achievement rather than under delivery of much needed open and market housing.
- 3.24 The strategic locations/allocations set out in Policy H2 do not reflect this flexible approach. Instead, the sites are fixed as exact number of dwellings for those locations.
- 3.25 Paragraph 119 of the NPPF requires planning policies to promote an effective use of land in meeting the need for homes, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 3.26 Policy A13 is a BLD and is fixed at 1,050 dwellings within Policy H2, this does not allow for the masterplanning approach to further assess the actual capacity and the best use of this land.
- 3.27 As such flexibility should be embedded into the wording of Policy H2 to ensure that the intention of Policy S2 is achieved; the housing target of at least 10,350 dwellings across the plan period (Policy H1) is met; and the land identified for development is most effectively used.
- 3.28 Therefore, it is suggested that Policy H2 includes the wording "at least" before the quantum of development for any strategic location or allocation. For example, Policy A13 would instead state "at least".

Policy H8 Specialist accommodation for older people and those with specialised needs

- 3.29 National Planning Practice Guidance for Housing for Older and Disabled People states how plan-making authorities should set clear policies to address the housing needs for groups with particular needs such as older and disabled people.
- 3.30 The Housing and Economic Development Needs Assessment (HEDNA) (April 2022) assesses the period between 2021-2039 for older people and those with a disability.



- 3.31 This concludes that there will be a 42% increase in the population above 65 years old, amounting to 67% of the total population growth.
- 3.32 The HEDNA sets out how the East-West Corridor has a higher percentage of over 65 year olds (24.7%) compared to both Chichester City (24.2%) and the Plan Area North area (23.4%).
- 3.33 The needs arising from this, amounts to between 2,131 and 2,872 additional dwellings with support or care, and a need for 429-800 additional nursing and residential care bedspaces. This equates to approximately 17-24% of all homes needing to be some form of specialist accommodation for older people.
- 3.34 In this context, the HEDNA makes an important recommendation that the Council allocate specific sites for housing with care to ensure the identified needs are met. In contrast Policy H8 is a criteria based policy that seeks specialist accommodation for older people on housing sites over 200 units based on evidence of local need.
- 3.35 As written, there is no confirmation on the quantum of specialist accommodation that this policy or other site allocations will secure and how the specific need for each application is calculated. Policy H8 fails to address the identified overall need clearly, as required by National guidance. Therefore, it is recommended the Local Plan allocates sites to deliver this type of accommodation as intended by the HEDNA.
- 3.36 This approach risks the land on these sites being unable to deliver both the expected market/affordable housing and the specialist accommodation on site.
- 3.37 The land under Hallam's control would be a suitable site for this type of accommodation, which is situated along the east-west corridor in a sustainable location on the edge of Southbourne.



4 Southbourne

- 4.1 Southbourne is a key area in the District, in terms of existing development, its status as a Settlement Hub and its potential to accommodate future development.

Role of Southbourne

- 4.2 Southbourne is identified as a Settlement Hub within Policy S2.
- 4.3 Southbourne is located within the east-west corridor with a range of existing facilities, good transport links, and employment opportunities both to the east and the west.
- 4.4 As set out in the Submission Plan, Southbourne has good access to educational facilities serving the residents, including primary schools, junior schools and secondary schools. There are a number of convenience stores and other community services and facilities such as a GP practice, pharmacy and places of worship.
- 4.5 The Bourne Community Leisure Centre provides local residents with access to community sports facilities. Access to public open space is also good through connections to Southbourne Recreation Ground. There is potential for more open space to be provided for local residents within the Local Plan Review and the strategic allocation proposed and this approach is embedded within our own Vision Document.
- 4.6 A key focus of the Sustainability Appraisal and the Submission Plan is for schemes to promote a modal shift in transportation. The strong public transport links within Southbourne to the wider surrounding area allows access to employment opportunities within the east-west corridor. Southbourne has strong public transport connections to the local and wider area, through bus and train services, to areas including: Chichester, Portsmouth, Havant, Littlehampton, Brighton, Southampton and London.
- 4.7 For these reasons, Southbourne is rightly designated as a Settlement Hub and is eminently suitable to serve as a BLD.
- 4.8 The Southbourne Level Crossing Report May 2021 analyses the options for delivering the railway crossing at Southbourne. It concludes that circa 750 dwellings can be delivered north of the railway line before triggering the requirement for a new crossing. The report highlights how sites south of the rail line are not likely to impact on the level crossing and can therefore be delivered earlier than await the railway line improvements.
- 4.9 Therefore, in this context it would be appropriate to allocate small and medium scale sites to the south of the railway, which is less constrained by the capacity restriction on the railway crossing.
- 4.10 The land under Hallam's control is to the south of the railway line, would help facilitate a future new railway crossing to the north of the site, and would be of a medium scale to deliver housing early in the period plan.

Strategic Allocation A13

- 4.11 The Key Diagram appears to suggest that new development is to be located to the west and east



of Southbourne, remedying the previously unsuccessful approach of focusing development only to the east. Similarly, the Key Diagram acknowledges the need for development to the south of the railway line, facilitating development north of the railway line. It is recommended the wording of the policy should be updated to reflect this diagram, as suggested below:

Provision will be made for a mixed use development within the broad location for development to the west and east of Southbourne, as shown on the Key Diagram.

- 4.12 Previously, the Preferred Approach consultation document set out at Policy AL13 a minimum of 1,250 dwellings at Southbourne and to be identified in the revised Southborne Neighbourhood Plan. (emphasis added)
- 4.13 The Submission Plan now allocates Policy A13 for 1,050 dwellings and will be established through the making of allocation(s) in the future Site Allocation DPD or the revised Southbourne NP. This strategic allocation is to act as a mixed use extension to the existing settlement.
- 4.14 It is acknowledged that the land north of Cooks Lane (Application number: 22/00157/REM) received Reserved Matters approval in August 2022 for 199 dwellings, with the reduction in quantum of development for the BLD reflecting this committed development. A practical effect of this is that this consent will not contribute to the wider infrastructure requirements associated with a larger scale of development.
- 4.15 It is disappointing to see the phrase “*a minimum of*” has been removed. This conflicts with the flexibility set out earlier in the consultation document, and also reduces the potential of making effective use of the land for housing that will assist in meeting the overall need of the District.
- 4.16 Policy A13 prescribes a number of requirements that must be met (criterion 1 – 16). These are considerations that reflect principles of place making and sustainable development and provide a sound framework for the preparation of the allocation through either mechanism.
- 4.17 One of these requirements states that future development “*Provide[s] any required mitigation to ensure there is no adverse impact on the safety of existing or planned railway crossings.*” The existing Southbourne Neighbourhood Plan, at Objective 9, outlines the issues relating to the railway crossing and the plans for addressing this challenge in the future.
- 4.18 Related to this is the need for the provision of “*suitable means of access to the site(s), securing necessary off-site improvements (including highways) ... to promote sustainable transport options.*”
- 4.19 The combination of the requirements relating to the railway crossing and the provision of a suitable means of access show the importance of accessibility to the A27, A259 and the east-west railway line, which are the principal public transport corridors for Southbourne.
- 4.20 Development will be well connected to Southbourne via footway and cycle connections to the east and offers the opportunity to help realise the construction of a new strategic road and bridge link over the West Coastway Rail Line through provision of land and proportionate contributions to this scheme.
- 4.21 Criteria 13 ensures there will be sufficient capacity within the relevant wastewater infrastructure before the delivery of development, which addresses (for Southbourne) the identified constraints for the District in relation to housing delivery.



- 4.22 The remaining requirements of Policy A13 cover the quality and range of development, the provision of education, community and transport facilities, provision of public open space and green infrastructure, and the impact of development on the landscape. These are each appropriate considerations for the Site Allocations DPD.
- 4.23 Having regard to the above, the allocation of 1,050 dwellings for Southbourne is, in part, appropriate.
- 4.24 However, this policy should allow for the delivery of small or medium scale parcels of land, in accordance with the NPPF at an early stage of delivery of the wider allocation to enable prompt and timely housing at Southbourne whilst infrastructure upgrades are commenced. The Local Plan should identify and allocate these smaller scale sites to ensure these can come forward early in the plan period.
- 4.25 A new criteria is proposed to be included in the wording of Policy A13, stating:
- (17) To identify land for early delivery on small to medium scale sites which are not constrained by the need for a new railway crossing.*
- 4.26 Therefore, the principle of a strategic allocation for mixed use housing is considered appropriate but amendments should be made to the wording of the policy to reflect the approach to flexibility, the inclusion of small and medium scale sites, and the dispersion of development to both the west and east of Southbourne.

Southbourne Neighbourhood Plan

- 4.27 As set out in the paragraph 10.56 of the Submission Plan, development phasing is a key issue to address through the allocation of development sites for this BLD.
- 4.28 Paragraph 70 of the NPPF states that “Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites suitable for housing in their area.” Southbourne Parish Council should be aware of this when allocating the strategic sites, to ensure that there are a mix of housing sites, that could come forward sooner than the principal element of the larger strategic site.
- 4.29 Through the preparation of the Neighbourhood Plan, the Parish Council should take into account the allocation of smaller sites, which could come forward as part of and alongside the larger strategic site. This will ensure that there is not a delay in the provision of housing within Southbourne and the plan area.
- 4.30 As set out previously, the most suitable mechanism for progressing the Southbourne BLD would be the Site Allocation DPD. Whether the sites are allocated through the Site Allocations DPD or the NP, there is a requirement to identify small and medium scale site.

Land to the north of Gosden Green

- 4.31 The land under Hallam’s control to the north of Gosden Green, should either be allocated in the Local Plan as a medium scale site or should be a key component of the BLD. The site can deliver both market/affordable residential units and specialist elderly accommodation. The site will create flexibility in achieving the housing requirement of the plan area early on in the plan period.



- 4.32 The accompanying Vision Document demonstrates how as an early development parcel for the wider BLD, a series of key benefits in accordance with the 13 criteria of Policy A13 will be achieved.
- 4.33 The Proposed Submission Plan at Policy H8 identifies the need for specialist accommodation for older people and those with specialist needs. Although not set out in the Vision Document, this site can deliver, early in the plan period, much needed specialist elderly accommodation.
- 4.34 Figure 3 of the Vision Document presents the scheme's ability to connect into a wider masterplan for the strategic development, as it comes forward in the future. However, at the same time has the ability to come forward at an earlier rate being physically unconstrained and a well contained parcel of land.
- 4.35 Figure 9 provides context on connectivity, and the modal shift this scheme aims to achieve. The ability to walk to a range of services and facilities, including the train station further demonstrates the ability for the early delivery of this parcel of the BLD.
- 4.36 The impact of the highways network has been assessed for both a full residential scheme and specialist elderly housing, highlighting how the residential scheme will introduce approximately 55 new vehicles to the network at peak times, resulting in less than 1 car per minute in the peak hour. Either scheme will have a negligible impact on the highway network and would have a negligible impact on A27.
- 4.37 The site is to the south of the railway line, as previously mentioned, and would be unconstrained by the capacity constraint of the existing railway crossing.
- 4.38 For these reasons, the land under Hallam's control should be allocated within the Local Plan.



5 Conclusion

- 5.1 These representations are submitted on behalf of Hallam Land Management Limited.
- 5.2 In the context of national, local and neighbourhood planning policies, the Local Plan has an important role in providing policies and proposals for residential development to meet future needs.
- 5.3 The proposed objectively assessed need for housing across the plan area is not agreed, and the Council should review the latest transport evidence which currently do not demonstrate how there are exception circumstances, in accordance with paragraph 62 of the NPPF. The Council should also extend the plan period to ensure it meets the requirements of a minimum of 15 years in the NPPF.
- 5.4 Consistent with the established strategy to focus development in the District's east-west corridor, the Broad Location for Development to Southbourne as a Settlement Hub is, as a matter of principle, a sound proposition. Importantly the Key Diagram identifies the broad location for this development to the west and east of the settlement.
- 5.5 As discussed, there should be flexibility embedded into all strategic allocations, in particular those which are Broad Locations for Development through the use of the wording "at least". This will ensure that the "at least" quantum of housing delivery is met and affords flexibility to all housing sites coming forward.
- 5.6 The responsibility for allocating additional development land to meet this requirement has been given to either the Parish Council through the preparation of a new Neighbourhood Plan or through the Council reviewing the Site Allocations DPD. It is recommended that for the larger strategic allocations and locations the Site Allocations DPD is the more suitable mechanism for identifying land given the need to ensure that proposals are sound.
- 5.7 Whilst the scale of development proposed is strategic in nature, it is entirely appropriate to consider how different development parcels might contribute towards that and in particular early opportunities that facilitate larger scale development later in the plan period.
- 5.8 To this end, land to the west of Southbourne and south of the railway line could be allocated as the first phase of the strategic site allocation, as a medium size site, so that this southern section of the new link road is built to enable access to land to the north. This will reduce the pressure placed on the centre of Southbourne, the highway capacity on the A27, and the existing railway crossing.
- 5.9 By allocating small to medium scale sites in the Local Plan, this will bring forward development at a quicker pace and ensure that the objectively assessed needs for housing across the plan area are met each year. These can be delivered without prejudice to the larger strategic allocations and locations.
- 5.10 Currently, the Submission Plan fails to address the increasing need for specialist accommodation, with Policy H8 failing to secure specific delivery of such housing, instead moving this matter into major development schemes with no mechanism for assessing need at that stage. It is recommended that the Local Plan allocates sites for specialist accommodation.
- 5.11 Hallam control land to the west of Southbourne, which adjoins the land at Gosden Green which



has already been built. The land controlled by Hallam could be: allocated as a medium scale site within the Local Plan; included as part of the western strategic allocation of Broad Location for Development at Southbourne; or could be allocated for specialist elderly accommodation, ensuring land is readily available for development early in the plan period to address identified needs.

- 5.12 This would be consistent with the development strategy for the Plan and positively contribute towards meeting future development needs of the plan area.
- 5.13 These representations have demonstrated that in part the Submission Plan has been *positively prepared and justified*, however the key recommendations in these Representations should be followed to ensure the plan preparation accords with Paragraph 35 of the NPPF.

LRM Planning
March 2023