

RESPONSE TO THE REGULATION 19 CONSULTATION

Southbourne Allocation Development Plan Document

Prepared on behalf of Hallam Land

July 2026

INTRODUCTION

- 1.1 These representations to the Southbourne Allocation Development Plan Document – Submission Version ('DPD') Regulation 19 consultation - have been prepared on behalf of Hallam Land ('Hallam').
- 1.2 Hallam have previously made representations in response to the Southbourne DPD Regulation 18 consultation, Chichester Local Plan 2021 – 2039 ('Local Plan') Review and the Southbourne Modified Neighbourhood Plan 2014 – 2029 ('Neighbourhood Plan') Review. Hallam were represented at both the Local Plan hearing session concerning Policy A13 and previously the Neighbourhood Plan examination.
- 1.3 Hallam control the land north of Gosden Green and west of Alfrey Close ('the Hallam site'). This land was identified as a potential development location in the Regulation 18 consultation as part of Option 1 (land to the west).¹
- 1.4 In its Regulation 18 response Hallam argued that the future growth location should comprise either Option 1 or a version of Option 2 or 3 which included development west of the village and south of the railway line.
- 1.5 The current consultation document does not propose the allocation of any land to the west of Southbourne.
- 1.6 Hallam therefore objects to the consultation document in that it allocates only land to the east of Southbourne.
- 1.7 For the reasons given below, the DPD should be amended to allocate, in whole or in part, land identified in Option 1 (land to the west) so the Broad Location for Development ('BLD') would include land both east and west of the village, and specifically the Hallam land south of the railway line.
- 1.8 In this context, our representations consider the following:
 - Planning policy context
 - The Southbourne DPD Regulation 19 consultation documents including the 'Assessment Framework'
 - The merits of the Hallam site

¹ In December 2025, Hallam submitted an outline application for the development of up to 110 new dwellings on the site (ref. 25/03010/OUTEIA). The proposal includes extension of the existing means of access constructed on Main Road, active travel links to the east and west, and an extensive green infrastructure network including new landscaping and areas of accessible open space. At the time of this Regulation 19 consultation, the decision on this application is pending

- 1.9 It is instructive at this point to refer to the Regulation 18 consultation held in 2025. The Consultation Report² summarises the preferences expressed by the local community through that exercise.
- 1.10 Notably, when considering first preference, development to the west was favoured by 47% of respondents, with a further 18% preferring a mixed approach with development east and west. Only a third of respondents expressed the east as their first preference.
- 1.11 Where preferences were ranked, almost half of the respondents favoured west in the first instance. This contrasts with only a third favouring east.
- 1.12 Whilst the consultation document refers to ostensibly a finely balanced consideration between east and west, the decision-making process appears to have disregarded the outcomes of the earlier public consultation process.

PLANNING POLICY CONTEXT

- 2.1 National planning policy requires development plans to be prepared with the objective of contributing to the achievement of sustainable development (§16). They should be prepared positively, in a way that is aspirational but deliverable.
- 2.2 The tests of soundness listed at §36 apply equally to this DPD as to the Local Plan itself; to be sound, the DPD should be positively prepared, justified, effective and consistent with national policy.
- 2.3 The relevant development plan ostensibly comprises of the Chichester Local Plan 2021 – 2039 ('Local Plan'). There is also the Southbourne Modified Neighbourhood Plan 2014 – 2029 ('Neighbourhood Plan') but that does not address longer term growth required by the Local Plan.
- 2.4 **Chapter 2: Vision and Strategic Objectives** of the Local Plan establishes the overarching policy framework through setting out the priorities and vision for development across the plan area. For Southbourne, the Vision seeks to *"take advantage of the village's good transport links and existing facilities to deliver significant new residential-led development within the broad location for development which will further enhance local facilities..."*.
- 2.5 The strategic objectives for development include mitigating and adapting to climate change; protecting the natural environment; delivering well-designed and affordable housing to meet local needs; supporting a strong and diverse economy which provides employment opportunities; enabling healthy and active lifestyles; protecting heritage and character; and delivering key infrastructure.
- 2.6 Local Plan **Policy S1** sets out the spatial strategy for the district and **Policy S2** establishes the settlement hierarchy. Outside of Chichester city, the policies intend that development will focus on the two settlement hubs within the east-west corridor, being Tangmere and Southbourne. The east-west corridor benefits from good public transport options, easy access to larger scale services and also provides the opportunity to minimise impacts on the natural environment. As a whole, new development will reinforce the role of Southbourne as a centre for *"providing for a range of dwellings, workplaces, social and community facilities"*.
- 2.7 Within this context, the spatial strategy emphasises the importance of *"locat[ing] development in areas which are well located to other uses, serviced by a choice of transport modes and accessible to the communities they serve"*. This is a cornerstone of the National Planning Policy Framework ('NPPF') and its objective to promote sustainable patterns of growth (§110 refers).
- 2.8 Local Plan **Policy A13** sets out requirements for development in the BLD as identified by the DPD. The policy intends that development within the BLD will achieve a high-quality design and layout that integrates with the surrounding environment, have good access to facilities and sustainable

² https://www.chichester.gov.uk/media/41238/Southbourne-DPD-Consultation-Summary-Documents/pdf/Southbourne_Allocation_DPD_Regulation_18_consultation_summary_-_Appendix.pdf?m=1747993549297

forms of transport, and provide for an appropriate mix of housing in line with the strategic objectives.

- 2.9 The DPD is being prepared in the context of these policies and should be in conformity with them. The Neighbourhood Plan sets out a series of objectives and policies concerning land use and development within Southbourne.
- 2.10 Notably, a key concept within the Neighbourhood Plan is the establishment of a Green Ring around the village centre (**Policy SB13**).

CONSULTATION DOCUMENTS

- 3.1 Local Plan Policy A13 identifies a BLD rather than a fixed allocation or boundary area. The policy states *“The site extent, definition of the boundary, including amendments to the Southbourne settlement boundary, and detailed guidance for the development within this broad location will be established through the making of allocation(s) in a future DPD”*. The use of a BLD provides flexibility regarding the location of development. Policy A13 therefore does not prescribe that all development must be directed to one location or covered under one single allocation. It could comprise two or more locations. As such the DPD should assess and identify land at Southbourne that best contributes to the delivery of established planning policy objectives.
- 3.2 The DPD vision and objectives build on those established in the Local Plan, providing a more detailed framework to guide the allocation and development of land within the BLD. These include creating an integrated and well serviced community; delivering housing for all, promoting sustainable travel; responding positively to climate change; preserving and enhancing biodiversity and integrating development with the wider landscape. Looked at objectively, none of these objectives define or preclude particular directions of growth.
- 3.3 The DPD proposes to allocate land to the east of the village to discharge the obligation in Policy A13 of the Local Plan. This broadly corresponds with the land identified as Option 2 at Regulation 18³. The supporting evidence purports to demonstrate that this option is the preferred approach on the basis it is not within a National Landscape and can establish an effective landscape gap, can maximise access to sustainable transport and connectivity with the settlement, and would deliver an integrated community through new infrastructure provision.
- 3.4 Notably, there is no contrasting evidence to demonstrate that growth to the west could not similarly achieve these measures. The Council's assessment acknowledges that the Regulation 18 options are *“quite similarly matched in many respects....with a similar context and set of constraints”*. *“Consequently, the decision making about the preferred approach comes down to some quite subtle and nuanced judgements of the relevant issues”*.
- 3.5 This is evident from the ‘Assessment Framework’ where the differences between Option 1 and Option 2 are limited. The scoring exhibits that the majority of the assessment criteria showing either comparable scores, or only marginal advantages over one another.
- 3.6 It is instructive that the Assessment Framework in fact demonstrates that all options can deliver 800 new homes, can provide community facilities and enhancements including to the Green Ring, and active travel improvements. Where the Assessment Framework asserts that there are distinguishing constraints between east and west, - such as the Brent Geese Secondary Support Area, areas of flood risk, infrastructure constraints, and a perception of lower levels of connectivity - these only apply to land that is north of the railway line.
- 3.7 As a result, while challenges exist in developing the northern extent of Option 1, this should not preclude allocation of land to the south of the railway line where these constraints are not relevant and/or can be appropriately mitigated through the masterplanning process.

³ The land south of the railway line previously included within this option is no longer proposed to be allocated.

- 3.8 On balance, the assessment actually demonstrates that land within Option 1 is also a reasonable and deliverable allocation which would give effect to the objectives of the DPD as part of a revised Option 3 mixed scenario BLD.
- 3.9 The supporting evidence identifies a number of benefits and advantages associated with land included in Option 1 which give effect to the objectives of the Local Plan and the DPD. These are further outlined and discussed below.
- 3.10 It is instructive that bringing forward development to the west relies on just two landowners – the Church Commissioners and Hallam – both of whom are expertise in the delivery of strategic sites. The land to the east is fragmented and in multiple ownership – delivering of a comprehensive scheme and the associated infrastructure will be impeded by the disjointed landownerships.

Transport and Sustainable Travel

- 3.11 Option 1 provides the opportunity to provide good connectivity, including pedestrian and cycle routes via the Green Ring, into the existing settlement.
- 3.12 A key consideration throughout the preparation of the DPD and Option 1, has been the extent of transport infrastructure upgrades required to support the development of 800 new homes, in particular the need for a vehicular bridge over the railway line. Based on updated evidence, the consultation documents confirm that a vehicular bridge is not required to facilitate the development of 800 homes at Southbourne presently, but this is likely to be required in the longer-term. Notably land has been safeguarded for this purpose both at Parham Place and west of Alfrey Close.
- 3.13 The documents acknowledge that development to the west would not require any costly infrastructure and be in “*a healthy position in terms of viability*”. This is in comparison to development to the east which is reliant on upgrades to the Inlands Road Level crossing prior to development. This is estimated to cost approximately £6 million which will be “*challenging in viability terms*”.
- 3.14 Delivering a second crossing over the railway has been a key community objective for many years and for this reason the route along the western edge of the settlement has been safeguarded for a decade.
- 3.15 That scheme has been subject to a preliminary design and is deliverable. It provides an achievable solution to the problems brought about by a rail line running through the centre of the village. Not taking advantage and enabling the delivery of the safeguarded route by locating development that would achieve this is, in our opinion, fails to take account of infrastructure commitments and is a missed opportunity.
- 3.16 Conversely, if there is no intention of bringing forward this second crossing then Council should also declare this to be the case; revoke the requirements in the extant Section 106 Agreement to safeguard land for purpose and return the land back to the owner unfettered. This is both fair and reasonable.
- 3.17 The supporting evidence identifies perceived limitations in relation to active travel connectivity. This is not correct. The planning application submitted by Hallam proposes to improve accessibility through establishing an interconnected, internal pedestrian and cycle network, which provides connections to existing infrastructure within the wider area. Importantly these connections would strengthen east-west accessibility between Hermitage and Southbourne whilst preserving separation between the settlements with meaningful and publicly accessible green infrastructure. This effectively connects consented development to the west of Tuppenny Lane and to the development to the west of Alfrey Close, onward to the village centre and train station.
- 3.18 The application also incorporates safeguard areas of land for the provision of future access infrastructure over the railway line to connect to any future development to the north. This includes land along the eastern boundary for a vehicle bridge as part of an existing S106 agreement, and land around the existing pedestrian level crossing for a foot bridge if required in the future. It is noted that the supporting evidence incorrectly identifies this crossing as an informal crossing used to access the Bourne Community College and Leisure Centre. The crossing is an established pedestrian

level access over the railway line and the desire line to the college is not a formal Public Right of Way. Improvements to this crossing have been identified by Network Rail already. Overall, this strategy will enhance connectivity as well as safety for active travel users along the east-west corridor as identified in the Local Plan. In particular, the strategy enables greater connectivity between Southbourne and Hermitage, a key part of supporting a strong and integrated community as sought by the DPD.

- 3.19 It is noted that the supporting evidence highlights that approximately 50% of development on land under Option 1 would be within 400m of a bus stop. This is in comparison to Option 2 at only 10%.
- 3.20 The Hallam site is located within 500m from the village centre, including both the Southbourne Village Hall and Library on First Avenue, and the range of local services along Main Road. The Hallam site is also within 600m or a 10-minute walk of a 'well-connected' train station which is supported for development by planning policy. This is highly relevant in the context of national planning policy which affords a priority to locations accessible to rail stations.
- 3.21 In this context, it is not appropriate to view all land within Option 1 as having less connectivity to the village centre. Both the existing and proposed pattern of development to the west, and south of the railway line, increases overall connectivity along the east-west corridor. This reinforces the need to also consider how each site and/or parcel of land contribute to the development plan, rather than as a rigid distinction between the eastern and western options.

Integrated, well-serviced community

- 3.22 The supporting evidence acknowledges the potential to create a substantial community hub with shared education and leisure facilities centred around Bourne Community College and Leisure Centre. The assessment framework however disregards this benefit and proposes new facilities and a local centre to the east. Provision for new facilities to the east will place additional burden on existing infrastructure to the east, where one of the largest concentrations of community infrastructure in Southbourne already exists to the west. The assessment therefore cannot discount the locational merits of land to the south of this existing infrastructure and its contribution to supporting a strong and integrated community.

Housing for all

- 3.23 The supporting evidence confirms Option 1 can accommodate over the 800 homes. This comprises land both south and north of the railway line; two parcels in two separate ownerships. In this regard Option 1 can be viewed as two development nodes and the southern node can be developed independently of the northern land and without prejudicing that larger scale of development.⁴
- 3.24 The allocation of land within the BLD should consider the most effective use during both the plan period and beyond and not necessarily be bound by a single figure. This is the case with Policy H1 which directs that "*at least*" 11,484 dwellings are to be delivered over the plan period, and Policy A13 which notes "*approximately 800 dwellings*". In other words, if an option exists that provides for more than the residential requirement, this would represent a positive approach to planning.
- 3.25 In this regard the Hallam land is an entirely suitable proposition to include as a smaller scale allocation, with the ensuing benefits of prompt delivery absent the significant infrastructure constraints required by development to the east.

Environment

- 3.26 Option 1 would deliver a substantial part of the Green Ring as outlined above and established by the Neighbourhood Plan. The application submitted by Hallam has been designed around an extensive green infrastructure and open space network, in particular along the western boundary of the site adjacent to the Green Ring. This space will provide recreational opportunities, act as a landscape buffer between settlements, and create additional habitats supporting biodiversity. Notably, this

⁴ See Church Commissioners response to planning application [25/03010/OUTEIA].

provides public access for residents of both Southbourne and Hermitage to an extensive tract of green infrastructure that is presently in private ownership. This space will therefore support the further development of the Green Ring and objectives of the DPD.

- 3.27 It is noted that the Brent Geese Secondary Support Area only applies to land to the north of the railway line in Option 1. As outlined above, land not affected by this designation should also be assessed on individual merits when considering the most appropriate allocation strategy for the BLD. Additionally, it is noted that Option 1 has no impact on wildlife corridors.
- 3.28 Option 1 would include the loss of Grade 1 and 2 agricultural land. The quality of agricultural land is characteristic across the district as a whole. It is widely understood that to achieve the sustainable pattern of development that the spatial strategy is predicated on, development of best and most versatile agricultural land will be necessary. This is not a distinguishing feature between the options.
- 3.29 Available foul water treatment capacity is an issue that has been relevant previously, with flows from Southbourne being directed to Appledram and Thornham. We understand that development to the east relies upon capacity at Appledram and this was a constraint at the point the Neighbourhood Plan's intention to allocate land in that location. Development to the west drains to Thornham where there has been available capacity. This is an example of how distributing development west and east will relieve infrastructure and environmental burdens by diffusing effects.

Character

- 3.30 Option 1 has no heritage assets within the development area. This is in comparison to the land to the east where the supporting evidence confirms the allocation will impact on the setting of heritage assets.
- 3.31 The supporting evidence confirms that Option 1 can be accommodated without giving rise to unacceptable landscape impacts. As outlined above, the option presents opportunities to maintain the settlement gap between Southbourne and Hermitage and mitigate impacts on views to the Chichester Harbour and South Downs National Park. This is shown in the Hallam application which proposed a landscaped buffer along the western boundary to retain a strong open space character while contributing to the Green Ring.

CONCLUSION

- 4.1 The supporting evidence does not justify the exclusion of land within Option 1 from the allocation strategy of the BLD.
- 4.2 The differences between the eastern and western options are said to be marginal, although the clear benefit of the existing commitment to infrastructure on the western side of the settlement for which there is strong community support, is notably important and should be more prominent in the decision-making framework, if not decisive.
- 4.3 In any event, some development to the west of the settlement, specifically the land south of the railway line carries clear benefits in that it is available and deliverable and well related to key infrastructure. Given the flexibility of the BLD approach, and that there is no requirement for development to be solely confined to the east, allocating this land adds resilience and surety to the housing delivery strategy.
- 4.4 Allocating land from both the east and west, would also ensure that the delivery of 800 homes is not reliant on one development node or specific infrastructure upgrades such as the Inlands Road Level crossing, enabling development to come forward through multiple sites over the plan period.

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