

Southbourne DPD Reg 19 Consultation

Reps - Settlement Gap input

Church Commissioners for England

Project:	Southbourne	Date:	30th June 2026
Purpose:	Reg 19 reps	Reference:	272817-Doc02

The Church Commissioners for England welcome the preparation of the updated Landscape Gap Assessment, Updated 2025 (LGA). In light of the changing planning context to the west of Southbourne, including recently consented development and current planning applications, it is essential that the evidence base reflects the evolving characteristics of the landscape and provides a robust assessment of the continuing role and function of the Landscape Gap between Hermitage and Southbourne.

While the updated Assessment represents a welcome review of the evidence base, the Church Commissioners consider that it does not provide sufficient detail or transparency to justify the conclusions reached in respect of either the promoted site or the wider Landscape Gap. As a result and for the reasons set out below, the updated Landscape Gap Assessment as evidence underpinning the Southbourne Allocation Development Plan Document is not considered sufficiently robust.

The council's assessment identifies that the Landscape Gap continues to perform an important role in maintaining the separate identity of Hermitage and Southbourne. The Church Commissioners do not dispute this overarching conclusion. However, the Assessment considers the Gap is of a broad scale and does not adequately distinguish between the different parts of the landscape and the varying contributions made to the function of the gap.

The Landscape between Hermitage and Southbourne is not contiguous and comprises a highly varied series of parcels with differing landscape character, visual containment, landform, vegetative structure, levels of intervisibility and relationships with the adjoining settlements. Consequently, each parcel makes differing contributions to maintaining the physical and perceived separation of Hermitage and Southbourne. Without assessing these variations at an appropriately fine-grained level, it is not possible to reach robust conclusions on the relative sensitivity of individual parcels or their suitability to accommodate development.

The Council's Assessment does not clearly explain how these differences have informed its conclusions, nor does it demonstrate why all parts of the Landscape Gap should be afforded the same level of importance in maintaining settlement separation. Most critically, it does not identify which areas are fundamental to the continued integrity and function of the Gap and which make a more limited contribution.

This issue is particularly pertinent in the context of recent and emerging development proposals.

The Assessment takes account of the consented residential development immediately north of Hermitage when considering the current extent and function of the Landscape Gap. However, it does not assess the implications of the current planning application promoted by Hallam Land for land between Hermitage and Southbourne, despite that proposal representing a potentially significant change to the spatial relationship between the settlements. The proposal is acknowledged within the DPD when considering the promoted site's performance against the Settlement Gap criterion, yet its implications for the future function of the Landscape Gap have not been evaluated as part of the Council's evidence base.

This results in an incomplete future baseline against which the promoted site has been considered. A robust evidence base should assess the cumulative implications of both committed development and significant pending planning proposals in order to understand how the Landscape Gap would function under realistic future development scenarios.

In particular, the LGA should consider whether development of the Hallam Land site would materially alter the effectiveness of the Landscape Gap in maintaining the separate identity of Hermitage and Southbourne. If the conclusion is that settlement separation would continue to be maintained, the assessment should then identify how the remaining Landscape Gap would function, including which areas would become most important in preserving a clear physical and visual break between the settlements.

These are fundamental considerations because the planning issue is not whether every part of the designated Landscape Gap must remain undeveloped, but whether sufficient land would remain to perform the strategic purpose of the designation. Without considering these scenarios, the evidence base does not provide a comprehensive understanding of the resilience of the Landscape Gap or the differing contribution made by its constituent landscape parcels.

To assist the Council, the Church Commissioners have prepared a comprehensive independent Landscape Gap Assessment, submitted previously through the Call for Sites process and updated in support of these Regulation 19 representations. The Assessment adopts a parcel-based methodology, considers the landscape at a finer spatial resolution and evaluates the varying contribution made by individual parcels to maintaining settlement separation.

Importantly, the independent Assessment tests the implications of both the consented development north of Hermitage and the Hallam Land planning application. It demonstrates that these developments would alter the configuration of the Landscape Gap and concludes that the remaining land south of the railway line performs the most important role in maintaining the physical and visual separation of the settlements and should form the principal focus of the Landscape Gap in the future. Conversely, it concludes that other parcels, including the promoted site, make a materially lower contribution and could accommodate development without giving rise to settlement coalescence or undermining the strategic purpose of the Landscape Gap designation.

The Church Commissioners therefore consider that the Council should update its Landscape Gap Assessment to assess the implications of all relevant committed and proposed development, evaluate the relative contribution of individual landscape parcels at a finer spatial scale and identify those areas that are genuinely critical to maintaining settlement separation. Until this work has been undertaken, the evidence



base does not provide a sufficiently proportionate or robust justification for the conclusions reached in the Southbourne Allocation Development Plan Document.