

17 July 2026

**By email only**

Chichester District Council  
East Pallant House  
Chichester  
West Sussex  
PO19 1TY

Our ref: WATS3003

Dear Sir or Madam

## **SOUTHBOURNE ALLOCATION DPD REG. 19 CONSULTATION (CDC, JUNE 2026)**

Thank you for the invitation to comment on the above consultation. We write on behalf of Wates Developments, who have an interest in land east of Southbourne (the 'Site'), forming the proposed allocation under draft Policy SA1 of this DPD.

Our client has evolved their proposals for this Site in light of commissioned technical assessments, and engagement with representatives of Chichester District Council over a number of years. The outcome is a proposed allocation to be commended in principle, providing significant benefits for the area, in a highly sustainable location.

The proposed allocation of the Site presents an important opportunity to deliver a high-quality, sustainable, and integrated extension to the village, and one which aligns well with the objectives set out in adopted Local Plan Policy A13 (CDC, 2025).

Overall, the allocation represents a coherent, policy-aligned approach to growth that prioritises placemaking, environmental quality, and long-term sustainability. Wates Developments have committed to the progression of an outline planning application for this site, in parallel with its promotion through the Local Plan, further signalling their commitment to deliver this allocation in a timely manner. Early scoping on a PPA for pre-application stages will commence shortly, with the intention of drafting and submitting a planning application for this site as soon as possible in 2027.

We continue to welcome ongoing dialogue with the Council on this DPD. In the interim, we provide the following comments and suggested modifications to assist CDC prior to formal submission of the Plan.

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| Policy / Paragraph                                              | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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|                                                                 | <b>Southbourne Allocation Development Plan Document – Submission Version (CDC, June, 2026)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Policy SA1- East of Southbourne                                 | <p>Policy A13 (Southbourne Broad Location for Development) of the adopted Chichester Local Plan (CLP) requires the provision of a specific number of Gypsy and Traveller pitches and a serviced site(s) for Travelling Showpeople, in accordance with Policy H11.</p> <p>Policy SA1 (second paragraph) references Policy A13 for avoidance of duplication, before setting out additional provisions to be included in the masterplan for this site. One of these (criterion e), includes provision of Travelling Showpeople plots. Whilst it is assumed this is not over and above the requirements already set out in policy A13, it creates ambiguity, which may undermine how effective the policy is at development management stage.</p> <p>We would recommend deletion of criterion e) in light of this.</p> |
| Policy SA1 – East of Southbourne                                | <p>The requirement that future sites be delivered "without ransom strips" is not a planning matter and therefore we recommend that this is removed from the policy. Ransom strips relate to private land ownership and legal interests rather than the use and development of land, and their inclusion introduces a non-planning consideration into the policy framework.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Paragraph 5.45 – Suitable Alternative Natural Greenspace (SANG) | <p>Paragraph 5.45 currently requires provision of a 2.5km walking loop. However, Natural England's established SANG guidance (<a href="#">Natural England (2021). Guidelines for the Creation of Suitable Alternative Natural Greenspace (SANG)</a>, Appendix 1, page 6, second criterion), confirms this should be expressed as a range between 2.3–2.5km.</p> <p>Allowing for a range would help ensure the policy is justified and effective from the point of adoption. On this basis, it is recommended that the Council consider a modification to Paragraph 5.45 to reflect the SANG guidance range advocated by Natural England, thereby providing appropriate flexibility while still achieving the intended policy outcomes.</p>                                                                         |
| Paragraph 5.56                                                  | <p>We support the design-led approach to density and the principle of varying densities across the site to respond to accessibility, character and landscape sensitivities. However, the reference to an average density of "around 35 dwellings per hectare" is considered unnecessarily restrictive and potentially inconsistent with the objective of making effective use of land in line with Paragraph 129 of the NPPF.</p> <p>Given the sustainable location of the site, surrounding context, and range of uses provided, an average density of around 40 dwellings per hectare would be more appropriate. This would remain fully consistent with the proposed density range of approximately 20–50+ dph and would ensure efficient land use in accordance with national policy.</p>                      |

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|             | <b>Infrastructure Delivery Plan (IDP)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|             | The Infrastructure Delivery Plan, site allocation policy and viability assessment do not appear to be fully aligned in terms of the infrastructure requirements identified and the assumed funding responsibilities. Greater clarity is therefore required regarding which infrastructure items are expected to be funded and delivered by developers, which will be funded through strategic funding mechanisms or infrastructure providers, and how costs have been reflected within the viability assessment. This would provide certainty to developers, ensure consistency across the evidence base and policy framework, and assist in demonstrating the deliverability of the allocation.                                                                                                                                                                        |
|             | <b>Sustainability Appraisal</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Methodology | With respect to the methodology deployed by the SA to appraise the development Options and the Development Plan Document (DPD), Wates Developments remain supportive of that deployed but do request that the submitted version of the plan and specifically its supporting SA incorporate these representations and any additional evidence submitted to ensure the assessment is as accurate and robust as possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Section 4.3 | <p><u>Biodiversity</u></p> <p>Wates Developments fully support the scoring within the SA which confirms that Option 2 is the most sustainable followed by Options 1 and 3. The SA notes that all options should comply with the 10% Biodiversity Net Gain (BNG) as a minimum but that this can only be confirmed during the design phase of development. It is also important to note that only Option 2 will not lead to loss of land within the Brent Geese Secondary Support Area.</p> <p>Wates Developments are pleased to confirm that Option 2 will indeed meet the 10% BNG as a minimum and will target improvements above this where viable. We consider that this justifies the SA scoring but also that the effect should be converted to a 'Positive' from 'Uncertain' for Option 2 given the BNG commitment and lack of impact on the Brent Geese area.</p> |
| Section 4.4 | <p><u>Climate Change Adaptation</u></p> <p>Wates Developments are pleased to see significant improvements in this SA objective since the Regulation 18 version of the plan. The SA now confirms that Options 2 and 3 are considered the most sustainable with a score of 1, followed by Option 1 which is regarded as the least sustainable. The SA also records no significant effect for all three options.</p> <p>Based on the evidence within the SA, Wates Developments conclude that Option 2 should receive a significant positive score on the basis that a higher risk flood area (land south of the railway) is not included and the SPD requires all homes to be built with adaptation measures. For this reason, Wates conclude that Option 2 should receive a 'significant positive' score.</p>                                                            |

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| <p>Section 4.5</p> | <p><u>Climate Change Mitigation</u></p> <p>The SA scores all of the development options as ‘highly sustainable’ and ranks all three as a ‘1’ on the basis that all three options provide access to key services and facilities will be constructed to the high levels of energy efficiency and require the use of renewable energy technologies on each dwelling. Furthermore, it states that all three Options are close to Southbourne which has a range of services and facilities thereby reducing the need to travel by car.</p> <p>Paragraphs 4.5.2 – 4 of the Sustainability Appraisal state, with regards to Climate Change Mitigation that:</p> <p><i>“All three options have the potential to deliver development with a high environmental performance, but there are not known to be any particular site-specific opportunities.</i></p> <p><i>Transport is a focus of standalone discussion below, but in summary: All three options have the potential to support a mix of uses and facilities, minimising the need to travel and supporting modal shift, but there is a degree of concern with the proposal to deliver a new bridge under Option 1 that could encourage car use / impact objectives relating to modal shift.</i></p> <p><i>As all three options deliver the same quantum of growth, they will likely lead to similar overall emissions.”</i></p> <p>The SA suggests that a bridge would be disadvantageous to Option 1’s ability to climate change and that, in the absence of a bridge, both options are similar in terms of their impacts on the climate.</p> <p>This position is not correct. The DPD and its supporting Assessment Framework are all clear on why Option 2 should be the preferred option from the point of view of climate change mitigation:</p> <ol style="list-style-type: none"> <li>1. Option 2 is able to deliver two vehicular accesses north of the railway line. This will disperse traffic impacts (reference: Assessment Framework paragraph 6.7) and reduce traffic increases (and thus emissions) at the Stein Road level crossing (reference: Assessment Framework page 37 – Impact of development on local road network).</li> <li>2. Option 1 has only one vehicular access, meaning all traffic must access the site via Stein Road, placing additional strain on that link (reference: Assessment Framework paragraph 6.7).</li> <li>3. Option 2 is accepted as being better connected to the village of Southbourne and its station (ref: Assessment Framework paragraph 6.7), with multiple points of access from the site onto the local highway network (reference: Assessment Framework paragraph 6.4).</li> <li>4. Option 2’s masterplan, which includes multiple direct pedestrian accesses towards the village and a modal filter, will prioritise sustainable travel over car</li> </ol> |
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|              | <p>use for local trips (ref: Agreed Statement with WSCC, Section 2 paragraphs 8 and 14).</p> <p>5. By contrast, the Assessment Framework notes that, with Option 1, 'there are fairly limited opportunities to integrate the site with the rest of the village as things stand, and the only links are a long way north or a long way to the west of the main part of the village' (reference: page 35 – Providing active travel connectivity)</p> <p>Option 2 can accommodate more homes without unacceptably impacting on the highway network. Furthermore, its design has the potential to achieve a much higher take-up of sustainable travel. It should therefore be identified as the preferred site from the point of view of climate change mitigation.</p> |
| Section 4.8  | <p><u>Historic Environment</u></p> <p>Wates Developments acknowledge that there are listed buildings within all three development Options with Options 2 and 3 close to buildings on Inlands Road and Priors Leaze Lane respectively.</p> <p>Wates Developments do not believe that these heritage assets will be barrier to development and consider that suitable mitigation can be incorporated into the detailed design to ensure that development can proceed. On that basis we consider that the score for Option 2 should be reduced to a '2' from a '3'.</p>                                                                                                                                                                                                |
| Section 4.10 | <p><u>Land, Soils and Resources</u></p> <p>Wates Developments acknowledge that all three options will result in the loss of greenfield land some of which is classed as the best and most versatile (BMV) agricultural land. This impact is necessary given the lack of brownfield land and the need for affordable and private housing. It is important to note however that the Landscape Technical Note (TN) confirms that there is more high value agricultural land to the west where as to the east it is a mix of 1, 2 and 3. It is positive to see however that the SA still regards Option 2 as the most sustainable along with Option 1.</p>                                                                                                              |

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| Section 4.11 | <p><u>Landscape</u></p> <p>The SA confirms that Option 2 is now ranked the second most sustainable option with Option 3 in first place with Option 1 as the least sustainable. Wates Developments provided a detailed Landscape Technical Note (TN) from SLR Consulting with the Regulation 18 representations which demonstrated that:</p> <ul style="list-style-type: none"> <li>• The conclusion that ‘Development to the east and west of Southbourne would lead to a one-sided growth of the village’ is incorrect, and that development towards the east of Southbourne would be the most appropriate and in keeping with the existing growth. The TN states that Option 2 would ‘in fact form a balanced and cohesive spatial growth structure which aligns with the current growth pattern of the settlement’.</li> <li>• Development toward the west of Southbourne (Option 1) would ‘be breaking out into open, agricultural land which would fundamentally change the form of the settlement, whereas development to the east would be within existing low-density recent development.’</li> </ul> <p>The SA states that: <i>Option 3 is considered to perform most favourably as it would support the green ring vision; minimise concerns in respect of the National Landscape; and create a more sympathetic growth structure that allows the village to expand more equally and organically. This is followed by Option 2 and then Option 1, which is ranked least favourably because it largely falls within the identified landscape gap between Southbourne and Hermitage.</i></p> <p>It is considered that Option 2 clearly performs better than Option 1 in landscape and settlement separation terms. Wates Developments remain of the opinion that, with the evidence presented in the TN at Reg 18, Option 2 should score a ‘1’ with Option 1 being the least favourable at a ‘3’. Option 3 should score a ‘2’.</p> |
| Table 4.1    | <p>Table 4.1 of the SA summarises the scoring of the three development Options and which cumulatively result in the following scores:</p> <ul style="list-style-type: none"> <li>• Option 1 = 20;</li> <li>• Option 2 = 15; and</li> <li>• Option 3 = 17.</li> </ul> <p>Collectively these scores confirm that Option 2 is the most sustainable of the three potential development options and with the suggested enhancements in these representations further enhancing Option 2 as the most sustainable.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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| Section 5    | <p>Section 5 of the SA presents the councils reasons for selecting its preferred development option which is Option 2.</p> <p>The SA confirms that the Council consider that the performance of Option 2 against the Transport and Biodiversity objectives to be major sustainability benefits and reasons for selecting Option 2.</p> <p>With respect to biodiversity, it is noted that Option 2 will not have any impact upon the Brent Geese area which only Option 2 can guarantee. It is also noted that Option 2 is likely to deliver a more sustainable transport solution and thus encourage more modal shift.</p> <p>Wates Developments fully support the conclusions of the SA and consider that Option 2 presents the most sustainable and deliverable development option for the Southbourne Area.</p> |
| Section 7.1  | <p>The SA identified that minor to moderate negative effects are predicted in relation to air quality and transport and accessibility which arise from an increase in traffic resulting in potentially lower air quality impacts. Wates Developments acknowledge that these impacts are possible however with respect to air quality, a full assessment of any potential impacts will be undertaken in support of any planning application with appropriate mitigation identified accordingly. With respect to transport and accessibility, the SA notes that the development option chosen is ranked the most sustainable option given its accessibility to nearby services and a train station.</p>                                                                                                              |
| Section 7.10 | <p>Wates Developments note that both minor negative and positive effects will occur under the landscape SA objective which is seen as a balance between the loss of green space (negative) which are then mitigated through the sensitive landscape design integrated into the masterplan framework. The SA acknowledges that more positive benefits are likely to occur once more detailed work is undertaken on the planning application. Wates Developments fully support this conclusion and confirm that further work will be undertaken on the landscaping strategy which will provide additional positives from the proposed development.</p>                                                                                                                                                               |
| Section 7.14 | <p>Wates Development have reviewed the SA supporting the Southbourne Allocation Development Plan Document and noted that the proposed development option has been identified as the most sustainable of the three potential development options. Wates Development support the vast majority of the positive effects identified but have suggested a number of amendments to some of the SA scoring to improve the soundness and sustainability of the submitted plan.</p>                                                                                                                                                                                                                                                                                                                                         |

We trust the enclosed proves useful in finalising main and minor modifications to the plan prior to formal submission. We would welcome the opportunity to meet with Officers to discuss this further.

Yours faithfully



Laura Cornborough  
Associate Director

