Southbourne Allocation DPD

Land east of Southbourne

December 2024

Turley

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Client
Wates Developments

Our reference
WATS3003

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1. Introduction

1.1 These representations have been prepared by Turley in respect of the current consultation on the emerging Southbourne Allocation DPD (SADPD) Regulation 18 consultation.

1.2 Wates Developments have land interests in the District, including those to the east of Southbourne within the Broad Location for Development (BLD) that Chichester District Council (CDC) propose to deliver under draft Local Plan Policy A13 and which is the subject of the emerging SADPD. The emerging Local Plan has been the subject of recent Examination hearings, the outcome of which are awaited. It is anticipated that a round of consultation on proposed modifications will be required ahead of receipt of the Inspector's Report. It will be important therefore that the emerging SADPD has due regard to any changes made to the Local Plan through this process, to ensure the two are in conformity. This includes the potential for a commitment to an early review to ensure additional growth can be planned for at an early stage. Our comments on the SADPD are provided without prejudice to the submissions we have made through the Local Plan Examination process.

1.3 Alongside the draft SADPD itself, the Council have also published an Assessment Framework, Interim Sustainability Appraisal Report and Viability Assessment. These representations consider both the SADPD and the supporting documents. Due regard has also been paid to the evidence base of the emerging Local Plan where relevant to the SADPD.

1.4 Our comments have regard to national planning policy and other material considerations. At the time of consultation, the 2023 National Planning Policy Framework (NPPF) remains the current document. It is noted however that consultation on a revised NPPF was held earlier in 2024 and it is understood that a new NPPF will be formally published by the end of the year. Based on the draft transitional arrangements in the consultation version it is therefore likely that the SADPD will fall to be examined under the new NPPF and therefore once published updates may be required to the SADPD to ensure it is consistent with this.

1.5 Our representations are structured as follows:

- Section Two – Representations on the SADPD
- Section Three – Representations on the Assessment Framework
- Section Four - Representations on the Interim Sustainability Appraisal Report
- Section Five – Representations on the Viability Assessment
- Section Six – Summary and Conclusion.

1.6 The representations are supported by the following documents:

- Appendix One – i-Transport Technical Response

- Appendix Two – SLR landscape response
- Appendix Three – Vision Document.

1.7 We look forward to continuing to engage with the Council and their consultant team in the development of the SADPD and would be keen to arrange a further meeting to discuss our representations following the close of the consultation.

2. Southbourne Allocation DPD

Planning Policy Context

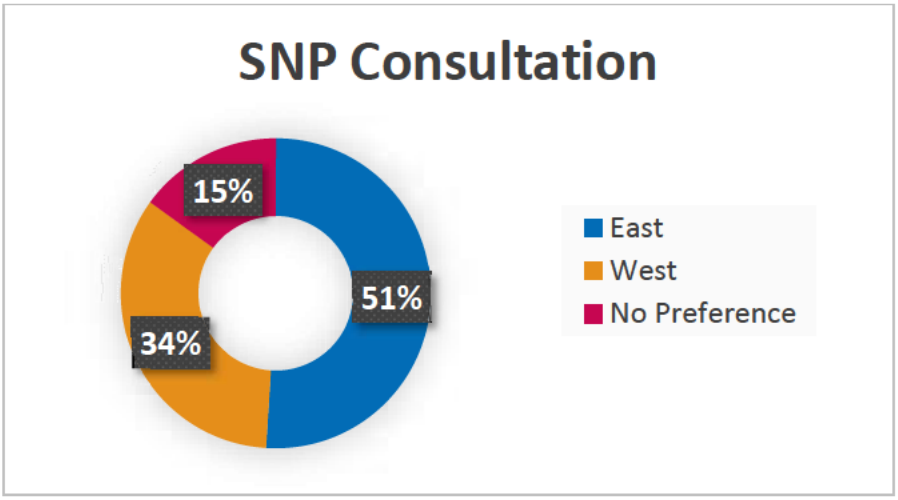
2.1 As set out in the introduction, it is important to recognise the evolving context in respect of the emerging Local Plan which is currently the subject of Examination. It will be necessary to ensure the SADPD is in conformity with the Local Plan when adopted including any modifications which may be made to the current submission version of the Plan.

2.2 Indeed, it is noted that the Council has suggested some modifications to the proposed Southbourne Broad Location for Development (BLD) Policy when submitting the Plan. These include suggested modification CM333 which proposes to alter the requirement to provide 'up to' 1,050 dwellings to a requirement to provide 'approximately' 1,050 dwellings. Whilst it is understood that the consultation SADPD has been based on the Local Plan as submitted, the outcomes of the Examination process will need to be reflected in future consultation versions of the SADPD. It is important that the SADPD does not prejudice the opportunity to explore additional growth at Southbourne, should this be required as an outcome of the current Local Plan Examination. Furthermore an early review of the Local Plan may be required, in light of the discussions at the recent Examination hearings particularly around the need for updated transport modelling work.

2.3 Importantly, the Development Plan for this area also includes the Southbourne Modified Neighbourhood Plan 2014-2019 (November 2023). The Neighbourhood Plan provides important local context and further guidance on the community's aspirations for Southbourne and future development within it.

2.4 As well as the made Neighbourhood Plan itself, it is also important to consider the wider evidence base and consultation processes that have gone into the various iterations of the Neighbourhood Plan. In particular, it is notable that the Neighbourhood Plan process has previously assessed what it considered to be the most appropriate location for growth to be accommodated at the settlement.

2.5 The February 2021 submission version of the Neighbourhood Plan included a proposed allocation (draft Policy SB2) for circa 1,050 homes to the east of Southbourne. The proposed allocation of land to the east of Southbourne was supported by a 51% community preference indicated through the NP consultation process:



2.6 Whilst the Neighbourhood Plan did not ultimately allocate the site to the east of Southbourne as had been proposed in the February 2021 submission version, this was a result of the examining Inspector (Christopher Lockhart- Mummery QC) concluding the Neighbourhood Plan should be seeking conformity with the adopted Development Plan as opposed to an emerging early draft of a Local Plan, one that had potential to alter prior to adoption (**Appendix One**). Whilst therefore the NP removed the proposed allocation, this was purely on a technical basis rather than any suggestion of any issue with the proposed allocation itself.

2.7 The previous Neighbourhood Plan process therefore provides a clear indication of community preference in relation to the location of growth at Southbourne. Whilst the SADPD has understandably, and correctly, revisited all potential locations for growth it is important that this is also set within the context of the previous work undertaken.

Supporting Material

2.8 In addition to the four main consultation documents themselves, the Council's website advises that:

"There are also evidence base documents included within the Local Plan Examination Library which are of relevance in underpinning the Southbourne Allocation DPD, which are available to view via the following link: The Local Plan examination - submission documents and evidence base - Chichester District Council. This includes a Southbourne Level Crossing Study within the Transport and Accessibility section."

2.9 We note there were considerable discussions at the recent Local Plan Examination in respect of the highways evidence base underpinning the Local Plan in particular. The Inspector's conclusions in respect of this, and any further work or updates required, will need to be reflected in the SADPD. In any event, it is noted that the work undertaken at the Local Plan level will have necessarily been undertaken at a higher level rather than solely focusing on Southbourne and will be somewhat time dated by the adoption of the SADPD.

2.10 The Stantec Report on Southbourne Level Crossing in particular is dated May 2021. Although there was a Paramics Model Update in March 2023, it is clear that the local

context has continued to evolve since this time, including in respect of local commitments.

2.11 Similarly, we note there is no Infrastructure Delivery Plan prepared in support of the SADPD and instead it is assumed reliance is placed on the Infrastructure Delivery Plan (April 2024) prepared in support of the Local Plan. It is considered that a Southbourne specific Infrastructure Delivery Plan should be prepared to inform the SADPD. This would then help to inform the Viability Assessment, our comments on which are provided in Section Five.

Vision and Objectives

Q.1 Do you agree with the vision and objectives set out? If not, please set out how you think they should be amended.

2.12 We support the proposed inclusion of a vision and objectives within the SADPD which have been informed by the Neighbourhood Plan and the emerging Local Plan. As with our above comments, any changes to the emerging Local Plan should be reflected in the SADPD.

2.13 Whilst we broadly support the SADPD Vision, we note that the Neighbourhood Plan also recognises the wider role played by Southbourne as a focal point for the Bournes area. This should be reflected in the SADPD Vision.

2.14 We note the objective in respect of "housing for all" highlights a number of different forms of housing. Notably no mention is made of the need for market housing both to meet housing needs (including for the wider area) and the role of market housing in supporting the delivery of affordable housing and other forms of infrastructure provision. The objective should therefore be updated to also refer to the provision of market housing.

2.15 As set out in the accompanying i-Transport response (**Appendix Two**), the "transport and sustainable travel" objective is overly focused on connections to the railway station. Reference should also be made to bus stops and other key amenities. Reference should be made to providing direct walking and cycling routes to multiple points of access into the site, so as to minimise walking distances and thus increase the likelihood of making trips by walking or cycling. Doing so would accord with the first two bullets of paragraph 114 of the NPPF.

Site Scenario Options

Q10. Which scenario do you feel should be selected as the preferred option for allocation?

2.16 The consultation document has considered three potential distributions of development to accommodate up to 800 homes at Southbourne. These are summarised as follows:

- Scenario 1: Land to the West
- Scenario 2: Land to the East

- Scenario 3: Mixed Scenario.

2.17 Notwithstanding our earlier comments on the appropriateness of the quantum of development considered, our comments on each of the scenarios is provided below. In summary our clients support Scenario 2: Land to the East of Southbourne subject to the comments provided below. Our clients also consider Scenario 3 to also potentially be a suitable scenario, subject to further consideration on the delivery of infrastructure and how this could be equalised across the parties.

2.18 We understand that in the continued development of the SADPD, the graphical representation of the scenarios will continue to evolve. We would note the need to ensure that all elements annotated are clearly shown in the key.

Scenario 1: Land to the West

Q2. Do you agree with the list of benefits or challenges set out above?

Q3. Are there other benefits or challenges that you think should also be included?

Q4. In this scenario, what do you think would be the challenges or issues if there wasn't a vehicular bridge over the railway line?

2.19 Whilst our clients do not have land interests in this scenario, we do wish to highlight the following matters.

2.20 The SADPD highlights that a key benefit of this scenario is that that the northern side of the site allocation could be largely facilitated by a single landowner and land is safeguarded to the south of the railway line for a potential bridge (via existing S106 agreements). The potential bridge is also listed as a benefit of the proposals.

2.21 We note however, that there are multiple landowners to the south of the railway line and indeed part of the land to the north of the railway line is owned by West Sussex County Council, and as recognised by the SADPD, further negotiation is likely to be required in respect of the bridge, including with Network Rail. This is similarly reflected in Appendix A which notes that a 'land swap' may be required to deliver the bridge footing. Further detail is therefore likely to be required in order to assess whether the bridge can be delivered and considered a benefit of the scheme. If further discussions have taken place, including with Network Rail, it is important that this is shared as part of future consultations and to inform the assessment of any financial implications so this can be factored into the viability and deliverability of this Scenario.

2.22 Detailed comments on the deliverability of the proposed vehicular bridge over the railway line are provided by i-Transport at **Appendix Two**. If the bridge were not to be delivered, further assessment work would be required to determine the quantum of development which could be achieved. This would also need to consider that if no bridge to the south is secured then demand for footpath 241, linking Scenario 1 to the A259 via an uncontrolled at grade crossing of the railway, will intensify. This is acknowledged in paragraph 5.19, which also notes that this is a 'high risk crossing, as confirmed by Network Rail.'

2.23 In the absence of a bridge, any intensification of the existing use of this crossing is likely to face objection by Network Rail. Network Rail are likely to expect a safe (grade separated) alternative, given likely increases in walking demands. Any order to extinguish the footpath, in the absence of a bridge, is likely to fail because the order making authority (Chichester District Council) will need to consider the detriment to existing users of the crossing when they come to their decision. The footpath cannot simply be taken away from existing users. The significance of this risk needs to be given appropriate weight in the SADPD decision making process. The matter is considered further in the technical note by i-Transport at **Appendix Two**, which include a case study from a development site that was similarly close to a pedestrian level crossing of a railway line.

2.24 Whilst the SADPD suggests there would be multiple opportunities to create walking and cycle connections into the existing village, as demonstrated by the i-Transport Technical Note at **Appendix Two**, there are in fact only three pedestrian routes into the site other than vehicular access points. Of these the St John's Road access would require third party land (thereby running contrary to the suggestion that the land control position is less complex); the footpath 243_1 route would need improvement from the current grassed route through a recreation ground and would again require third party land. If the St John's Road access could not be secured then the new residents would be subject to lengthy diversions for pedestrian and cycle access to many local facilities to the south and east.

2.25 With regards to the existing gas pipeline, it is noted that if development cannot be accommodated within this zone then it will push development further south and west. Whilst it is suggested that this *"could potentially push development closer to the landscape gap addressed in the Landscape Gap assessment completed for Chichester District Council in 2019"* this is considered to be incorrect. We comment on the Assessment Framework in Section Three but note that the proximity considerations identified by the Landscape Gap assessment have been incorrectly transposed onto the composite constraints map. These are correctly shown on Figure 2.2 of the Assessment Framework which clearly shows the "area for development 800 dwellings" under Scenario 1 would already encroach into the proximity considerations area. Clearly this would be further worsened if the area for development were to be pushed further south and west as a result of the pipeline constraint. Further information is also required on the relationship between the pipeline and the proposed access arrangement.

2.26 Whilst the SADPD notes that *"a landscape corridor at the western edge of this scenario will mitigate and provide a spatial and visual gap to the north of the railway line,"* at this stage it is unclear how successful such a solution would be and it is understood that no further assessment work has been undertaken to inform such an assumption. Indeed it is noted that the 2019 Landscape Gap Assessment concluded in respect of this gap that:

"It is important that the area between Hermitage and Southbourne is retained as open countryside. The gap is essential in preventing the coalescence of the settlements and maintaining their separate identities."

2.27 Furthermore, as set out in the SLR response at **Appendix Three**, any development to the west of Southbourne would be breaking out into open, agricultural land which would fundamentally change the form of the settlement. Whilst no Landscape and Visual Assessment has seemingly been prepared for Scenario 1, as noted in **Appendix Three**, there are unrestricted views potentially available to the South Downs National Park as noted at paragraph 2.16 of the Assessment Framework.

2.28 The majority of the site under Scenario 1 is identified as a Brent Geese Secondary Support Area. The Solent Wader and Brent Goose Strategy Guidance on Mitigation and Off-Setting Requirements Report (2018) makes clear in relation to such areas that *"Loss of or damage to Secondary Support Areas should be discouraged, and on-site avoidance and mitigation measures considered wherever possible. However, where impacts cannot be avoided or adequately mitigated on-site, there may be scope for a more flexible approach to off-setting the impacts to these sites, provided the continued ecological function of the network is maintained and significant enhancements additionally delivered, for example by improved long term management."* The eastern section of the BLD (Scenario 2) is not subject to this designation and as such is a clear alternative which would avoid the loss of or damage to the Secondary Support Area. The SADPD has seemingly skipped the first step of the mitigation hierarchy (avoidance) and instead focused on minimisation and mitigation. The SADPD process should be updated to follow the mitigation hierarchy and consider opportunities for avoidance before other forms of mitigation, particularly in light of the availability of other spatial scenarios which would not affect this designation.

2.29 In light of the above, the benefits and challenges in relation to Scenario 1 should be updated, including the summary text, in order to accurately reflect the comments provided above.

Scenario 2: Land to the East

Q5. Do you agree with the list of benefits or challenges set out above?

Q6. Are there other benefits or challenges that you think should also be included?

Q7. In this scenario, what do you think would be the challenges or issues if there wasn't a vehicular bridge over the railway line?

2.30 Wates support Scenario 2 and consider this to be the most appropriate solution to accommodate additional growth at Southbourne.

Benefits

2.31 As identified in the SADPD this scenario would include a series of benefits. In addition to those stated we would highlight the following:

- Strong connectivity to the existing settlement by pedestrian and cycle by a number of potential routes which are not reliant on third party land.
- Cycle improvements on Cooks Lane can be provided, enhancing links to the railway station.

- Development would deliver the eastern section of the Green Ring which would benefit from easier access by existing residents as a result of the strong connectivity identified. This would form part of the substantial open space proposed under Scenario 2 which would retain a landscape corridor to the wildlife area to the east and has the ability to integrate existing water courses within a blue and green infrastructure strategy such as linking with the existing Ham Brook watercourse (rare chalk stream). This area is well located for providing a development buffer as well as strategically linking with the Southbourne Parish 'Wildlife Corridors' which run in a north to south direction, to the west of Hambrook.

- Built development would not be located in the gap from the Landscape Gap Assessment and would not result in perceived coalescence of settlements.

- Development would form a balanced and cohesive spatial growth structure which aligns with the current growth pattern of the settlement. Current consented residential schemes and Scenario 2 would serve to form an extension that continues to 'infill' gaps in the urban form as well as linking with existing good transport corridors (see **Appendix Three**).

- Development would not impact Brent Geese Secondary Support area.

- Land to the east contains a mix of Grade 1, 2 and 3 agricultural land.

- There are fewer existing PRoWS on the east of Southbourne, with therefore more opportunities to improve connectivity into the wider landscape.

- The proposal is less reliant on a bridge than Scenario 1 with a greater quantum of development capable of being delivered in advance of the provision of any bridge.

- Vehicular accesses have been agreed in principle with West Sussex County Council in respect of South Lane and the A259 Main Road. See **Appendix Two** for further details.

- Growth to the east of Southbourne has the benefit of previous community support through the earlier Neighbourhood Plan process.

Challenges

2.32 Our comments on the stated challenges in relation to Scenario 2 are as follows:

- Based on our previous assessment work we understand that access to the site would not be prevented by the gas pipeline and that the pipeline easements would not preclude the works proposed (access etc) taking place. Whilst it is considered that vehicular access can be provided without infringement on the gas pipeline, in the event that access is required over it previous correspondence with SGN by RSK has advised that it will be permissible for roads to cross the pipeline, at right angles wherever possible, and with suitable protective measures in place.

- It is considered that the reliance on the vehicular bridge is overstated. Scenario 2 could provide an alternative access north of the railway line (via Inlands Road) and a larger amount of land south of the railway. This means that Scenario 2 is less reliant on the bridge than Scenario 1. The challenges section should clarify this. Furthermore, the current live planning application (24/01161) is yet to be determined by the Council.

- Paragraph 5.30 of the Consultation document raises concerns regarding the intensification of use of the Inland Road level crossing. Inlands Road has much lighter traffic flows than Stein Road, and only a small proportion of development traffic would use Inlands Road, and a single arm crossing. The issue at Inlands Road is therefore one of safety rather than capacity. Development at Scenario 2 provides an opportunity to introduce double barriers and therefore address this concern, whilst alleviating additional pressure on the Stein Road crossing. Paragraph 5.30 should be reworded accordingly. It is of course fair to say that the impact of development on the operation on the level crossings will need to be assessed. However, Inlands Road is not the key constraint.

- Paragraph 5.31 suggests that the South Lane access is not appropriate in view of width and hedgerows and requires further technical work. This work has been undertaken. An access has been designed and subject to a safety audit and agreed in principle with WSCC. Further details are provided in **Appendix Two**.

- All three scenarios involve multiple landowners. Whilst it is noted that planning applications have already started to come forward for development it is considered this provides further justification for Scenario 2 in ensuring a logical new eastern boundary to the settlement is created, with supporting infrastructure and new homes. The SADPD will ensure a coherent solution to development to the east of Southbourne comes forwards. Wates control the majority of the land to the east and are an experienced land promoter with a significant track record of delivering this scale of development

- A small proportion of the land to the east is at risk of flooding (indeed this applies to all three Scenarios). Wates have commissioned further technical work on a range of matters, including in respect of flood risk, in support of Scenario 2 to provide further technical reassurance that this would not preclude development in this location. Based on work undertaken to date it is understood that the areas at risk of flooding are not an in-principle constraint to development and can be addressed through appropriate technical solutions and/or masterplanning of the site.

  Furthermore, the representations from i-Transport confirm that there are different options for the provision of access into the site and that one such access point (South Lane) has already been agreed in principle with the local highways authority. If flooding were to restrict the construction of the bridge (Wates Developments consider all risks can be mitigated), then other access routes into the site are available that are not impacted by flooding thereby eliminating development risk on this specific issue.

As set out in the introduction we are keen to meet with the Council following the close of the consultation to further discuss our submissions and to agree the timescales for sharing any additional information prior to future consultation on the SADPD.

2.33 The conclusions in relation to Scenario 2 should be updated to reflect our above comments.

2.34 Draft Policy SB2 of the Submission Southbourne Neighbourhood Plan (February 2021) included proposed policy wording for the allocation of land east of Southbourne Village for development. This included a series of requirements to ensure the delivery of key components and recognised the additional technical work required to confirm the appropriate delivery of these, including timings. Whilst clearly some updates will be required to reflect the latest position, it is considered this would form a useful starting point in drafting the proposed allocation policy in the SADPD.

Scenario 3: Mixed Scenario

Q2. Do you agree with the list of benefits or challenges set out above?

Q3. Are there other benefits or challenges that you think should also be included?

2.35 Given the nature of Scenario 3, where relevant to Scenario 3, our earlier comments in respect of Scenarios 1 and 2 should be reflected in the assessment of Scenario 3. As noted above, our client's consider Scenario 3 to also potentially be a suitable scenario, subject to further consideration on the delivery of infrastructure and how this could be equalised across the parties. We provide further comments on the specifics of Scenario 3 below.

2.36 It is noted that Scenario 3 proposes the location of the new primary school to the east of Southbourne as in Scenario 2. The SADPD notes the potential beneficial effects of distributing traffic across the village by spreading the educational facilities within Southbourne and connectivity to the Green Ring. We do not repeat our earlier comments but note that further technical assessment work may be required to support the SADPD from a highways perspective. As per our earlier comments, land to the east benefits from significantly more pedestrian and cycle connections into the existing settlement which will enhance the accessibility to both new and existing services and facilities. A proportion of the proposed new homes would therefore benefit from this greater connectivity to the east, compared to Scenario 1 which would only have the more limited connections.

2.37 Scenario 3 is suggested to not require the delivery of a multi-modal bridge. It is likely that additional evidence will be required to demonstrate this is the case, noting that in particular Scenario 3 would result in a significantly higher number of vehicles travelling down Stein Road. Our previous comments in relation to the delivery of the footbridge to the west also apply to this Scenario and are expanded on at **Appendix Two**. As with Scenario 1, further information is also required on the relationship of the proposed access and the pipeline. We note that our information indicates that the access road to the east would not be impacted by the pipeline with little loss of development area so

this does not represent a constraint to the proportion of growth which could be accommodated to the east.

2.38 We disagree with the assertion that Scenario 3 would create a more balanced spatial growth pattern that is aligned with the shape and form of Southbourne. This is inconsistent with the statement in 2.16 and 2.17 of the DPD that settlement form is more compact to the west, but that recent development has already expanded from the eastern side of the village. Whilst Scenario 3 would result in a reduced scale of growth to the west, it is important to recognise that any development to the west of the village would be breaking out into open, agricultural land which would fundamentally change the form of the settlement. In contrast development to the east would be in the direction of existing low density development, meaning that the overall form of the settlement would not change substantially. Current 'consented' residential schemes and the eastern scenario development proposals would serve to form an extension that continues to 'infill' gaps in the urban form as well as linking with existing good transport corridors. As such, it is considered that the assertion that Scenario 3 would create a more balanced spatial growth pattern is not reflective of the evidence. It is noted that Scenario 3 would continue to deliver some of the benefits of 'infilling' gaps in the urban form to the east which would not be achieved under Scenario 1.

2.39 It is noted that this scenario is stated to *"retain flexibility for future growth of the village if required."* The accompanying Figure for Scenario 3 does not include a proposed gap annotation (our assumption of the meaning of the green annotation although not identified on the key) to the west of the settlement as shown in Scenario 1. It is understood that proposed gaps are to be included in the DPD, however it is unclear whether this is under all scenarios. Furthermore, it is considered that all three Scenarios potentially retain flexibility for future growth whilst allowing comprehensive masterplanning through the DPD process rather than resulting in an onion skin approach to the growth of the settlement. This is particularly imperative in light of our wider comments on housing growth and the likely need for additional growth to be brought forward at Southbourne.

3. Assessment Framework

3.1 The consultation is accompanied by an Assessment Framework (September 2024) which forms Appendix A to the SADPD. Our comments are structured to follow the structure of the Assessment Framework.

Site Context

3.2 Chapter 2 of the Assessment Framework sets out the site context in respect of the Broad Location for Development (BLD). Whilst much of the information presented is factual and therefore on which we have no comment, we would highlight the following.

3.3 To aid clarity it is suggested that Figure 2.2 is updated to also reflect consented development which sits outside the settlement boundary and the BLD. Currently it would appear that growth to the east of the settlement would be disconnected which is not an accurate reflection of the context.

3.4 Figure 2.5 represents the different land ownerships within the BLD. Whilst this is understood to be an accurate reflection of ownership this does not necessarily depict wider agreements that are in place between landowners. Specifically, we can confirm that in addition to the orange parcel which forms the majority of the eastern part of the BDL, Wates also control the pale green and southern blue parcel in the eastern BLDAs such, whilst it is recognised that there are additional parcels outside of the control of Wates Developments, the majority of the land to the east of Southbourne is under their control.

3.5 Whilst the proposed green ring will be primarily a recreation route, it is considered that it should also be referenced in the 'connectivity network' section given the opportunity it presents and the community support which it has as well as its status in the Neighbourhood Plan.

3.6 It is considered that the BLD boundary should be shown as a red line on Figure 3.0 Constraints Map for consistency with the other figures.

3.7 It is noted that a noise buffer 60dB is annotated on the constraints plan. This is based on assessment work undertaken by Wates and supplied to the authority. It is considered this should be shown as an indicative constraint as clearly this will require further testing (including for the land outside of Wates control) as detailed proposals are developed. At this stage it is unclear whether the LPA are intending to undertake such additional work themselves in developing the next version of the SADPD.

3.8 Whilst the overhead power line is shown on the constraints map, the route of the gas pipeline is not identified. We would suggest this is updated to include.

3.9 Whilst the proximity considerations shown on Figure 2.2 Built Form and Heritage are consistent with the Landscape Gap Assessment (May 2019), these are then not replicated on Figure 3.0 which instead shows smaller areas for these. It is considered that the proximity considerations from Figure 2.2 must be accurately reflected on

Figure 3.0. If alternative evidence has been prepared to support the revised proximity consideration areas shown on Figure 3.0, these must be published as part of the evidence base to support the current consultation. At the current time it is unclear whether the development scenarios have been informed by inaccurate information in Figure 3.0.

3.10 With regards to the opportunities and constraints identified, we would further highlight the following:

- The eleventh bullet identifies both the Inlands Road crossing and the western PRoW crossing as being "unsafe and uncontrolled pedestrian rail crossings." The Inlands Road (all mode) crossing has barriers which drop when a train is approaching, thereby alerting pedestrians not to cross. It is only the crossing of footpath 241 which is completely uncontrolled. The issue at Inlands Road can be addressed much more easily - with double barriers, which development at Scenario 2 could fund. Similar schemes have been implemented elsewhere in West Sussex and there is no reason why the same could not be done here. The constraint should be reworded accordingly. Further information is provided in the i-Transport response at **Appendix Two**.

- The final bullet and constraints notes 'multiple landowners in the east' as a constraint but does not acknowledge the land ownership issues that could arise as a result of the multiple third-party land to the west, for example the parties involved in the delivery of a pedestrian link through the college or of the bridge to the south. This should be acknowledged and given equal weighting in the assessment process. Furthermore, our comments in relation to the land control to the east have been discussed above.

- Whilst the opportunities are noted in respect of improving north-south mobility within the village, this should also recognise the opportunity to bring forward a development with multiple points of pedestrian and / or cycle access both to the village and across the railway line which is a significant parameter on which the suitability of each scenario should be assessed. Our comments on the accessibility of Scenarios 1 and 2 have been discussed in Section Two and as such are not repeated here.

Infrastructure Requirements

3.11 Whilst we do not wish to repeat our earlier comments, we would recommend that a Southbourne specific Infrastructure Delivery Plan is prepared in support of the next consultation on the SADPD. This would provide greater certainty and reflect the current position in order to inform the viability testing.

3.12 A series of infrastructure requirements are noted in Section Three. We would highlight that these are likely to vary depending on the quantum of development to be accommodated in the BLD, which in itself is dependent on the current Local Plan Examination process. These requirements may therefore vary and will need to continue to be reviewed through the evolution of the SADPD.

3.13 It is noted that whilst the majority of the identified infrastructure requirements are consistent with the Local Plan Infrastructure Delivery Plan (LP IDP), there are some discrepancies and ongoing uncertainties. In particular we note:

- The LP IDP only noted the need for provision of improved bus services and bus stops in respect of transport infrastructure. It is clear that the SADPD identifies a number of other requirements. It is important that these are justified and have been factored into the viability assessment of the options. Proposals will need to be worked up in further detail through discussions with West Sussex County Council in particular.

- There remains uncertainty on the need for an expansion of Bourne Community College for both secondary and sixth form provision.

- It is unclear what the need for the potential replacement of the Age Concern building is, how this is directly related to the development and how the relevant tests will be met. Further information is required on this element.

- We have commented through the Local Plan Examination on the proposed requirements in respect of custom and self-build housing, and gypsy and traveller pitches and plots for travelling show people. The SADPD will need to respond to the Local Plan Inspector's comments on these points.

- We would note the role that the green ring provision will have in meeting the wider open space requirements and consider these two requirements may be more appropriately addressed as a single requirement to ensure they are considered holistically.

3.14 With regards to the delivery of these infrastructure requirements, we do not repeat our comments provided in Section Two. We comment separately on how the LP IDP has informed the viability appraisal in Section Five.

Assessing the Options

3.15 Chapter 4 sets out how the options have been assessed. We note that initial community engagement is stated to have already taken place. It is assumed that future consultation versions will include a summary of consultation feedback received and how this has fed into the SADPD.

3.16 With regards to establishing the Assessment Framework, it is considered greater clarity is required as to how the comparative tables of shared objectives have been created. We note, by way of example, Figure 1 currently identifies shared objectives between Local Plan objective 1: Climate Change with Neighbourhood Plan objectives 1 and 4, but not with 5 which is *"adapted and prepared for climate change and zero carbon living."* As Figure 1 has then fed into Figure 2, this lack of clarity is further compounded.

3.17 Our comments on the DPD objectives have been provided in Section Two and as such are not repeated here. The objectives are however expanded on in the Assessment Framework and we make the following observations:

- Whilst it is recognised that the creation of a "Heart for Southbourne" is a local community aspiration and the dispersed nature of facilities has been identified, as discussed in Section Two there are various options for how this could be addressed which do not necessarily require the co-location of uses. The connectivity between the facilities (both new and existing) will be a key consideration.

- Our comments on the quantum of housing proposed are addressed elsewhere and as such are not repeated here.

- The assessment methodology should not only consider the location of the site in relation to existing bus stops. It should also take account of:

  (i) Walking distance to nearest high frequency (as a minimum, hourly) bus services.

  (ii) Quality of walking routes to the bus stops.

  (iii) Quality of bus stops.

  (iv) Number of vehicular access points into site and likelihood of delivering a new or extended bus service (for example by designing a suitable road network).

Assessment Framework

3.18 In light of the above, it is considered the conclusions of the site assessment framework require updating. Whilst this does not relate to all assessment criteria, where changes are recommended, the relevant row of the Assessment Framework table is provided below including the suggested updated text and scoring for the affected Scenario(s). This has been informed by the work of i-Transport at **Appendix Two** and SLR at **Appendix Three**. The Vision Document at **Appendix Four** demonstrates how Scenario 2 could be delivered.

Assessment Criteria	Scenario 1 (West)	Scenario 2 (East)	Scenario 3 (Mixed)
	Integrated, well-serviced community		
Support delivery of improved connectivity within the village as a whole with good integration between new and existing community.	The educational land creates a barrier to movement and integration between new development and existing village. There are limited opportunities for connectivity between the new and existing community as demonstrated in **Appendix Twi**.	As demonstrated in **Appendix One**, land to the east benefits from a number of options for connectivity between the new and existing community.	Whilst the benefits identified are noted, the challenges identified in relation to Scenario 1 are also applicable and this should be reflected.

Housing for all			
Utilities pipeline impact on-site capacity	A greater percentage of on-site development area could be impacted by the gas pipeline as available land is pushed toward the landscape corridor.	Our information indicates that the access road would not be impacted by the pipeline with little loss of development area.	Greater percentage of area north including space for access road is covered by consultation zone.
Site capacity to meet 800 homes delivery requirement.	As discussed in **Appendix Two**, there is uncertainty on the delivery of the rail bridge which could become a constraint for delivery. The site is also subject to a number of other constraints as discussed elsewhere which are likely to constrain capacity.	As set out in **Appendix Two**, it is anticipated that upgrades can be secured on Inlands Road which would ensure this is not a constraint to delivery. The site also benefits from a range of access options. The accompanying Vision Document at **Appendix Four** demonstrates how the site could be brought forwards.	No additional comments.
Transport and sustainable travel			
Providing active travel connectivity.	Only one point of connection north of the railway for active travel has been secured, as delivering and / or improving additional access points will require third party land. If the rail bridge is not secured, there are significant safety concerns regarding the uncontrolled pedestrian crossing of the railway line.	There are numerous (eight) points of pedestrian and / or cycle access via rights of way and extensive site frontages onto public highway land.	Risks associated with the footpath across the railway line (241) could be mitigated with a reduced quantum of development in the western part of the parcel.
Potential for a bridge crossing the railway for pedestrians and cyclists.	The bridge across the railway into Scenario 1 has not been secured and will require further negotiation including with Network Rail. It will be needed before any housing can come forward. An extinguishment order to close the footpath is unlikely to succeed.	Whist a road bridge is not secured, land is safeguarded under planning application (ref. 24/01161) for the footing for a pedestrian and cycle bridge.	Potential to deliver pedestrian cycle bridge to the east, and possibly the west, dependent upon the land swap.

Potential for a bridge crossing the railway for vehicles.	Requires land swap to deliver a vehicular bridge and agreement of terms with Network Rail.	Requires landowner collaboration to deliver a vehicular bridge and agreement with Network Rail.	No vehicular bridge proposed.
Influence of vehicular bridge on traffic congestion.	Providing a vehicular bridge would address congestion issues on Stein Road.	Providing a vehicular bridge (where required) could address congestion issues on Stein Road. Development also provides the opportunity to upgrade the Inlands Road crossing to a double barrier.	Will not alleviate congestion but any development on both sides will need to come forward in such a way that they do not trigger unacceptable or severe impact on the level crossing (ref: NPPF paragraph 114).
Development within 400m of a bus stop.	The closest bus stop to the site only serves the school. The site will thus be reliant on bus services on the A259 Main Road, over 1.5km away via existing walking routes.	The site is closer to the closest high frequency services on the A259 (around 1.3km). The footbridge will reduce this for many residents. Access on Inlands Road and South Lane provide an opportunity to provide a new loop service into the site, even without a road bridge.	The site will be reliant on bus services routing via A259 Main Road. The bridges, if delivered, will help reduce this. There are risks to delivery of a western footbridge. A loop road could serve the eastern part of the site.
Improvements in pedestrian / cycle access to the train station.	Limited opportunity to improve pedestrian / cycle access to and from the railway station. Pedestrian links into site need third party land.	Opportunity to improve access to the station through enhancements to Cooks Lane.	Opportunity to improve access to the station through enhancements to Cooks Lane using the land to the south. Risks to delivery of pedestrian accesses to the west will increase walking distances from the western side of the allocation.
Development located within 15 walking distance from station.	The site is only able to meet this requirement should third party land be available to form a walking route.	This site meets the requirement.	This site meets the requirement.
Environment			
Development sites to provide sufficient open	No additional comments.	The open space provision for Scenario 2 is strategically located for	No additional comments.

greenspace (in line with policy).		providing a development buffer as well as linking with the 'Parish Wildlife Corridors' (Southbourne Parish Neighbourhood Plan Policy SB14 – Biodiversity Policy Map). As demonstrated by the Vision Document at **Appendix Four**, the site could provide in excess of policy requirements for open space.	
Protect and / or mitigate existing wildlife and biodiversity.	The significant loss of land of Brent Geese Secondary Support area is noted. Whilst it is suggested that offsite mitigation could be provided, we are not aware of any commitment to this or how it would be secured. Furthermore in accordance with the mitigation hierarchy, the potential to avoid the impact in its entirety should be pursued in the first instance.	Scenario 2 would result in no loss of Brent Geese Secondary Support areas. As discussed above, the open space provision for Scenario 2 is strategically located for providing a development buffer as well as linking with the 'Parish Wildlife Corridors' (Southbourne Parish Neighbourhood Plan Policy SB14 – Biodiversity Policy Map). As noted in the Council's assessment, any impacts on existing hedgerows and orchards, and any existing ecological constraints, could be integrated and mitigated through design.	No additional comments.
Impacts to agricultural land.	As figure 2.4 of the DPD shows there is more agriculturally high value grade 1 land to the west, whereas land to the east is a mix of 1, 2 and 3.	As figure 2.4 of the DPD shows there is more agriculturally high value grade 1 land to the west, whereas land to the east is a mix of 1, 2 and 3.	As figure 2.4 of the DPD shows there is more agriculturally high value grade 1 land to the west, whereas land to the east is a mix of 1, 2 and 3.
Character			
Impact on views to and from Chichester Harbour National Landscape (CHNL) and South Downs National Park (SDNP).	No LVA appears to have been undertaken for the site, so impacts are currently unknown although it is noted that paragraph 2.16 highlights	As set out in **Appendix Three**, an LVA was carried out in 2020 which has identified there would be a moderate/minor impact on the setting of the SDNP	As with Scenario 1, the evidence base to reach this conclusion is not yet available.

	that 'The openness in character of the west is also attributed to unrestricted views to the north to the South Downs National Park.' Further assessment work is required to understand if impacts can be reduced or mitigated and at this stage it is not considered possible to conclude this.	and Chichester Harbour National Landscape (CHNL). However, the report also states that the scale of change in views from the SDNP is generally slight or negligible, and consequently the overall visual effects are likely to be moderate at most and often minor. In fact, the availability of open and unobstructed views are generally very restricted. Effects on the CHNL are also likely to be minor or less, since the proposed development would be largely screened by existing buildings and vegetation. Only very locally direct effects are reported to the CHNL which are caused by the southern site entrance (which is adjacent to the northern boundary of the CHNL). The Vision Document at **Appendix Four** demonstrates how impacts can be reduced and/or mitigated.	
Retention of landscape gaps between villages / settlements.	Site is entirely within the landscape gap. It is not clear what assessment work has been undertaken to conclude a 100m landscape gap is the appropriate mitigation, or indeed whether this will be successful.	Whilst a small section of the site is located within the landscape gap, importantly this is proposed as open space and not built form so will continue to function as part of the landscape gap. As set out in **Appendix Three**, an LVA was carried out in 2020 which reviewed the Chichester District Council's Landscape Gap Assessment (May 2019).	No additional comments.

		These conclusions have informed the Vision Document at **Appendix Four.**	
Growth of the village sympathetically to its existing form and structure.	Any development to the west of the village would be breaking out into open, agricultural land which would fundamentally change the form of the settlement.	As discussed previously and expanded on at **Appendix Three**, it is not considered that Scenario 2 would lead to 'one-sided growth of the village' and would in fact allow a sympathetic growth structure of the village based on a number of criteria.	No additional comments.
Deliverability (land) considerations.	As per our earlier comments, there remains significant uncertainty on the deliverability of the railway crossing with further negotiation required including with Network Rail.	No additional comments.	No additional comments.
Deliverability (viability) considerations.	No additional comments.	No additional comments.	Given the increased complexity associated with further landowners under this scenario, it is considered that this should be similarly scored.

4. Interim Sustainability Assessment

4.1 This section of the representations presents the outcomes of a review of the Sustainability Appraisal (SA) Document supporting the Southbourne Allocation Development Plan Document (DPD).

4.2 It is acknowledged that this is a Regulation 18 version and so is still evolving, however Wates Developments consider the SA process and the current SA documents to be extremely important parts of the plan making process in that the SA provides crucial evidence to guide the plan making process to the most sustainable policy option.

4.3 Wates Developments have reviewed the SA document and have a number of comments and suggestions to make which we hope will be incorporated into the Regulation 19 version of the plan and which will result in the selection or the most sustainable 'reasonable alternatives' (policy option).

4.4 The function of the SA document is to appraise the three reasonable alternative policy options for development within the Broad Location for Development (BLD). Our comments on the quantum of development assessed have been provided separately and as such are not repeated here. The three options (referred to as scenarios in the wider consultation documentation) are:

- Option 1: Land to the West of Southbourne village
- Option 2: Land to the East of Southbourne village
- Option 3: Mixed Scenario (combining areas of land to the west and to the east of Southbourne village)

4.5 As stated earlier in these representations, Wates Developments consider Option 2 to be the most suitable Scenario. Our clients also consider Scenario 3 to also potentially be a suitable scenario, subject to further consideration on the delivery of infrastructure and how this could be equalised across the parties.

The Methodology Deployed by the SA

4.6 With respect to the methodology deployed by the SA to appraise the development Options, Wates Developments are broadly supportive of that deployed but do request that the Regulation 19 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.

Appraisal of the growth scenarios

4.7 Section 3 of the SA presents the results of the appraisal of the three growth options against the SA Framework with a summary of the results presented in Table 3.1. Wates Developments have reviewed the appraisal and consider that there are areas where the scores can be updated to reflect more accurate information available publicly or

provided in these representations by the design team. Our comments are provided below.

Air / Environmental Quality

4.8 The SA identifies that Option 1 is the most sustainable followed by Option 2 and 3. Wates Developments note that the SA considers that Option 2 could utilise the 'existing multi-modal crossing across the railway line via Inlands Road and provides a multi-modal bridge and a pedestrian / cycle bridge. However it is recognised that the existing crossing is considered unsafe by Network Rail, and access off the end of South Lane could be constrained due to the character and nature of this historic lane'.

4.9 i-Transport have provided representations to this consultation which summarises the potential access solutions for Option 2. Paragraphs 1.7, 1.12 -1.13 note that Option 2 is closer to the services and facilities in Southbourne and therefore likely to promote more cycling and walking. Furthermore it notes that Option 2 could deliver a higher quantum of development without the need for a bridge due to it having more land for housing south of the railway line (most development traffic will route south to the A259) and due to it having the potential for access via Inlands Road, thereby avoiding the Stein Road crossing .

4.10 We are unaware of any evidence to support the contention that South Lane is a 'historic lane' and would request any evidence is shared so this can be appropriately assessed.

4.11 Wates Developments believe that this additional evidence further supports the scoring identified by the SA for the Air / Environmental Quality SA objective and that it should be converted from an 'Uncertain' significant effect to a 'Positive' effect in relation to Scenario 2.

Biodiversity

4.12 Wates Developments fully support the scoring within the SA which confirms that Option 2 is the most sustainable followed by Option 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.

4.13 Wates Development are pleased to confirm that the Option 2 and indeed the Wates controlled part of Option 3 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 effects should be converted to a 'Positive' from 'Uncertain' for all three development Options.

Climate Change Adaptation

4.14 The SA notes that Option 2 is considered the least sustainable with a score of 3, followed by Option 1 with Option 3 regarded as the most sustainable.

4.15 To justify this scoring the SA notes that 'Options 1 and 2 are considered likely to lead to significant negative effects as they contain areas of high surface water flood risk in key locations with regard to access'.

4.16 Wates Developments acknowledge that Options 1 and 2 do contain potential areas of flooding however it is important to note that the representations from i-Transport confirm that there are different options for the provision of access into the site and that one such access point (South Lane) has already been agreed in principle with the local highways authority. If flooding were to restrict the construction of the bridge (Wates Developments consider all risks can be mitigated), then other access routes into the site are available that are not impacted by flooding thereby eliminating development risk on this specific issue.

4.17 Based on this evidence, Wates Developments conclude that Options 1 and 2 should receive the same score of '2'.

Climate Change Mitigation

4.18 The SA scores all of the development options as 'highly sustainable' on the basis that all three options will be constructed to the Future Homes Standard 2025 which will set very high levels of energy efficient 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.

4.19 Wates Development fully agree with the commitment to the FHS 2025, however with respect to the access to key services and facilities we would like to refer the Council to Table 3.1 of the i-Transport representations which demonstrate that Option 2 is significantly closer to a number of key services and facilities than Option 1 such as; Southbourne Village Hall, Tesco Express, Southbourne Social Club, Southbourne Junior and Infant School, Southbourne Surgery, the Railway Station and the Industrial Estate (for employment opportunities).

4.20 On this basis of this evidence, Wates Developments consider it reasonable to reduce the Option 1 score to a 2 and leave Options 2 and 3 at the most sustainable with a score of 1.

Communities and Health

4.21 Wates Developments fully support the scoring of the three options under this SA Objective. Whilst we note that each option has different characteristics and strengths, it is without doubt that each option will result in significant positive benefits to the local community.

4.22 It is also relevant to note that Scenario 2 benefits from easier access to the existing doctors surgery and greater footpath / cycleway connections to services and facilities thus contributing to a healthier lifestyle. The Scenario will also benefit from the future delivery of a new children's nursery as part of the consented Metis scrapyard scheme.

Economy and Employment

4.23 Wates Developments note that the SA scores all three options as 'highly sustainable' with respect to this SA objective. To support this the SA notes that 'Option 1 would facilitate the greatest number of new homes within proximity to local employment opportunities' which are identified as the nearby industrial village. Given the scale of the sites in question, different parts of each site will be located in closer proximity to

the employment opportunities than other. It is therefore considered all Options should be scored a 1.

4.24 Table 3.1 of the representations from i-Transport confirms that Option 2 is c 500m closer to the Southbourne Industrial Estate than Option 1 thereby providing a greater benefit in terms of access to employment opportunities. With this evidence, Wates Developments consider that the score for Option 1 should be reduced to a '2' with Options 2 and 3 remaining as a '1'.

Historic Environment

4.25 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.

4.26 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 3 should be reduced to a '2' from a '3'.

Housing

4.27 Wates Developments acknowledge that all three options are intended to deliver up to 800 new affordable and private dwellings which supports the SA scoring all three Options with a significant positive effect. As stated earlier in these representations however, Wates Developments consider that Option 2 has the potential to deliver higher numbers on site.

4.28 At this stage of the assessment however, Wates Developments agree that all options should score the same high score.

Land, Soils and Resources

4.29 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 unfortunately 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.

4.30 As with heritage assets, any loss of BMV land can be mitigated through good design such as locating green infrastructure upon this asset to ensure it is protected and preserved. Wates Development considers that the evidence above suggests that Option 1 will have a greater impact than Option 2 and 3 with respect to the loss of BMV agricultural land. We consider it appropriate to amend the scoring with Option 1 scoring a '2' and Options 2 and 3 a '1' and '2' respectively.

Landscape

4.31 These representations are supported by representations and a Landscape Technical Note (TN) from SLR Consulting. This note provides evidence which demonstrates that:

- 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'.

- Development toward the west of Southbourne 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.'

- The SA states that 'a preliminary Landscape and Visual Impact Assessment undertaken by the site promoter [Wates Developments] has identified a potential moderate impact on the National Park and moderate / minor impact on the National Landscape'. The TN states that 'the scale of change in views from the SDNP is generally slight or negligible, and consequently the overall visual effects are likely to be moderate at most and often minor. In fact, the availability of open and unobstructed views are generally very restricted'. It is noted that no such assessment has seemingly been undertaken in respect of Options 1 and 3.

4.32 Wates Developments are of the opinion that, with the evidence presented in the TN, Option 2 should score a '1' with Option 1 being the least favourable at a '3'. Option 3 should score a '2'.

Transport and Accessibility

4.33 Wates Developments note that the SA currently scores Option 2 as the least favourable with a '3' followed by Option 3 and Option 1 as the most favourable. The justification for this score for Option 2 is:

- Option 2 is considered to perform least favourably as access off the end of South Lane could be constrained due to the character and nature of this historic lane, which would likely need to be widened to accommodate increased traffic. However, the option performs well by utilising the existing multi-modal crossing over the railway line via Inlands Road and providing both a multi-modal bridge and a pedestrian / cycle bridge. Nevertheless, the significant deliverability and viability concerns regarding the multi-modal bridge are recognised.

4.34 Representations by i-Transport confirm the following:

- Scenario 2 could provide an alternative access north of the railway line (via Inlands Road) and a larger amount of land south of the railway. This means that Scenario 2 is less reliant on the bridge than Scenario 1 (para 4.13).

- Vehicular access from South Lane (via a realignment of the lane into the site and minor improvements within highway land) has been agreed in principle with WSCC with proposals well advanced.

- Eight potential points of entry for pedestrians and cyclists have been identified within Option 2 which all use land within the allocation and/ or public highway.

- Option 2 is less reliant of a bridge than Option 1.

- Improvements to the cycling infrastructure on Cooks Lane can be delivered.

- Land is safeguarded in Option 2 for the footing of a footbridge.

4.35 With respect to Option 1 the i-Transport representations note that there is considerable uncertainty with respect to the deliverability of the bridge and footpath connection due to multiple landowners and the potential requirement for a 'land swap'. This uncertainty has the potential to severely undermine the access strategy for Scenario 1 because, without a bridge, there will be no alternative pedestrian route across the railway line to footpath 231, demands for which will increase significantly with 800 homes. i-Transport's experience is that Network Rail can object (and have done so before) to proposals that will increase demands on uncontrolled pedestrian level crossings. A grade separated pedestrian route across the railway line must be delivered. Further details are provided in i-Transport's representations, with a supporting example.

4.36 With this evidence, Wates Developments considers it unreasonable to identify Option 2 as the 'least favourable' option and Option 1 as the most favourable. We consider that there is sufficient evidence to recognise Option 2 as the most favourable and Option 1 as the least favourable with respect to Transport and Accessibility.

Water

4.37 Wates Developments support the scoring identified in the SA against this SA Objective. We do not believe that either Option 2 or 3 will result in a significant negative effect with respect to water supply or quality.

Summary

4.38 Table 3.1 of the SA summarises the scoring of the three development Options and which cumulatively result in the following scores:

- Option 1 = 21;

- Option 2 = 19; and

- Option 3 = 18.

4.39 Following the information presented in these representations, Wates Developments believe that the cumulative scores should be amended as follows:

- Option 1 = 25;

- Option 2 = 14; and

- Option 3 = 17.

4.40 The revised scoring confirms that Option 2 is the most favourable development Option followed by Option 3 with Option 1 being the least favourable.

5. Viability Assessment

5.1 The Viability Assessment advises that the Council have provided estimated Section 106 contributions for each capacity option, based on the draft DPD Infrastructure Summary document. It is unclear whether these have also factored in costs in relation to the Community Infrastructure Levy.

5.2 We note the Council's Local Development Scheme (LDS, July 2024) does not include a programme for the review of the Council's currently Community Infrastructure Levy Charging Schedule. It does however advise that:

"Both the CIL Charging Schedule and the Planning Obligations and Affordable Housing SPD will require review and possible amendment in the light of the development proposed in the Local Plan, the contents of the Infrastructure Delivery Plan and the Whole Plan Viability Assessment (evidence base documents to support the Local Plan). At the current time the precise timescales for these reviews are uncertain. The LDS will be updated when they have been determined."

5.3 We support the recognition of the need for a review. To ensure early delivery of the Southbourne allocation following adoption of the SADPD is achievable, we consider this should be undertaken at an early stage. This should include consideration as to whether strategic sites, such as Southbourne, should be zero CIL rated to reflect the considerable onsite infrastructure they are required to deliver.

5.4 Furthermore, we understand that the costs identified in the Infrastructure Delivery Plan supporting the Local Plan, have been pro-rated to reach the figures identified for Southbourne. As per our earlier comments, it is considered that a Southbourne specific Infrastructure Delivery Plan should be prepared to ensure the costs identified are accurate.

5.5 It will be important that such considerations are factored into the next iteration of the Viability Assessment.

5.6 We note the Viability Assessment has been assessed on the basis of an 800 dwelling net requirement and a 1,050 dwelling gross requirement. Given our wider comments, depending on the outcome of the Local Plan Examination, it may be necessary for additional higher quantums of development to be tested. It is noted that the 1,050 dwelling scenarios tested to date present stronger viability prospects than 800 dwellings.

5.7 We support the conclusion of the Viability Assessment that more refined details and costings will be required in relation to the railway crossings and the wider infrastructure works/s106 requirements/contributions. Whilst not a consideration for the Viability Assessment itself, it will also be necessary for the SADPD to establish how infrastructure is to be funded and secured.

6. Summary and Conclusion

6.1 These representations have been prepared by Turley in respect of the current consultation on the emerging Southbourne Allocation DPD (SADPD) Regulation 18 consultation.

6.2 Wates Developments have land interests in the District, including those to the east of Southbourne within the Broad Location for Development (BLD) that Chichester District Council (CDC) propose to deliver under draft Local Plan Policy A13 and which is the subject of the emerging SADPD. The emerging Local Plan has been the subject of recent Examination hearings, the outcome of which are awaited. It is anticipated that a round of consultation on proposed modifications will be required ahead of receipt of the Inspector's Report. It will be important therefore that the emerging SADPD has due regard to any changes made to the Local Plan through this process, to ensure the two are in conformity. This includes the potential for a commitment to an early review to ensure additional growth can be planned for at an early stage. It is important that the SADPD does not prejudice the opportunity to explore additional growth at Southbourne, should this be required as an outcome of the current Local Plan Examination. Our comments on the SADPD are provided without prejudice to the submissions we have made through the Local Plan Examination process.

6.3 Our clients support Scenario 2: Land to the East of Southbourne subject to the comments provided below. The Vision Document at **Appendix Four** demonstrates how this could be delivered. Our clients also consider Scenario 3 to also potentially be a suitable scenario, subject to further consideration on the delivery of infrastructure and how this could be equalised across the parties.

6.4 Detailed comments have been provided on the consultation document as well as the supporting Assessment Framework and accompanying interim Sustainability Assessment. These provide further information and clarification to assist in the Council's consideration of the Scenarios which further demonstrate the appropriateness of Scenario 2.

6.5 To assist in the preparation of an update to the Viability Assessment, to address our comments on the current iteration, it is considered a Southbourne specific Infrastructure Delivery Plan should be prepared ahead of further consultation on the SADPD.

6.6 We look forward to continuing to engage with the Council and their consultant team in the development of the SADPD and would be keen to arrange a further meeting to discuss our representations following the close of the consultation.

Appendix 1: Southbourne Neighbourhood Plan Review Examiner's Report March 2022

SOUTHBOURNE PARISH NEIGHBOURHOOD PLAN REVIEW 2019-2037

Submission Draft

REPORT TO CHICHESTER DISTRICT COUNCIL

By

Christopher Lockhart-Mummery QC

Independent Examiner

March 2022

SUMMARY

I was appointed in September 2021 to carry out the independent examination of the Southbourne Parish Neighbourhood Plan Review 2019-2037 (NP2).

I have been supplied with, and have read, all the background documents, including the 103 representations made at Regulation 16 stage.

The most substantial, and controversial, aspect of NP2 is the proposed allocation, under proposed Policy SB2, Land East of Southbourne Village, of a residential mixed use scheme to provide at least 1,250 homes.

The local plan comprises the Chichester Local Plan: Key Policies 2014-2029, adopted in July 2015 (the LP). This made an allocation to Southbourne of 300 homes in the form of medium-scale extensions.

In December 2018 Chichester District Council published, for consultation under regulation 18 of the Local Plan Regulations, a Preferred Approach Local Plan Review (LPR). This proposes an allocation of a minimum of 1,250 homes at Southbourne. Consultation on a submission LPR is planned for summer 2022, with a possible examination in spring 2023.

I determined at an early stage that a hearing was necessary. This was held (virtually) on 14 January 2022.

I find that the key Basic Condition in the present case is whether *the making of the plan is in general conformity with the strategic policies contained in the development plan for the area of the authority.* I conclude that NP2, taken as a whole, is not in general conformity with those strategic policies. It proposes a major strategic allocation, quite inconsistent with the LP and not in general conformity with it. I therefore conclude that NP2 does not comply with the Basic Conditions, and that it must be refused.

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Introduction

1. I was appointed on 29 September 2021 by Chichester District Council (CDC) with the support of the qualifying body the Southbourne Parish Council (the PC), to undertake the independent examination of the submission draft Southbourne Parish Neighbourhood Plan Review 2019-2037 ("NP2"). I am a Queen's Counsel with over 40 years experience in planning law and practice. I am a member of the NPIERS Panel of Independent Examiners. I am independent of any local connections and have no conflict of interest.

2. I was supplied with links to all relevant background planning documents, including the adopted Local Plan (the LP), the emerging Local Plan Review (the LPR) and NP2. I was also supplied with hard copies of the 103 representations made at regulation 16 stage.

The LP background, and submission of NP2

3. The existing Neighbourhood Plan for Southbourne Parish is the Southbourne Parish Neighbourhood Plan 2014-2029 (NP1). The Neighbourhood Plan area was designated by CDC on 5 March 2014. It comprises six settlement areas: Hermitage, Lumley, Nutbourne West, Prinsted, Southbourne and Thornham. NP1 was made by CDC on 15 December 2015. It was approved by referendum on 5 November 2015, with 87% of voters agreeing. Policy 2 allocated 4 sites for a total of 350 dwellings.

4. Shortly before NP1 was made, CDC adopted the Chichester Local Plan: Key Policies 2014-2029 (the LP) in July 2015. This remains the adopted LP for the area. It describes Southbourne (2.6) as having a population of around 6,000, links to the nearby towns of Havant and Emsworth, a number of employment opportunities, a railway station and a secondary school. One of its strategies is "the East-West Corridor" from Hermitage in the west to Tangmere in the east. Both locations are "settlement hubs" which, along with others, are to be the focus of sustainable growth. Policy 2 provides that new developments in settlement hubs will "meet identified local needs". Strategic development

locations are identified at, amongst others, Southbourne "in the form of medium-scale extensions". Pursuant to those strategies, paragraphs 12.63-12.67 and Policy 20 describe the form of development proposals at Southbourne, with "a level of development that is appropriate to its size, character and environmental constraints": 12.65. The level of development proposed is 300 homes, "planned as an extension(s) to Southbourne, that is well integrated with the village and provides good access to existing facilities": Policy 2.

5. In December 2018 CDC published, for consultation under regulation 18 of the Local Plan Regulations, the draft Chichester Local Plan Review 2035 Preferred Approach (the LPR). Policy S4 provided a housing target of 12,350 dwellings for the period 2016-2035. Under Policy S5 the Parish Housing Requirement for Southbourne was specified as nil. Policy AL13 proposed to allocate a minimum of 1,250 dwellings in the revised Southbourne Neighbourhood Plan. The direction of expansion(s) was not indicated. The LPR recommended that a number of junction improvements on the A27 Chichester Bypass would be required.

6. On 29 July 2021 a report was considered by CDC addressing the relationship between the LPR and the A27 improvements. The recommendations, which were accepted, were stark. The full scheme of improvements was "undeliverable"; the LPR was likely to be unable to meet full housing needs. CDC have commented that "...no further update can be provided...regarding the final distribution [which must include amount] of development to be proposed in the emerging Chichester Local Plan area".

7. Following an informal member/officer meeting on 12 January 2022, CDC supplied a letter to the examination dated 13 January 2022. It stated that the emerging development strategy is "continuing to test" 1,250 homes at Southbourne, and that this should be the "working assumption" for NP2. So far as the LPR is concerned, the present timetable is a proposed submission plan consultation in summer 2022 with examination in spring 2023 and adoption in summer 2023. Bearing in mind the scope and complexity of the LPR this last date (in particular) seems to me to be extremely optimistic.

8. I take the opportunity at this stage to refer to the consultation response of CDC in November 2019 to the SA/SEA accompanying NP2. The relevant officer stated:

> *"It is accepted that the SEA process is iterative. However, it is important to note that the revised Southbourne Neighbourhood Plan (NP) will be examined against policies in the Chichester Local Plan Review rather than the existing adopted Local Plan. The allocation of sites in the revised NP will need to be in conformity with the Local Plan Review as will other NP policies.*
>
> *As currently written the emphasis in the scoping report appears to be on policies in the adopted Local Plan. CDC asks that this is revised to take account of policies in the Preferred Approach Local Plan Review, albeit it is agreed these are still emerging and subject to change. In order to ensure the draft neighbourhood plan accords with the policies and housing requirements of the Local Plan Review, the submission version of the draft NP should not be submitted to CDC until after the adoption of the Local Plan Review when the policies will be in their final format and at that stage will form part of the development plan."*

Thus CDC was advising the PC not to submit NP2 in advance of the adoption of the LPR, and assuming that this examination would take place in the context of an adopted LPR. This advice and assumption seem to me to be not only prescient, but correct. I explain my reasons for this comment below.

The submission plan (NP2)

9. In its submitted form, NP2 is a hybrid. It was proposed as "largely a replacement of the made Plan", with 3 policies of the made NP1 retained, with minor updating, for the original plan period to 2029. Appendix A contained what was called a "Modification Proposal Statement" setting out proposed amendments to Policies 2, 3 and 8.

10. In my Note 1 dated 5 October 2021 I set out my reasons for concluding that the above approach would not be lawful. CDC and the PC responded on 8 October, disagreeing with Note 1. In my Note 2 dated 12 October I retained my position, but suggested a solution of incorporating the previously "retained" policies as

policies within NP2, all policies having the same plan period of 2019-2037. This way forward was agreed, and proposed amendments were put forward, essentially incorporating Policies 2, 3 and 8 as Policies SB23-25 in NP2. Consultation on a document (SBPC001) setting out these amendments was undertaken by CDC for a three week period to 6 December 2021. Eight representations were received.

The evolution of NP2 and consultation

11. The LP was adopted in July 2015, and CDC commenced a review process in June 2017. As the Consultation Statement states (1.11) "*Southbourne Parish Council became aware that its NP would require review to bring it in line with the strategic requirements of the emerging Local Plan review*".

12. Work on the review of NP1 (i.e. NP2) commenced in March 2018 with the help of the Neighbourhood Plan Steering Group (NPSG). The process of evolution of NP2 and the consultation were set out fully in the Consultation Statement. It sets out the three stages of consultation from December 2018 to January 2021. During Stage 2, residents were encouraged to consider three possible site options to accommodate the 1,250 homes referred to in the LPR, to the east, to the west, or using a combination of small sites. The last of these was not supported. In Stage 3, December 2019, the remaining two options (to the west or to the east) were displayed. Of the 226 completed questionnaires (actually 236), 51% preferred the east, 34% preferred the west, and 15% had no preference. It is stated (3.11) that this was "*a key consideration when the SPC made the decision to allocate land to the east in the Pre-Submission Plan*".

13. Regulation 14 consultation was undertaken between 17 August – 12 October 2020. This was extensively advertised, though due to Covid it was not possible to hold any public consultation exhibitions or events. 145 responses were received (including 122 from residents). Changes were made to the Plan set out in paragraph 5.26.

Assessment of consultation process

14. It is apparent from the regulation 16 responses that some residents are critical of certain aspects of the consultation process. In my view, such consultation processes can seldom be perfect. I find that, overall, the PC went to extensive lengths to try and engage the local community, and that the consultation process was adequate.

15. The stark fact, however, and this is not the fault of the PC, is that the level of response was very low. This is by no means unusual in neighbourhood planning. But the present circumstances are most unusual, i.e. involving a major decision as to the future size of the village ("the transition of a large village to a small town": NP2, 5.23), and a binary decision as to east versus west. Assuming the 236 questionnaires were all by residents, less than 2% decided in favour of the chosen option.

Regulation 16 consultation

16. Consultation on the Submission NP was carried out over the period 8 April – 3 June 2021. Representations were made by 103 individuals and bodies (many of whom made multiple representations). I have carefully considered all these representations.

Decision to hold a hearing

17. The SB2 allocation (Land East of Southbourne Village) was by far and away the most controversial topic. In the light of the fact that, if developed, it would increase the number of households in the village by over 50%, and it is described in paragraph 5.23 of NP2 as a "step change for the village not dissimilar to the transition of a large village to a small town", this is not at all surprising.

18. From an early stage, I came to the view that a hearing would be required. In the language of the statute, this would be required to enable me to undertake

adequate examination of the issues raised by SB2, and also to ensure that those promoting SB2, and those objecting to it, might have a fair chance to put their cases. I announced my decision to hold a hearing on 12 November 2021. Apart from CDC and the PC, I invited a representative(s) for the promoters of SB2, representatives of those local residents who had submitted representations objecting to SB2, and the Church Commissioners for England (who control a large site broadly representing the western option).

19. The hearing was held on 14 January 2022. Owing to Covid circumstances, it was decided to hold it virtually, and CDC managed the process expertly. I believe that all those who wished to felt able to make their views known, and no-one suggested to the contrary. I found the hearing to be a vital part of the examination as a whole.

20. I visited the area, unaccompanied, on 18 October 2021.

Principal statutory requirements

21. The principal relevant sources are sections 38A-38C of the Planning and Compulsory Purchase Act 2004, and Schedule 4B to the Town and Country Planning Act 1990 (as amended).

22. A neighbourhood plan must set out policies "*in relation to the development and use of land*" in the neighbourhood area. NP2 meets this requirement. It must specify the period for which it is to have effect. The plan period for NP2 is specified as 2019-2037. It must not include provision in relation to "*excluded development*": this is complied with. It must not relate to more than one neighbourhood area: this is complied with.

23. Under Schedule 4B the principal task for the examiner is to consider whether the plan meets the "Basic Conditions". A neighbourhood plan meets the basic conditions if:

(a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the plan,

(d) the making of the plan contributes to the achievement of sustainable development,

(e) the making of the plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),

(f) the making of the plan does not breach, and is otherwise compatible with, retained EU obligations.

24. The national policies and advice containing guidance are principally the NPPF and PPG on neighbourhood plans. The policy/advice most relevant to NP2 is:

(i) the advice in PPG as to bringing forward a neighbourhood plan before an up-to-date local plan is in place. The reasoning and evidence in the emerging local plan is likely to be relevant for the consideration of the basic condition. This position has been considered in a number of cases in the courts, not least DLA Delivery v. Lewes DC (2017) EWCA Civ 58;

(ii) the stated purpose of neighbourhood plans to give communities the ability to choose where they want new homes (41-001-20190509);

(iii) the advice, in the context of the viability of plans, that more detailed advice may be necessary for key sites on which the delivery of the plan relies.

Assessment of policy SB2: land east of Southbourne Village

25. As already noted, this proposed development would increase the number of households in the village by over 50%, and it would "result in a step change for the village not dissimilar to the transition of a large village to a small town": 5.23. It would involve the substantial expansion of the village beyond its present limits. Not surprisingly, the implications of SB2 permeate much of the entire

plan, as indicated (by way of example only) in the Foreword, in the Policies Map, SB4, SB5, SB6, SB13 and accompanying maps.

26. I turn first to Basic Condition (e).

27. It is apparent from the Foreword onwards, that SB2 is seen, quite obviously, as the key element of NP2. Further, and again quite obviously, it is proposed Policy AL13 of the LPR that has driven, and underpins, SB2 as paragraph 5.19 states:

> *This policy serves to fit between eLP Policy AL13 of the Preferred Approach Local Plan and the comprehensive master planning of the land as required by Policy 7 of the CLPKT and Policy S32 of the eLP. Policy AL13 proposes the role of this Plan Review is to allocate land for a minimum of 1250 dwellings along with education, community, employment and green infrastructure and open space uses.*

28. It was contended at the hearing by the PC, CDC and the SB2 promoters that, while the allocation of 1,250 homes was a quantum leap over the LP allocation, the strategy underlying the allocation was consistent with the LP strategy (described at paragraph 4 above). I do not accept that contention. The modest level and nature of the allocation in Policy 20 reflected and gave effect to the east-west corridor and settlement hub strategy set out earlier in the LP.

29. I find that SB2, in its allocation of 1,250 homes by way of a very significant expansion of the village, incorporates a quite different strategy. The response and advice of CDC in November 2019 were correct. The development plans officer of CDC accepted at the hearing that the two levels of development were of a "*different nature*" and that the SB2 allocation was "*outside the parameters of the LP*". I therefore conclude that SB2, the key policy of NP2, is quite inconsistent with the LP.

30. The statutory test in Basic Condition (e) is whether the neighbourhood plan, taken as a whole, is in general conformity with the strategic policies of the local plan. It was common ground that SB2 is central to NP2. That is clear from NP2 as a whole, not least its Foreword. I asked at the hearing whether, in the event

that SB2 fell, anyone would contend that NP2 should proceed without it. No-one so contended. The PC representative was quite clear: "*Without SB2 we don't have a neighbourhood plan*". I agree. I therefore conclude that NP2 does not comply with Basic Condition (e).

31. In so concluding I bear in mind all the following. The case law referred to in paragraph 24 above (the fact that the plan period of the neighbourhood plan in that case, 2015-2030, did not coincide with or even overlap the plan period of the local plan, 1991-2011, was important. Here, the NP period 2019-2037 substantially overlaps with that of the LP, 2014-2029); the fact that, without a made neighbourhood plan, CDC will continue to come under significant pressure from a number of planning applications proposing, cumulatively, significant development; comparable cases (I note that at Blandford Forum the examiner, faced with an emerging local plan, found that the significant neighbourhood plan allocation was "*fully in accord with the local plan*": report paragraph 9.3. This could not possibly be said in relation to NP2.).

32. I note that, in its regulation 16 Response, CDC noted that "*as yet the overall development strategy for the...LPR has not been agreed*". It went on to advise that "*there may be a need for the Parish Council to undertake an early review of the NP once final numbers for the submission version of the LPR are agreed or if the figures are amended through the subsequent examination of the LPR. As a result this will potentially require the PC to undertake further work including with the wider local community prior to redrafting the NP, along with the Strategic Environment Assessment (SEA) and Habitats Regulations Assessment (HRA) work to date, and to review other relevant evidence that supports the proposals in the draft plan*".

33. As I said at the hearing, I do not understand or accept this approach. If NP2 proceeded, it might be made towards the middle of this year. Any planning applications for development within the SB2 allocation would then fall, in principle, to be granted. This would be at a stage when the strategy for Southbourne in the LPR will remain not agreed.

Conclusion

34. I have concluded above that NP2 does not comply with Basic Condition (e). Pursuant to paragraph 10(3)(a) of Schedule 4B to the Town and Country Planning Act 1990, I do not consider that I could recommend any modifications which secure that NP2 would meet Basic Condition (e). Pursuant to paragraph 10(2) I therefore **Recommend that the proposal for NP2 is refused and therefore cannot recommend that it proceeds to referendum**.

35. It is therefore neither necessary nor appropriate for this report to address the other Basic Conditions, or to address the other elements of NP2 apart from SB2 and its implications.

36. I have reached this conclusion and recommendation with great reluctance. I am acutely aware of the very substantial time and effort that all those involved in NP2 have put in to the Plan. It would seem unfortunate that the advice of CDC in November 2019 was, for reasons unclear to me, not acted on. However, the statutory framework is clear, and the non-compliance with Basic Condition (e) is also clear.

Christopher Lockhart-Mummery QC

Examiner

10 March 2022

Appendix 2: i-Transport Technical Note

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Land at Southbourne: DPD Consultation Response Note

Ref: MS/SG/ITB14672-022C TN
Date: 6 December 2024

SECTION 1 Introduction

1.1 This note responds to the questions in the Southbourne Allocation Development Plan Document (SADPD) (Regulation 18 Consultation Document).

1.2 Land at Southbourne is identified as a broad location for development (BLD) for 1,050 homes.[1] The exact area of development is yet to be confirmed and the purpose of the DPD, through local consultation, is to identify this. The Examination of the draft Local Plan remains ongoing and the SADPD will need to reflect any changes required to the Local Plan through this process.

1.3 Three Scenarios are being consulted on:

- Scenario 1: Land west of Southbourne (predominantly controlled by Church Commissioners).
- Scenario 2: Land east of Southbourne (predominantly controlled by Wates Developments).
- Scenario 3: Land west and east of Southbourne – a combination of both.

1.4 In all scenarios, most land is north of the railway line. Scenarios 1 and 2 are suggested to require a vehicular road bridge across the railway line to the A259, while Scenario 3 is suggested to require only pedestrian / cycle bridges.

Overview of findings

1.5 Whilst the DPD does not specify a preference as to which scenario should come forward, the 'benefits' and 'challenges' cited under each scenario (and the appended Assessment Framework and accompanying Interim Sustainability Appraisal) fail to identify:

- The advantage that Scenario 2 has in terms of proximity to services.

[1] This is reduced to around 800 in the DPD, as an adjustment for recent planning permissions.

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- The significant risks to the delivery of the access points into Scenario 1 land and the consequences of failing to deliver them.
- The consequences for traffic conditions and housing delivery if the road bridge did not come forward, which are more significant for Scenario 1.

1.6 The DPD therefore needs to be amended to recognise the following:

The accessibility of each site to services

1.7 Scenario 2 is closer to many of the facilities in Southbourne. It has multiple potential points of access via rights of way and highway frontages, which will help minimise already walkable distances to the services.

The accessibility to services if unsecured land cannot be used

1.8 The road bridge for Scenario 1 is largely described as if it has been secured. Closer reading reveals that further agreement with landowners, and indeed with Network Rail, is needed to secure a bridge over the railway line into Scenario 1.

1.9 The absence of a road bridge will intensify walking demand on the at grade level crossing on footpath 241, which links Scenario 1 to the A259. In i-Transport's experience, without a bridge, Network Rail will likely object to a proposal that will cause any intensification of demands on a footpath and an application to extinguish the footpath is unlikely to succeed without a plausible, safer alternative. Taking this approach would be consistent with how Network Rail has dealt with other planning application sites in West Sussex that are near footpaths. Scenario 2 has no constraining footpaths.

1.10 Furthermore, the only two pedestrian accesses into Scenario 1 both rely on third party land. Without these accesses in place, Scenario 1 will effectively be a cul-de-sac in the north of the village, with walking distances to local amenities (already greater than Scenario 2) significantly extended.

The consequences of not providing a bridge for local traffic and housing numbers

1.11 With uncertainty over the deliverability of any road bridge (east or west), the number of homes that can come forward without a road bridge being built will need to be clarified as part of a planning application evidence base – irrespective of which scenario comes forward.

1.12 In this event, Scenario 2 would be preferable (in terms of highway operation and housing delivery) because:

- It has a larger area south of the level crossing and is therefore able to provide a greater number of homes without adding material traffic to the level crossing (as most traffic will travel south to the A259).

- It can potentially deliver homes onto the more lightly trafficked Inlands Road, taking traffic away from Stein Road. This would entail further benefits:
  - (a) The opportunity to fund a double barrier crossing there (further details on the acceptability of this as an improvement to the crossing are provided in this note).
  - (b) The potential to introduce a loop road for new bus services.

1.13 Scenario 2 can deliver more homes without a bridge becoming necessary.

Structure of Note

1.14 This note responds to the questions raised in the draft DPD. The remaining sections of this report respond to each of the sections in the DPD, with sub-headings named after the questions in each section. A summary is provided at the end of the report.

SECTION 2 Visions and Objectives

2.1 Q1. Do you agree with the vision and objectives set out? If not, please set out how you think they should be amended?

2.1.1 In broad terms, i-Transport agrees with the vision and objectives but has the following recommendations related to the wording of the 'Transport and Sustainable Travel' objective:

- The objective is too focussed on connections to the railway station. Reference should also be made to bus stops and other key amenities.
- Reference should be made to providing direct walking and cycling routes to multiple points of access into the site, so as to minimise walking distances and thus increase the likelihood of making trips by walking or cycling.

2.1.2 Doing so would accord with the first two bullets of paragraph 114 of the NPPF (2023):

- ***"Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location.***
- ***Safe and suitable access to the site can be achieved for all users."***

2.1.3 Scenario 2 is exceptionally well positioned to achieve these objectives:

- It is able to provide multiple points of pedestrian and / or cycle accesses from both existing highways, footpaths and the land that adjoins it. The smaller number of connections to Scenario 1 require third party land.

Image 2.1: Existing points of access to Scenario 1

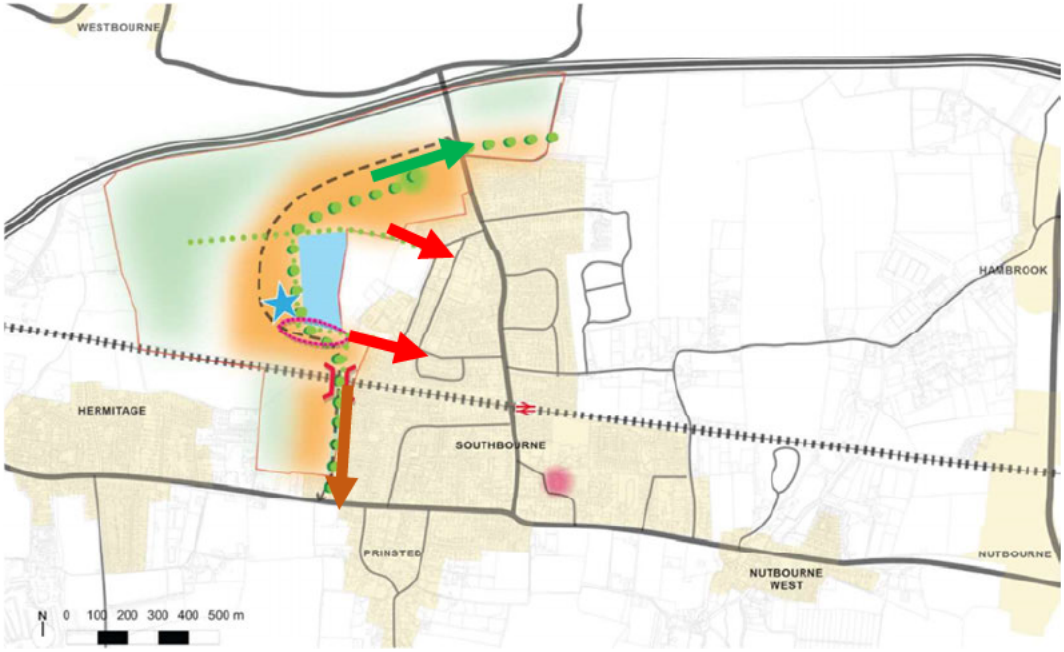


Image 2.2: Existing points of access to Scenario 2



Green – deliverable on highway land or land within broad area of development red line land abutting highway.

Brown – further work needed to secure route

Red – requires land outside BLD red line

- It is therefore more closely positioned to most local amenities (further details to follow in this note).
- Scenario 2 is capable of delivering a pedestrian railway bridge between Cooks Lane and Priors Orchard, facilitating routes south to the A259, bus stop and village centre at the mini-roundabout, which will enhance connections between the north and south of the village.

SECTION 3 Site Scenario Options – Scenario 1: Land to the West

3.1 Q2. Do you agree with the list of benefits or challenges set out above?

The benefits text fails to acknowledge risks to delivering the bridge

3.1.1 The benefits section overestimates the degree of certainty of achieving the bridge, with paragraph 5.13 noting that land is safeguarded for a road bridge through Section 106 agreements from development south of the railway.

3.1.2 Whilst this is correct, wording elsewhere in the DPD shows that it is not a 'done deal':

- Paragraph 5.15 notes multiple landowners south of the railway bridge and further negotiation being expected.
- Appendix A (*ref: page 39, third row)* notes that a 'land swap' may be required to facilitate bridge footing.
- Paragraph 5.19 outlines some potential consequence of the bridge not being delivered (further details below).

3.1.3 Similarly, this significant issue is barely mentioned in the constraints section. Paragraph 5.18 acknowledges only that additional vehicular access will require third party land. It needs to mention that the same is true of the bridge connection.

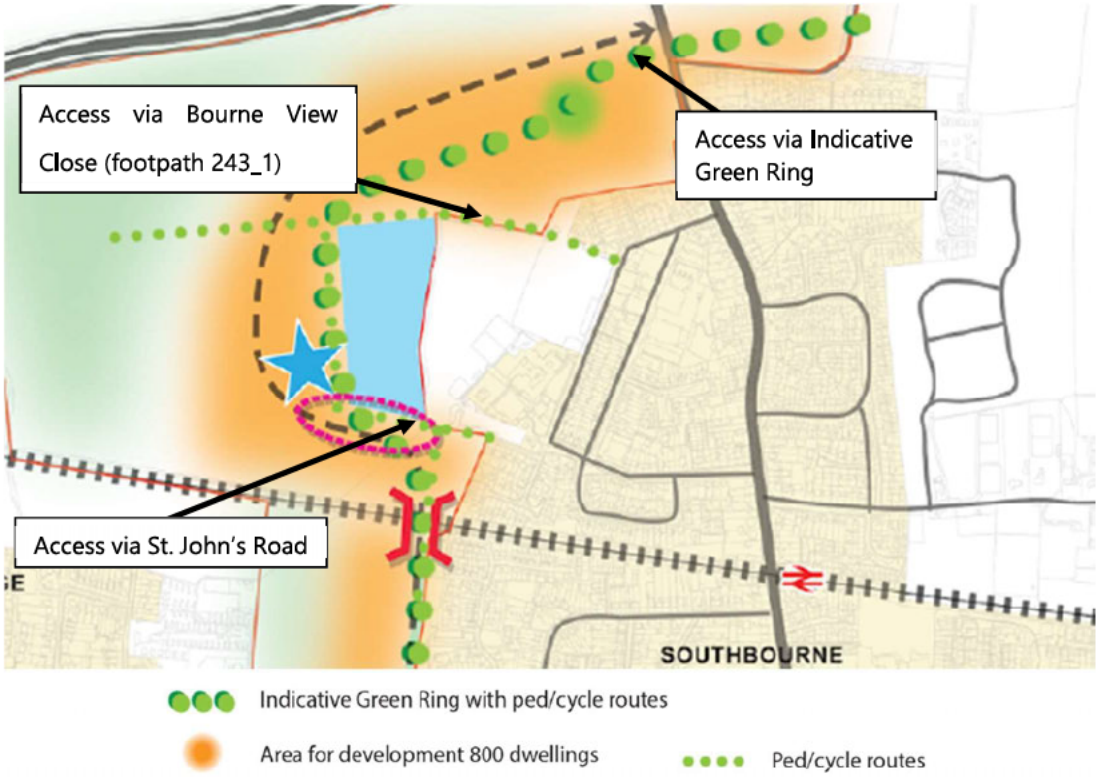
3.1.4 Paragraph 5.15 therefore needs to be clearer about the uncertainty facing the bridge.

The benefits section fails to make clear that land has not been secured to deliver or improve the pedestrian accesses

3.1.5 Paragraph 5.12 states that there would be "*multiple opportunities to create walking and cycling connections into the existing village*" in Scenario 1.

3.1.6 'Multiple' is an overstatement. There are in fact three potential pedestrian routes into the site, other than the vehicular access points. One is the 'Green Ring' in the far north, which can be delivered to Stein Road; one is footpath 243_1 to Bourne View Close and one is a pedestrian link to St John's Road. The latter two (which provide the most direct routes into the village) are in doubt.

Image 3.1: Pedestrian access routes in north



3.1.7 Access onto St John's Road requires land outside of Scenario 1. St John's Road is not adopted as highway. The DPD acknowledges that this will require third party land.[2] It will also need to be upgraded to provide a more year round route to Park Road. The ability to deliver a connection there is not certain.

Image 3.2: Land Registry title plans



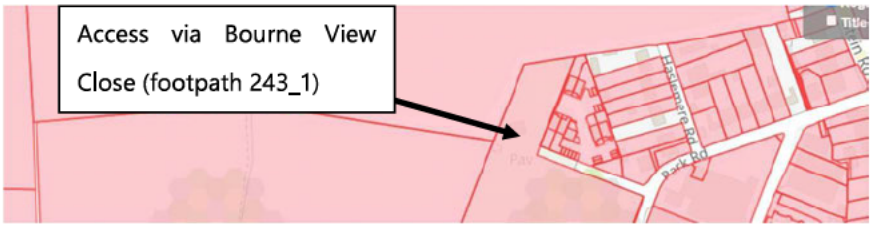
[2] Paragraph 5.18 acknowledges that a vehicular route there will need third party land – a pedestrian route will too – see Land Registry Map extract. St John's Road is not adopted as highway.

Image 3.3: Existing St John's Road cul-de-sac



3.1.8 The next available route to the north is footpath 243_1. This can be delivered because a footpath is a public right of way[3]. However, the route still will need improvement as there is no path through the grass in the recreation ground. It is therefore not a suitable pedestrian access for a large residential site at present. The grass section is also on third party land, outside of Scenario 1.

Image 3.4: Land Registry title plans and Aerial Image





3.1.9 Paragraph 5.12 needs to be clear that there are in fact three additional points of access, two of which will require third party land for delivery and / or improvement.

[3] Although it will need to go through a legal process to upgrade it to a bridleway and allow cycling.

3.2 Q3. Are there other benefits or challenges that you think should also be included?

3.2.1 Yes. The difficulty of securing third party land for a bridge and footpath connection needs to be acknowledged, as do the risks of failing to deliver the two pedestrian access points, which are considered below.

Without the St John's Road link, pedestrians would face significantly longer walking distances

3.2.2 If land is not secured for this key link, then access would be limited to the seasonal footpath 243_1 to Bourne View Close – or the Green Ring in the far north.

3.2.3 Even using footpath 243_1 would lead to lengthy diversions for pedestrian and cycle access to many local facilities located to the south and east.

3.2.4 Table 3.1 provides a comparison of distances to local facilities in Southbourne, looking at Scenario 1 (with access via either St John's Road or footpath 243_1) and then Scenario 2 in turn.

3.2.5 In terms of what constitutes a walkable / cyclable distance:

- Up to 800m is identified by MfS as a 'comfortable' walk for most (*ref: paragraph 4.4.1*).
- 1.6km is a 'reasonable' walking distance with circa 82% of all trips up to one mile undertaken by this mode (*ref: NTS0308)*.
- 3.2km is an 'acceptable' walking distance with circa 30% of journeys likely to be made on foot (*ref: NTS 0308*).
- 8km is an acceptable cycling distance for most (non-leisure) cycling journeys.

Table 3.1: Walking and Cycling Journey Times to key local facilities

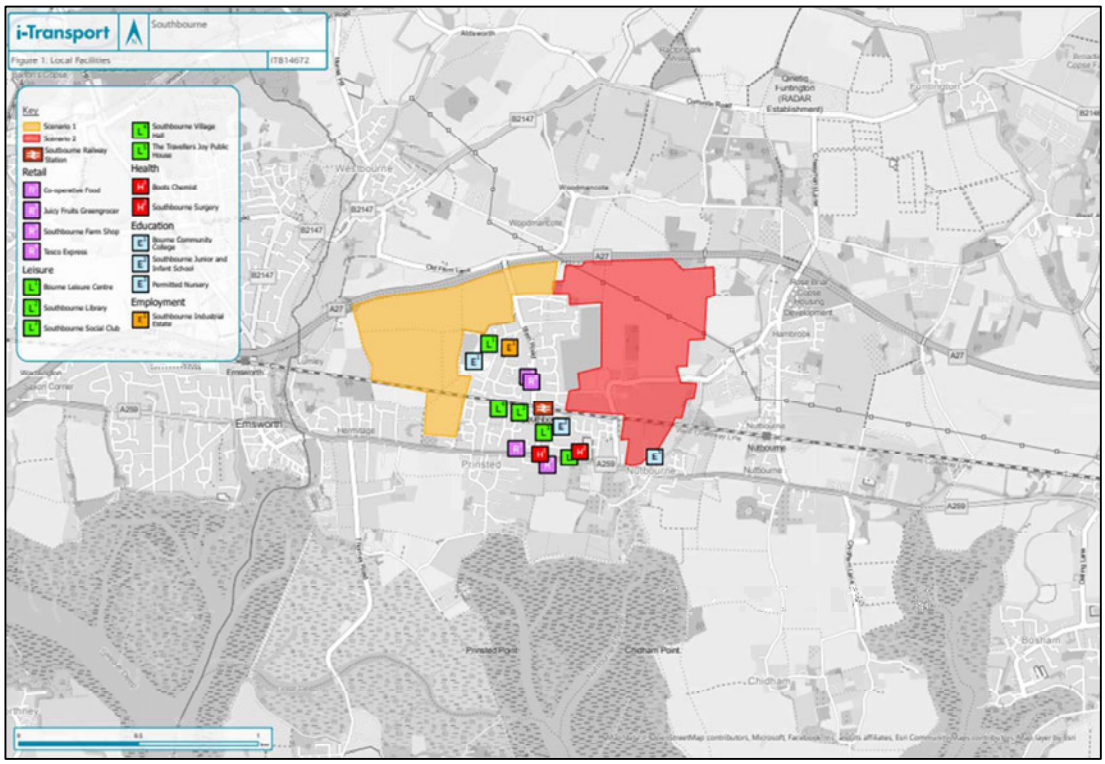
	Scenario 1 (access via footpath 242_1)	Scenario 1 (access via St John's Road)	Scenario 2
Leisure			
Southbourne Village Hall	1,700	1,270	1,100
Bourne Leisure Centre	900	610	1,200
Southbourne Library	1,700	1,220	1,000
Southbourne Social Club	1,700	1,270	1,200
The Travellers Joy Public House	2,000	1,570	1,430
Retail			
Tesco Express	1,250	920	800
Juicy Fruits Greengrocer	1,250	970	850
Southbourne Farm Shop	1,900	1,450	1,200
Co-operative Food	2,000	1570	1,300
Education			
Bourne Community College	1,100	580	1,200
Southbourne Junior and Infant School	1,800	1,370	1,200
Permitted Nursery at Metis Site	2,700	2,170	1,100
Health			
Southbourne Surgery	2,100	1,670	1,200
Boots Chemist	1,900	1,400	1,200
Transport			
Southbourne Railway Station	1,650	1,170	850
Employment			
Southbourne Industrial Estate	850	950	1,300

Key:

Within a comfortable walking distance (800m)
Within a reasonable walking distance (1.6km)
Within an acceptable walking distance (3.2km)

Measurements from central points in each site

Image 3.5: Local Facilities Plan



3.2.6 Table 3.1 shows:

- All facilities are within a cyclable distance, irrespective of scenario.
- Scenario 2 is closer to most facilities, with all facilities within the 1.6 km 'reasonable' walking distance.[4]
- If Scenario 1 cannot deliver the St John's Road link, then the walking distance will be significantly extended, with many facilities more than 1.6km away, using footpath 243_1. Significant diversions from the most direct / 'crow fly' distance will entail (typically 300 to 500m).
- If surface upgrades in the recreation ground are not delivered and residents wish to use a year round surface (e.g. the Green Ring), then walking distances will be even greater than shown because the Green Ring is further to the north.

[4] Obviously, this depends on where residents live. However, measuring from the centre of the expected built-up areas in the west and east of the village, there is a clear pattern of many facilities being closer to the east.

Without the bridge, congestion on Stein Road will increase and demands for the at grade pedestrian crossing on the railway will intensify

3.2.7 Further details on these points are provided in the response to question 4, which focuses on the consequences of not providing a bridge.

Summary

3.2.8 The challenges section needs to be updated to note that:

- There is no guarantee that the bridge can come forward (further details of associated risks to follow).
- The pedestrian routes to the east from Scenario 1 are also subject to deals with third party landowners.
- Without those routes, Scenario 1 faces becoming a large cul-de-sac in the west of the village, with significantly increased walking distances into the village.

3.3 Q4. In this scenario, what do you think would be the challenges or issues if there wasn't a vehicular bridge over the railway line?

Worsening of queues on Stein Road and potential reduction in development quantum

3.3.1 With most development traffic expected to travel towards the A259, for journeys to Havant or Chichester, rather than northwards, the vast majority of trips will route over the level crossing on Stein Road, adding to queuing and delay there.

3.3.2 The STANTEC report to Chichester City Council of November 2020, entitled 'Level Crossing Baseline Safety Review,' concludes the level crossing can accommodate 750 homes before a bridge becomes beneficial.[5]

3.3.3 The conclusions are not definitive though. Some time has passed since then and any planning application will need to be supported by a robust, up to date transport evidence base that shows how the highway network will accommodate expected development traffic flows.

3.3.4 It is not therefore known at this stage how many homes can come forward without a bridge. However, Scenario 1 will allow a smaller number of homes to come forward without a bridge than Scenario 2. This is because Scenario 1:

[5] Even then, it was not found to be necessary.

- Has less land, south of the railway line and can therefore provide fewer homes there[6].
- Does not have any alternative point of access north of the railway to Stein Road, which is where the more heavily trafficked crossing is located[7]. It is therefore more sensitive to additional development.

3.3.5 It is well known that there is a strong desire locally to implement a bridge to relieve congestion at the level crossing. However, that bridge will not be delivered before a significant number of homes have been built (whichever site comes forward) because such infrastructure is normally funded by the sale of homes.

3.3.6 It will be for the SADPD to ensure the appropriate mechanisms are put in place to enable the delivery of infrastructure at the appropriate time alongside development. As per earlier planning submissions, a Southbourne specific Infrastructure Delivery Plan should be prepared to help inform this.

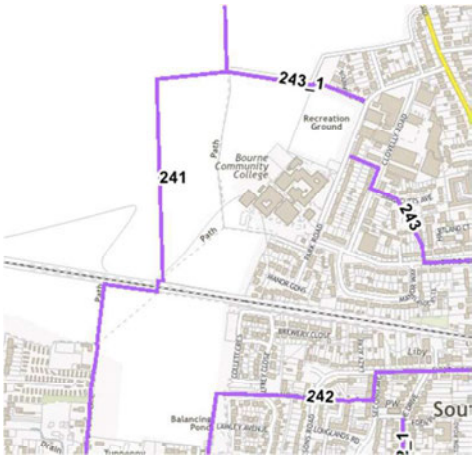
Intensified use of unsafe crossing

3.3.7 If no bridge to the south is secured then demand for footpath 241, linking Scenario 1 to the A259 via an uncontrolled at grade crossing of the railway, will intensify. The crossing is secured by wicket gates, although pedestrians are free to judge for themselves when it is safe to cross. This is acknowledged in paragraph 5.19, which also notes that this is a 'high risk crossing, as confirmed by Network Rail.' Paragraph 5.19 is correct, although the current wording does not acknowledge how significant a challenge this is.

[6] The allocation red line shows a red line that encompasses some land west of where the bridge is proposed. However, a previously produced Vision Document only shows enough land to build a bridge. This should be confirmed. The STANTEC report also notes that a greater number of homes can come forward to the east of the village (*ref: paragraphs 5.5.4 / 6.1.6*)

[7] The STANTEC report identifies daily traffic flows of 4,509 vehicles per day use Stein Road, compared with 1,107 per day using Inlands Road (*ref: paragraphs 2.4.2 and 2.5.2)*.

Image 0.6 WSCC PRoW footpath 241



Source: WSCC PRoW iMap (2024)

Image 0.7: Existing pedestrian crossing



Source: Google (2024)

3.3.8 The footpath provides a route to Emsworth and is therefore on a significant desire line.

3.3.9 In the absence of a bridge, i-Transport's experience is that <u>any</u> intensification of the existing use of this crossing is likely to face objection by Network Rail. Network Rail is an important and powerful consultee. They are likely to expect a safe (grade separated) alternative, given likely increases in walking demands.

3.3.10 Such an approach would be consistent with recent form on local planning applications. Network Rail initially objected to application for up to 200 homes on land South of Station Road, Barnham, West Sussex[8], because the proposal would have led to small increases in demand for two nearby level crossings. The Network Rail objection states:

> ***"Our expert assessment is that level crossing-specific engineering mitigations will not adequately mitigate the public safety risk. As such, the public rights of way over both level crossings must be formally closed (whether by way of formal stopping up, or through formal diversion together with the construction of a stepped footbridge) and the crossings physically barrier-closed. This relates to both crossings.***
>
> ***Network Rail is unable to conclusively comment, in this appeal, whether stopping up without diversion, would give rise to conflict with development plan policy in pedestrian and cyclist accessibility terms.***

[8] Application BN/142/20/OUT

However, with a very considerable body of experience, Network Rail considers it almost inevitable that any proposal for stopping up alone, without diversion (which would need to be the subject of a Grampian condition – whether on the basis of s.118A of the 1980 Act or s.247 of the 1990 Act) – would face strong local objection and perhaps also be resisted by the order-making authority, the County Council, in the first instance, as to effectively preclude onward confirmation of extinguishment by the Secretary of State. This leaves only the opportunity for a s.120 extinguishment order being made directly to the Secretary of State.

Proposals for the closure of the Crossings with a diversionary route (over stepped footbridge infrastructure) is likely to prove comparatively acceptable and achievable. Such proposals would require safe crossing infrastructure to be installed, for which there is available land at both Crossing sites, in the form of stepped footbridges." *(*ref: NR objection of 7 September 2021, paragraphs 3.10 to 3.13)

3.3.11 Network Rail was therefore clear that grade separation was the only long term solution for any development expected to intensify rail demand.

3.3.12 The objection also made it clear that the diversion / extinguishment will be expected prior to development or at a very early stage (*ref: paragraph 7.3*). Their objection was withdrawn only upon agreement to fund a railway bridge.

3.3.13 The planning application was allowed at appeal[9], with the Inspector supportive of the agreement that was reached:

"I have observed the standard of the current foot crossings at 'Birch' and 'West Barnham' and the alignment of the approaching rail lines and general speed of trains, bearing in mind the proximity of Barnham junction and station. Taking these factors into account I am concerned about the likely increased usage, particularly for vulnerable users requiring a longer crossing time.

Furthermore, I am concerned more generally that the very proximity of housing to the railway lines would tempt younger persons to explore, play and take risks by accessing the railway line at the unmanned 'Birch' crossing. For these reasons, without some form of mitigation there would not be safe and suitable access for all from the site via FP323 across the railway lines.

As the appeal has progressed, the appellant has agreed a form of condition with Network Rail that would preclude occupation of any dwelling on the appeal site until a necessary Order for the extinguishment or diversion of FP323 is in place. Based on the detail at Section 5 of Network Rail's objection (2 September 2021), the most likely form of a crossing at 'Birch' would comprise an overbridge." *(ref: paragraphs 56-58).*

3.3.14 There are clear parallels in Southbourne. Footpath 241 across the railway line will need to be extinguished. However, extinguishment will only be acceptable once a suitable alternative is in place The footpath cannot simply be taken away from existing users.

[9] Appeal Decision APP/C3810/W/21/3273087.

3.3.15 In other words, failing to deliver a bridge as an alternative route to the footpath is a significant risk to the delivery of homes at Scenario 1. The above development at Barnham would not have been able to proceed without a grade separated solution and there is no reason why Network Rail would respond differently to a proposal for 800 homes when the site has a footpath over a railway line on a major desire line. The wording of paragraph 5.19 needs to recognise this, and this must be carefully weighed in the assessment of which Scenario is to be progressed.

SECTION 4 Site Scenario Options – Scenario 2: Land to the East

4.1 Q5. Do you agree with the list of benefits and challenges set out above?

4.1.1 There are several inaccuracies within the DPD document, which are detailed below.

The reliance of the Scenario 2 on the bridge is overstated

4.1.2 Paragraph 5.29 considers the site to be strongly reliant on a vehicular bridge.

4.1.3 However, Scenario 2 could provide an alternative access north of the railway line (via Inlands Road) and a larger amount of land south of the railway. This means that Scenario 2 is less reliant on the bridge than Scenario 1. The challenges section should clarify this.

The issues at the Inland Road level crossing are not insurmountable

4.1.4 Paragraph 5.30 of the Consultation document raises concerns regarding the intensification of use of the Inland Road level crossing.

4.1.5 Traffic capacity is not the key issue at Inlands Road:

- It is significantly more lightly trafficked than Stein Road.
- Only a relatively small proportion of development traffic would use Inlands Road, even with development at Scenario 2.

4.1.6 The issue at Inlands Road is therefore one of safety rather than capacity. This is primarily because, unlike the Stein Road crossing, the Inlands Road crossing provides only single arm barriers. Therefore, whilst it is a controlled crossing, it is possible - but illegal - for drivers to pass through the crossing when the barriers are down.

4.1.7 Whilst the risk at such crossings is not as great as the risk at pedestrian level crossings, where an individual must take responsibility for their own decision on whether it is safe to cross, Network Rail understandably take safety issues at single barrier crossings very seriously.

4.1.8 In the absence of a road bridge, Network Rail are likely to seek an improvement to the crossing. They may do so even if a bridge is provided within Scenario 2 land because the level crossing is close to the strategic site and pedestrian demands are likely to increase. However, the solution is not necessarily a bridge.

4.1.9 A single arm level crossing on the B2132 North End Road / Yapton Lane, Yapton, West Sussex, was the subject of a similar upgrade in 2019. This is a much busier road than Inlands Road, carrying over 8,000[10] vehicles per day – far more than the circa 1,000 vehicles[11] per day on Inlands Road. The purpose of the upgrade was to address safety concerns around drivers illegally crossing when the barriers were down.

4.1.10 Even with this much higher level of traffic flow through that level crossing, Network Rail did not require a bridge to address the issues at that crossing.

Image 4.1: Yapton level crossing before upgrade



[10] https://www.networkrailmediacentre.co.uk/news/level-crossing-where-motorists-risk-their-lives-set-for-major-upgrade#:~:text=It%20means%20Yapton%20level%20crossing,barrier%20crossing%2C%20controlled%20by%20CCTV.

[11] Ref: Stantec report

Image 4.2: Yapton level crossing after upgrade



4.1.11 i-Transport will undertake further discussion with Network Rail about the need for and form of any improvements to the Inlands Road crossing. However, in i-Transport's experience, there is no reason why a similar improvement could not be undertaken on Inlands Road - there is land available adjacent to the crossing to deliver a similar improvement there.

4.1.12 Therefore, far from being a challenge or risk to Scenario 2, there is actually an opportunity to introduce double barriers (irrespective of whether a bridge is needed to address issues at Stein Road) and therefore address a safety concern. This opportunity will not be taken up if development at Scenario 1 comes forward because travel demands on Inlands Road would not change as that site is more distant from Inlands Road.

4.1.13 Paragraph 5.30 should be reworded to acknowledge that the safety issues at Inlands Road are not insurmountable and can be addressed with an upgraded crossing as they have been elsewhere. This is a unique opportunity to Scenario 2.

Vehicular Access from South Lane has been agreed in principle

4.1.14 Paragraph 5.31 states that:

> ***"A secondary access point using South Lane to connect to Stein Road may not be appropriate for a main access point because of existing considerations such as width of the lane and historic hedgerows. It would require further technical work and to consider the hedgerows and landowners of adjacent land to expand the road."***

4.1.15 This work has actually been undertaken. An access incorporating local improvements to the highway has been designed and agreed in principle with WSCC. Land outside the highway is not required to deliver the access and associated improvement. Further details regarding work on access are provided in the response to Question 6. Paragraph 5.31 should be corrected accordingly.

4.2 Q6. Are there other benefits and challenges that you feel should also be included?

4.2.1 In Scenario 2, there are several benefits which have not been reported within the DPD, which should be included.

The proposal is less reliant on a bridge than Scenario 1

4.2.2 This has been previously noted and explained and needs to be acknowledged in the DPD's benefits text. More homes could come forward at Scenario 2 in the absence of a bridge, which is an important benefit for the delivery of much-needed homes.

Vehicular accesses have been agreed in principle

4.2.3 A drawing of an extension of the South Lane access has been produced using topographic mapping and a model of the impact on the Stein Road / South Lane junction prepared. This has been subject to a safety audit and agreed in principle with WSCC.

4.2.4 Similarly, a signal controlled access arrangement for the main access onto the A259 Main Road has been designed, modelled, subject to a safety audit and agreed in principle with WSCC. This could potentially serve the full allocation site with a road bridge provided to the north.

4.2.5 This should be noted as a benefit of Scenario 2.

4.2.6 The drawings are included as **Appendix A** and illustrated below.

Image 4.1: South Lane access by Improving and Extending Carriageway

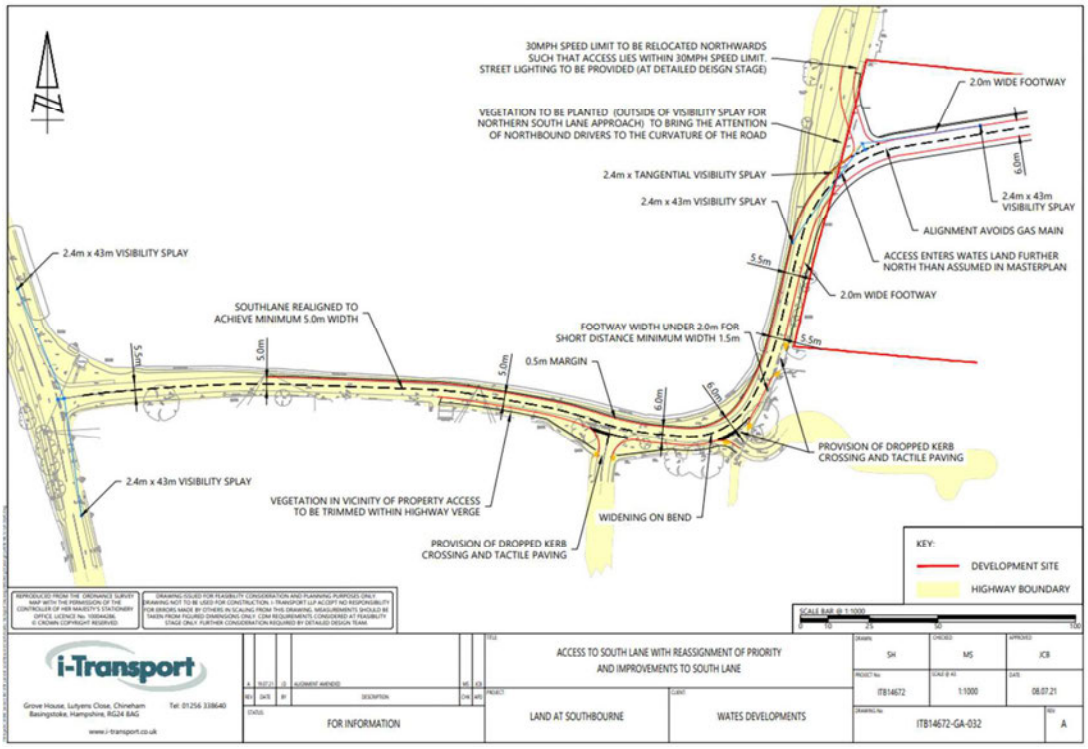
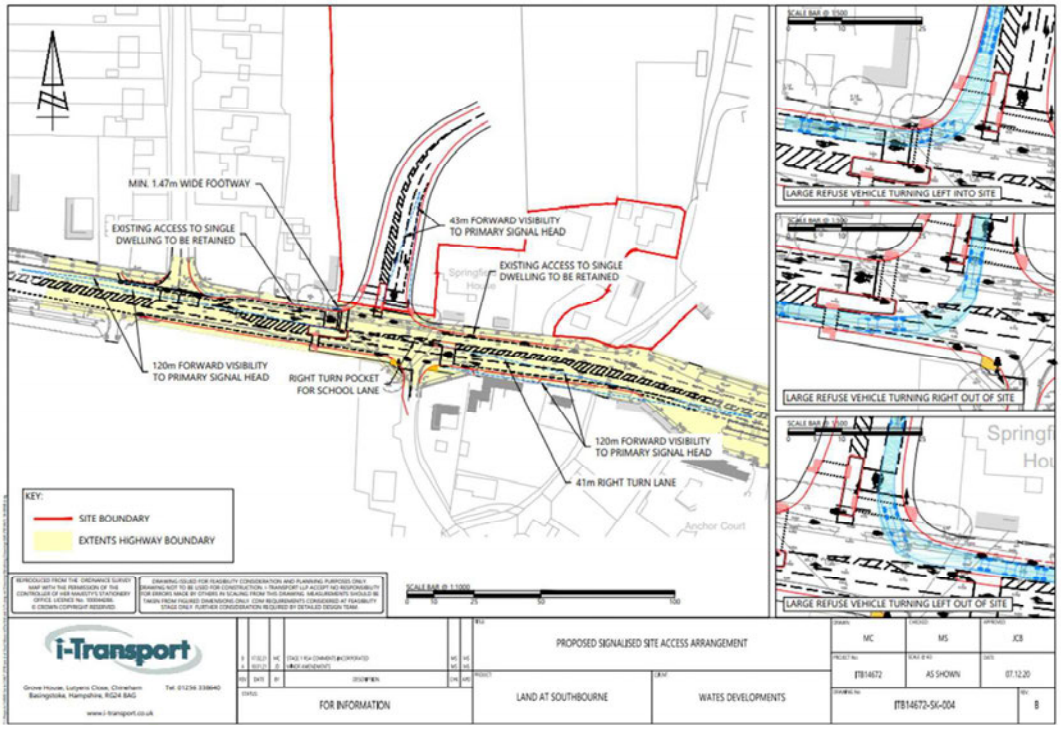


Image 4.2: Main Road Signal Controlled Access



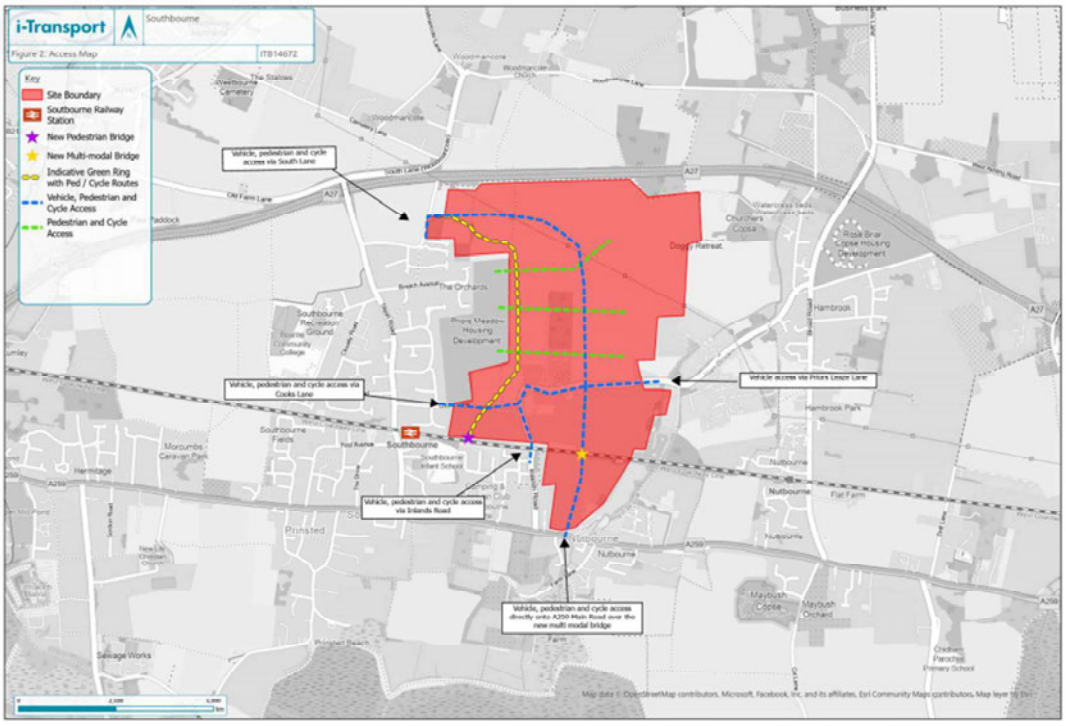
Accesses are deliverable and access proposals are well advanced

4.2.7 As well as providing for vehicles, other points of access for pedestrians and cyclists are deliverable on highway or right of way frontages within the allocation site. Scenario 2 is thus more permeable with eight potential points of entry into the site by all modes:

- South Lane.
- Three connections to the path around the edge of the Bloor Homes site[12].
- Cooks Lane.
- Priors Leaze Lane.
- Inlands Road.
- Main Road.

4.2.8 These all use land within the allocation and / or public highway. They can therefore be delivered to a high standard and will help reduce walking distances to the village for residents across the site.

Image 4.3: Site Access Points



[12] Ref: Bloor Homes Proposed Site Layout by Omega Architects 3009/C/1005/PL/F dated 14 June 2022.

Cycling improvements on Cooks Lane can be delivered

4.2.9 The eastern end of Cooks Land adjoins land within the allocation site, adjacent to the highway. A cycle route close to Cooks Lane can be provided, connecting the allocation land east of Inlands Road to the section of Cooks Lane within the built up area of Southbourne, and thus enhancing links to the station.

Land is safeguarded in Scenario 2 for the footing of a footbridge

4.2.10 Land can be provided within Scenario 2 land for a bridge which can be provided opposite a 'landing pad' which has been set aside at the Priors Orchard estate south of the railway. Scenario 2 can therefore deliver a pedestrian link across the railway, irrespective of whether the road link can come forward. This will be advantageous for access to the main bus stops and facilities on the A249.

4.2.11 The opportunities section of this report therefore needs to acknowledge that Scenario 2 has the potential to deliver an important north-south pedestrian link in the village.

Summary

4.2.12 Scenario 2 has a more secure access strategy:

- Key vehicular accesses have been agreed in principle.
- Multiple points of access can be achieved and will reduce walking distances to the village.
- Cycling improvements on Cooks Lane can also be delivered.
- A footbridge can be delivered across the railway.

4.3 Q7. In this scenario, what do you think would be the challenges or issues if there wasn't a vehicular bridge?

4.3.1 Scenario 2 is better able to come forward without a road bridge:

- Scenario 2 can deliver more homes to the south of the railway line without a vehicle bridge. This is acknowledged in the STANTEC report.
- Access onto Inlands Road provides an alternative route into the north of the site. This traffic would use the more lightly trafficked Inlands Road crossing, bringing further benefits:
  - The opportunity to introduce a double barrier crossing.

- The potential to introduce a link road without a bridge – and thus perhaps bring a bus route into the site[13].

- A footbridge can be delivered in any event, facilitating links to the south. Any footbridge to Scenario 1 will be in the same location as the road bridge and subject to the same constraints as the road bridge (*ref: Section 4)*.

4.3.2 The impact on Stein Road of any given quantum of housing north of the railway line will be reduced under Scenario 2.

SECTION 5 Site Scenario Options – Scenario 3: Mixed Scenario

5.1 Q8. Do you agree with the list of benefits and challenges set out above?

Reduced need for a bridge

5.1.1 Paragraph 5.43 notes that Scenario 3 will reduce the need for a bridge by spreading traffic around the village.

5.1.2 This point will need to be assessed through modelling work and paragraph 5.43 should make this clear. However, it is worth noting that Scenario 3 could deliver more homes without a bridge than Scenario 1, because the land in the east of the village:

- Provides more space for homes south of the railway.
- Can deliver homes via Inlands Road.

Risks to Inlands Road

5.1.3 In paragraph 5.43 of the Consultation document, concerns are raised regarding development around Inlands Road due to existing pressures on the existing level crossing. The last sentence in paragraph 5.43 suggests that the issues at Inlands Road can only be addressed by the bridge. As noted in Section 4, issues at similar crossings can be and have been addressed with alternative solutions to a bridge.

5.1.4 Inlands Road is more lightly trafficked than Stein Road and therefore less likely to require a bridge to alleviate congestion issues there. Any safety issue there can be overcome with a double barrier – something which development east of the village can deliver. Paragraph 5.43 needs to be reworded accordingly.

[13] Subject to discussion with operators.

Delivery of a bridge remains a risk to rights of way in the west of the village

5.1.5 Paragraph 5.43 also notes the additional footfall on the at grade pedestrian crossing of the railway line west of the village.

5.1.6 Whilst Scenario 3 only requires footbridges, the footbridge in the western side of the village will be at the same location as the road bridge under Scenario 1. Negotiations are therefore needed to secure this - unlike the footbridge in the east, where land has already been secured.

5.1.7 The risks to delivering homes in the west of the village are significant (as previously noted) and paragraph 5.43 should be reworded to reflect this.

5.1.8 If the bridge is not secured, then the development in the western parcel may need to be reduced in size (perhaps significantly) to lower the risk of an objection by Network Rail.

5.2 Q9. Are there other benefits and challenges that you feel which should also be included?

5.2.1 There are no comments on further benefits and challenges to be included for Scenario 3.

5.3 Q10. Which scenario do you feel should be selected as the preferred option for allocation? Please rank from 1st (most preferable) to 3rd (least preferable).

5.3.1 The scenarios are ranked as follows:

- 1st (Most Preferable): Scenario 2 – Land to the east.
- 2nd: Scenario 3 – Mixed scenario.
- 3rd (Least Preferable): Scenario 1 – Land to the west.

5.3.2 The reasons for this are as follows:

1 The Scenario 2 site is closer to many of the amenities in Southbourne.

2 It has a larger number of access points secured, minimising distances to facilities.

3 Land has been secured for a footbridge over the railway line, enhancing connectivity southwards.

4 It can deliver a higher number of homes before a road bridge becomes necessary because:

- It includes more developable land south of the railway.
- There is an opportunity for access via Inlands Road, reducing the impact on the busier Stein Road level crossing.

5 It provides an opportunity to upgrade the Inlands Road level crossing to a double barrier and perhaps bring a bus service into the site (via a loop road to South Lane).

5.3.3 Scenario 1 carries several understated risks including reliance on third party land to deliver or upgrade accesses and further negotiation being necessary to secure the road bridge. If not addressed, this carries the risk of an objection from Network Rail because of the likely intensification of demands on footpath 241 across the railway line. As explained further in Section 3, this is a potential showstopper.

5.3.4 Whilst this also applies to Scenario 3, the risk is lower because the quantum of development on the western side can be reduced so as to minimise increases in walking demand on the footpath. Discussion with Network Rail would be needed to confirm what quantum of development might be acceptable to them.

SECTION 6 Assessment Framework: Opportunities and Constraints.

6.1.1 Appendix A of the Consultation document provides further information regarding the opportunities and constraints which have been considered for the entire broad location for development area. Further questions are set out in this Appendix.

6.2 Q11. Do you agree with the list of opportunities or constraints set out above?

6.2.1 i-Transport raise the following comments on the list:

Both railway crossings are not equally unsafe

6.2.2 The eleventh bullet identifies both the Inlands Road crossing and the western PRoW crossing as being "*unsafe and uncontrolled pedestrian rail crossings*." The Inlands Road (all mode) crossing has barriers which drop when a train is approaching, thereby alerting pedestrians not to cross. It is only the crossing of footpath 241 which is completely uncontrolled The issue at Inlands Road is therefore much easier to address - with double barriers, which development at Scenario 2 could fund. The constraint should be reworded accordingly.

Multiple landowners are an issue either side

6.2.3 The final bullet and constraints notes 'multiple landowners in the east' as a constraint but does not acknowledge the land ownership issues that could arise as a result of the third-party land to the west, for example the parties involved in the delivery of the bridge to the south. This should be acknowledged.

6.2.4 Whilst the land in Scenario 2 has several owners, it is almost entirely under the control of Wates Developments - a single, experienced land promoter with a significant track record of delivering this scale of development.

6.3 Q12. Are there any others which should be mentioned in relation to either category?

6.3.1 The opportunity to bring forward a development with multiple points of pedestrian and / or cycle access both to the village and across the railway line should be noted and is a significant parameter on which the suitability of each scenario should be assessed.

6.4 Q13. Do you have any comments on the infrastructure requirements set out above, including how they could/should be most effectively delivered?

6.4.1 There are six transport infrastructure requirements listed on page 23 of the Appendix A of the consultation document. The list is a sensible initial starting point for the improvements that development in Southbourne should bring forward. Proposals will be worked up in further detail through discussions with West Sussex County Council. They can be implemented as set out below:

- **A27 mitigation contributions:** via Section 106 agreement.
- **Road level crossings or replacement with a road bridge:** via Section 106 agreement and in discussion with Network Rail.
- **Pedestrian and cycle rail crossing:** via Section 106 agreement and in discussion with Network Rail.
- **Bus service improvements or extended services;** Section 106 agreement with suitable mechanisms to transfer funding to either the highway authority or bus operator, depending on whether the services are commercially funded.
- **Cycle route improvements:** Section 106 agreement and / or Section 278 if within publicly maintained highway.
- **Footpath upgrades and pedestrian road crossings:** Section 106 agreement.

6.5 Q14. Do you have any comments on the assessment methodology?

6.5.1 Paragraph 4.21. of Appendix A sets out the criteria against which the scenarios have been assessed in transport terms. Bullet three is the location of the site in relation to existing bus stops.

6.5.2 This is inadequate as means of assessment of accessibility to buses. The assessment should take account of:

1 Walking distance to nearest high frequency (as a minimum, hourly) bus services.

2 Quality of walking routes to the bus stops.

3 Quality of bus stops.

4 Number of vehicular access points into site and likelihood of delivering a new or extended bus service (for example by designing a suitable road network).

6.6 Q15. Do you have any comments on the site assessment scoring set out above?

6.6.1 In light of the information which has been put forward in this consultation response, the section of table which is included in Section 5 of Appendix A of the Consultation document, entitled 'Transport and sustainable travel' has been reviewed. An amended version of the table is set out below, following the same colour coding.

Table 6.1: Re-scored Transport and Sustainable Travel Scores

Assessment Criteria	Scenario 1 (West)	Scenario 2 (East)	Scenario 3 (Mixed)
Transport and sustainable travel			
Providing active travel connectivity	Only one point of connection north of the railway for active travel has been secured, as delivering and / or improving additional access points will require third party land. If the rail bridge is not secured, there are significant safety concerns regarding the uncontrolled pedestrian crossing of the railway line.	There are numerous (eight) points of pedestrian and / or cycle access via rights of way and extensive site frontages onto public highway land.	Risks associated with the footpath across the railway line (241) could be mitigated with a reduced quantum of development in the western part of the parcel.
Potential for a bridge crossing the railway for pedestrians and cyclists	The bridge across the railway into Scenario 1 has not been secured. It will be needed before any housing can come forward to provide a safer route for pedestrians. An extinguishment order to close the footpath is unlikely to succeed	Whist a road bridge is not in place, land is safeguarded under planning application (ref. 24/01161) for the footing for a pedestrian and cycle bridge. Similarly, land can be made available to deliver the footings on the northern side.	Potential to deliver pedestrian cycle bridge to the east, and possibly the west, dependent upon the land swap.
Potential for a bridge crossing the railway for vehicles	Requires land swap to deliver a vehicular bridge.	Requires landowner collaboration to deliver a vehicular bridge	No vehicular bridge proposed.
Influence of vehicular bridge on traffic congestion	Providing a vehicular bridge would address congestion issues on Stein Road	Providing a vehicular bridge would address congestion issues on Stein Road. Development also provides the opportunity to upgrade the Inlands Road crossing to a double barrier and improve safety there.	Will not alleviate congestion but any development on both sides will need to come forward in such a way that they do not trigger unacceptable or severe impact on the level crossing (ref: NPPF paragraph 114)

Assessment Criteria	Scenario 1 (West)	Scenario 2 (East)	Scenario 3 (Mixed)
Development within 400m of a bus stop	The closest bus stop to the site actually only serves the school The site will thus be reliant on bus services on the A259 Main Road, over 1.5km away via existing walking routes. The site relates poorly to the nearest high frequency services on the A259, especially without the bridge	The site is closer to the closest high frequency services on the A259 (around 1.3km). The footbridge will reduce this for many residents. Access on Inlands Road and South Lane provide an opportunity to provide a new loop service into the site, even without a road bridge	The site will be reliant on bus services routing via A259 Main Road. The bridges, if delivered, will help reduce this. There are risks to delivery of a western footbridge. A loop road could serve the eastern part of the site.
Improvements in pedestrian / cycle access to the train station	Limited opportunity to improve pedestrian / cycle access to and from the train station. Pedestrian links into site need third party land	Opportunity to improve access to the station through enhancements to Cooks Lane using land to the south.	Opportunity to improve access to the station through enhancements to Cooks Lane using the land to the south. Risks to delivery of pedestrian accesses to the west will increase walking distances from the western side of the allocation.
Development located within 15 minutes from the station	The site is only able to meet this requirement should third party land be available to form a walking route.	This site meets the requirement	This site meets the requirement

Key:

Very Strong	Makes a significant positive contribution to the objective
Strong	Makes a positive contribution
Reasonable	Makes a reasonable / neutral contribution
Poor	Makes a negative contribution
Very Poor	Makes a significant negative contribution to the objective

6.6.2 The revised assessment methodology table shows that from a transport perspective, Scenario 2 is the most preferable option, Scenario 3 is the second most preferable and Scenario 1 is the least preferable option.

6.6.3 This is in contrast to the results shown in the Assessment Framework, despite the same criteria being considered. A table showing the Assessment Framework Scores and those explained above is provided in Table 6.2 below.

Table 6.21: Comparison of i-Transport and Assessment Framework Scores

Assessment Criteria	i-Transport			Assessment Framework		
	Scenario 1 (West)	Scenario 2 (East)	Scenario 3 (Mixed)	Scenario 1 (West)	Scenario 2 (East)	Scenario 3 (Mixed)
Providing active travel connectivity						
Potential for a bridge crossing the railway for pedestrians and cyclists						
Potential for a bridge crossing the railway for vehicles						
Influence of vehicular bridge on traffic congestion						
Development within 400m of a bus stop						
Improvements in pedestrian / cycle access to the train station						
Development located within 15 minutes from the station						

6.6.5 The Assessment Framework is overly positive in the scoring of Scenario 1 and negative in the scoring of Scenario 2. The scoring should be updated accordingly and the text of the DPD changed to reflect the points made in Table 6.1 and earlier in this note.

SECTION 7 Summary

7.1 In summary:

Challenges associated with Scenario 1 have not been acknowledged or given sufficient weight:

- Further negotiation between landowners is required to secure a bridge over the railway line.
- One of the pedestrian / cycle links in Scenario 1 requires third party land.
- A footpath into the site will also need improvement on third party land.
- Without these links pedestrians will be required to undertake lengthy diversions to the north to access local facilities in Southbourne.
- Any intensification of the existing uncontrolled pedestrian crossing of the railway line is likely to face objection from Network Rail. Extinguishment of the footpath without a bridge is unlikely to be an option.
- Without a road bridge, there will only be one vehicular access to the development, via Stein Road, accessed using the existing level crossing. Whilst evidence to date suggests that most of the 800 planned homes could come forward, this has yet to be confirmed through a detailed study.
- The absence of a bridge would lead to an isolated development, annexed to the edge of the village, with reduced potential for take up of walking and cycling due to longer distances to services.

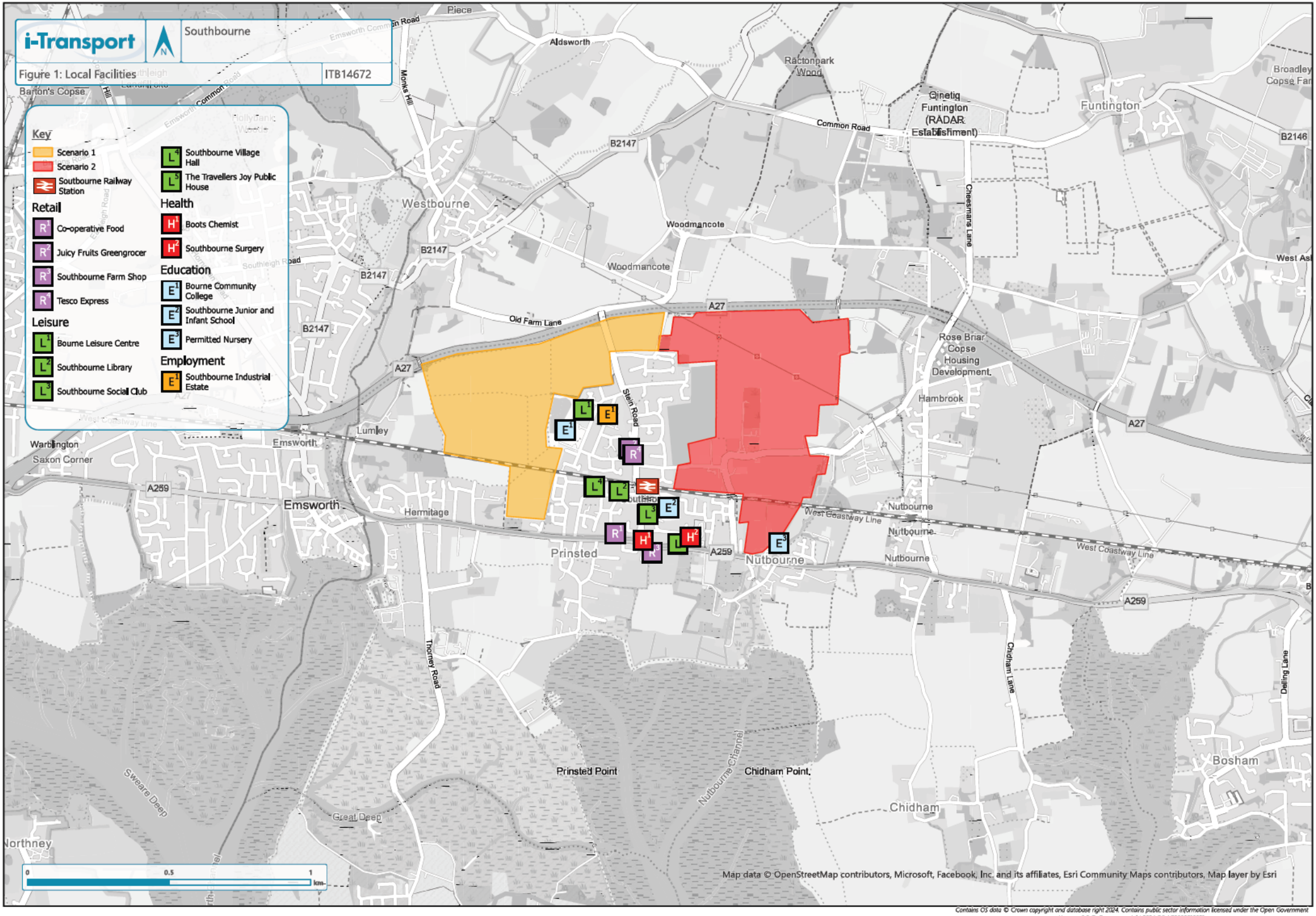
Benefits of Scenario 2 which have not been given appropriate recognition:

- The site is closer to facilities in Southbourne.
- It can bring forward numerous pedestrian and / or cycling connections.
- It can provide an improved route to the railway station, using land south of Cooks Lane.
- It can deliver a footbridge across the railway, irrespective of whether the road bridge can come forward.
- The Inlands Road level crossing can be upgraded to a double barrier in association with any development at the site. It is safety rather than capacity that is the constraint at this more lightly trafficked crossing. Similar upgrades have been undertaken at busier single barrier level crossings in West Sussex and there is no reason why such an upgrade cannot be undertaken at Inlands Road. Such improvements would not be secured under Scenario 1.
- The main access points on Main Road and South Lane have been designed and agreed in principle with West Sussex County Council.

- There is the scope to provide more homes at Scenario 2 before a road bridge over the railway is necessary. This is because:
  - More homes to the south of the railway line can be provided.
  - There is the potential for access to be gained from Inlands Road, alleviating pressure on Stein Road.
- Any such second point of access north of the railway line could facilitate access by bus into the Scenario 2 site, even in the absence of a bridge.

7.1.1 Against this background Scenario 2 should be the preferred option, whilst Scenario 3 should be the second most preferred, with Scenario 1 being the least preferred.

FIGURES



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i-Transport

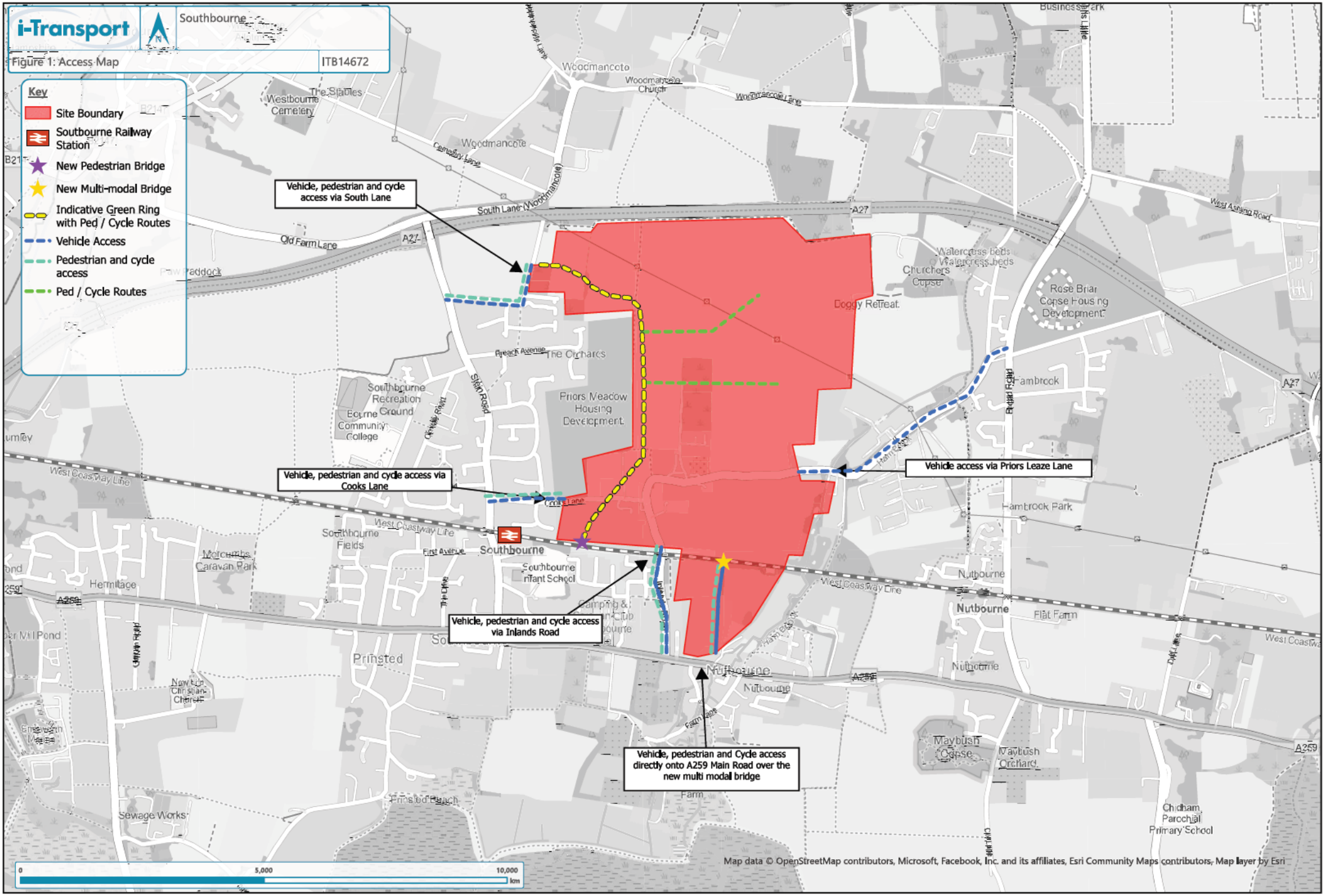
Southbourne

Figure 1: Access Map

ITB14672

Key

- Site Boundary
- Southbourne Railway Station
- New Pedestrian Bridge
- New Multi-modal Bridge
- Indicative Green Ring with Ped / Cycle Routes
- Vehicle Access
- Pedestrian and cycle access
- Ped / Cycle Routes



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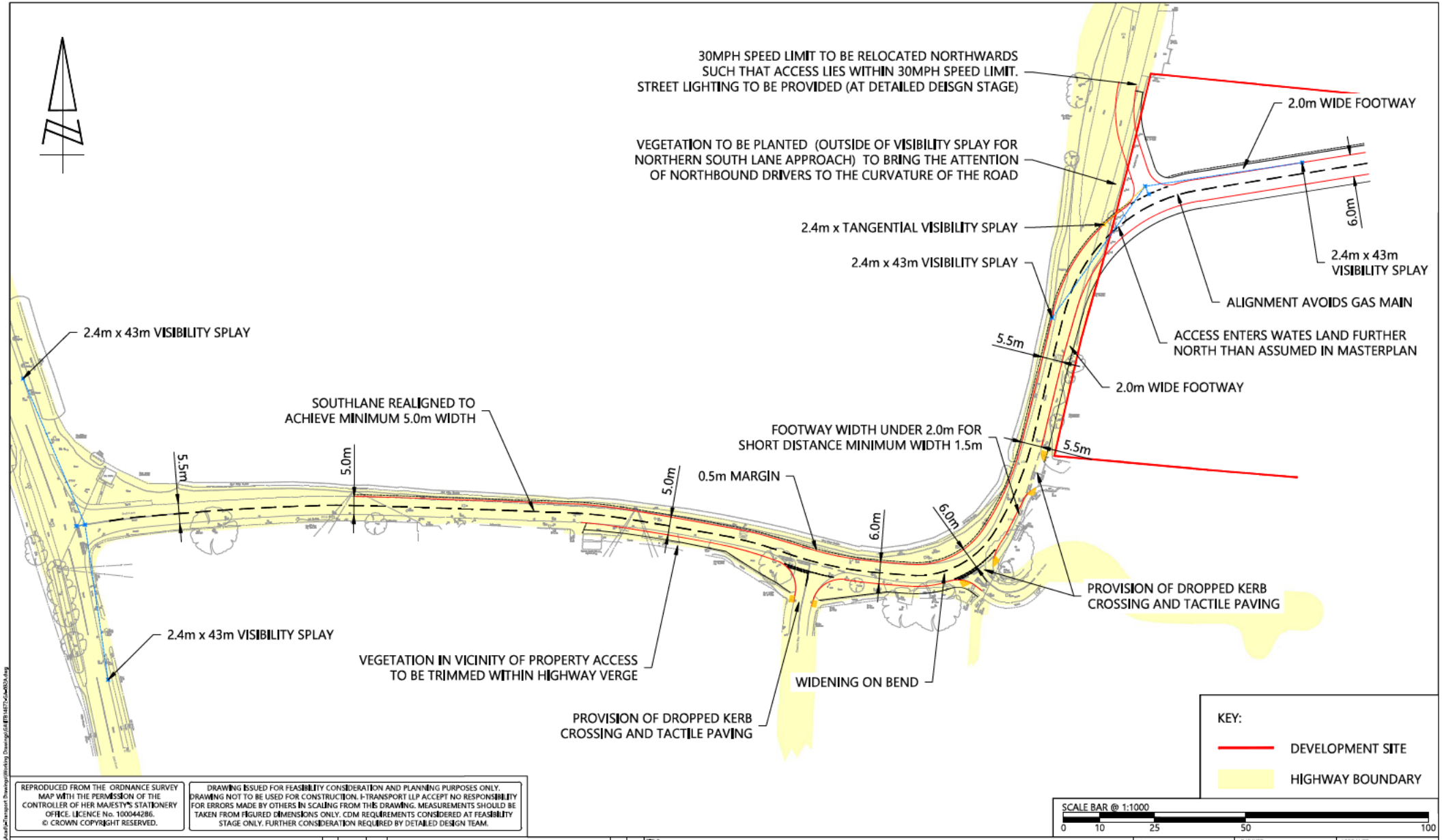
APPENDIX A. PROPOSED SITE ACCESS DRAWINGS



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Basingstoke, Hampshire, RG24 8AG
Tel: 01256 338640
www.i-transport.co.uk

REV	DATE	BY	DESCRIPTION	CHK	APD
A	19.07.21	JD	ALIGNMENT AMENDED	MS	JCB

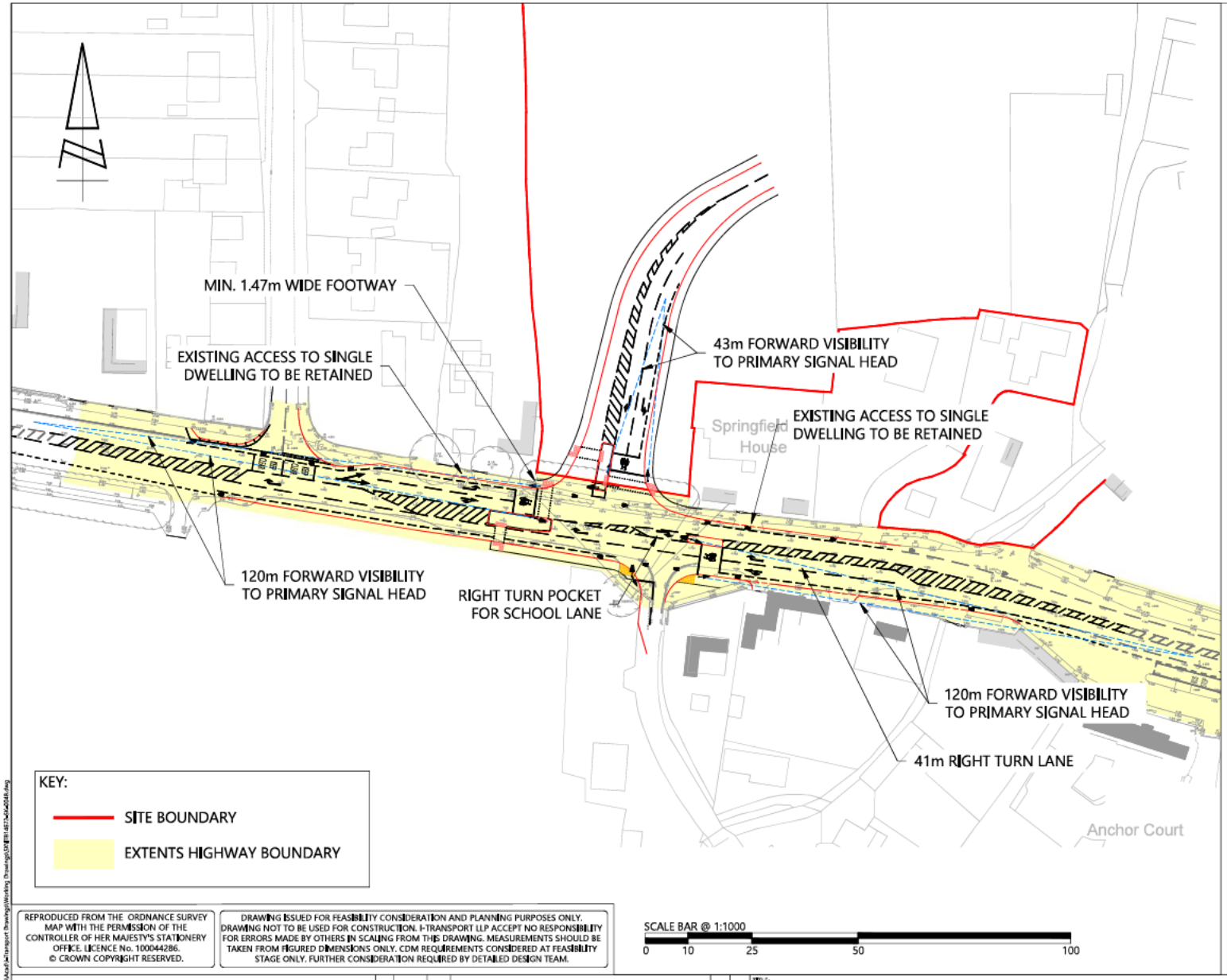
STATUS: FOR INFORMATION

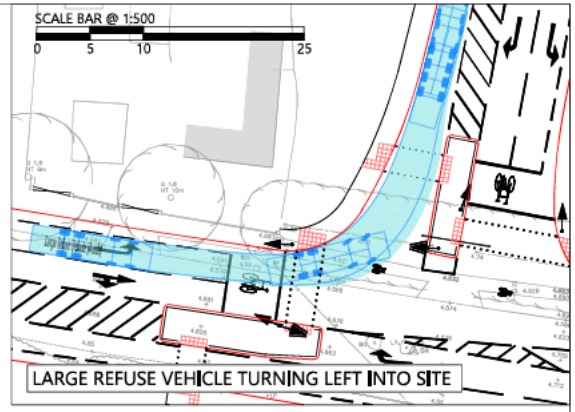
TITLE: ACCESS TO SOUTH LANE WITH REASSIGNMENT OF PRIORITY AND IMPROVEMENTS TO SOUTH LANE

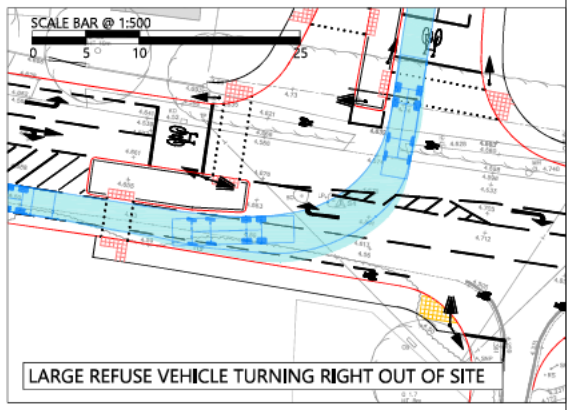
PROJECT: LAND AT SOUTHBOURNE

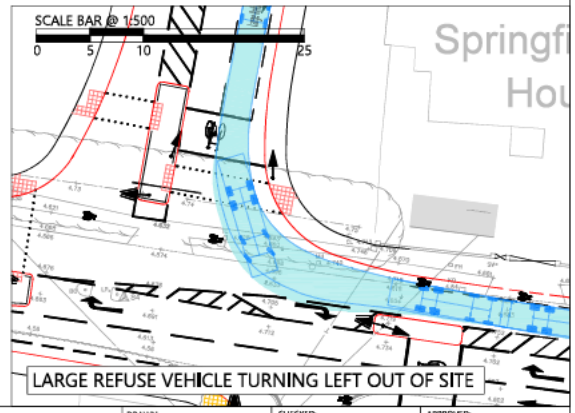
CLIENT: WATES DEVELOPMENTS

DRAWN:	CHECKED:	APPROVED:
SH	MS	JCB
PROJECT No:	SCALE @ A3:	DATE:
ITB14672	1:1000	08.07.21
DRAWING No:		REV:
ITB14672-GA-032		A









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REV	DATE	BY	DESCRIPTION	CHK	APD
B	17.02.21	MC	STAGE 1 RSA COMMENTS INCORPORATED	MS	MS
A	18.01.21	JD	MINOR AMENDMENTS	MS	MS

STATUS: FOR INFORMATION

TITLE: PROPOSED SIGNALISED SITE ACCESS ARRANGEMENT

PROJECT: LAND AT SOUTHBOURNE

CLIENT: WATES DEVELOPMENTS

DRAWN:	CHECKED:	APPROVED:
MC	MS	JCB
PROJECT No: ITB14672	SCALE @ A3: AS SHOWN	DATE: 07.12.20
DRAWING No: ITB14672-SK-004		REV: B

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Appendix 3: SLR Response

Landscape Representation to Southbourne Allocation Development Plan Documents

In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the following representation on landscape matters are made to the content of the Development Plan Documents (DPD).

Reviewed Documents

The following primary documents produced for the Regulation 18 consultation were referenced as part of the review:

- Southbourne Allocation Development Plan Document: Regulation 18 Consultation Main Document (CMD);
- Southbourne Allocation Development Plan Document: Regulation 18 Consultation Assessment Framework (CAF); and
- Southbourne Allocation Development Plan Document: Regulation 18 Interim Sustainability Appraisal (ISA).

Other reviewed documents of relevance:

- Southbourne East - Illustrative Framework Masterplan, Turley, June 2024;
- Local Plan Policies within Southbourne Parish Neighbourhood Plan (Pre-Submission Modified Plan 2014-2029) and Chichester Local Plan 2021-2039 (Proposed Submission);
- Chichester District Council's Landscape Gap Assessment, 2019; and
- Preliminary Landscape and Visual Appraisal: Southbourne, SLR Consulting, October 2020.

Landscape Response

Growth of Southbourne Village

ISA Statement 3.50 / CAF Statement 6.18: '*The eastern and western scenarios would lead to one-sided growth of the village, unbalanced with its original form and structure.' Conversely, Option 3 would create a more sympathetic growth structure that allows the village to expand more equally and performs well in this respect.'*

Response:

We disagree with the above statement that the eastern and western scenarios would lead to one-sided growth of the village and therefore that Option 3 is preferable. This is inconsistent with statements regarding settlement history and form within the DPD such as:

CAF 2.14: 'The shape of the settlement spreads out to the east with Inlands Road and north with South Lane

CAF 2.17: '*More recent developments have expanded the shape of the village, particularly to the east. Small developments have filled in gaps in the urban form with suburban arrangements of cul-de-sac roads and semi-detached houses*.'

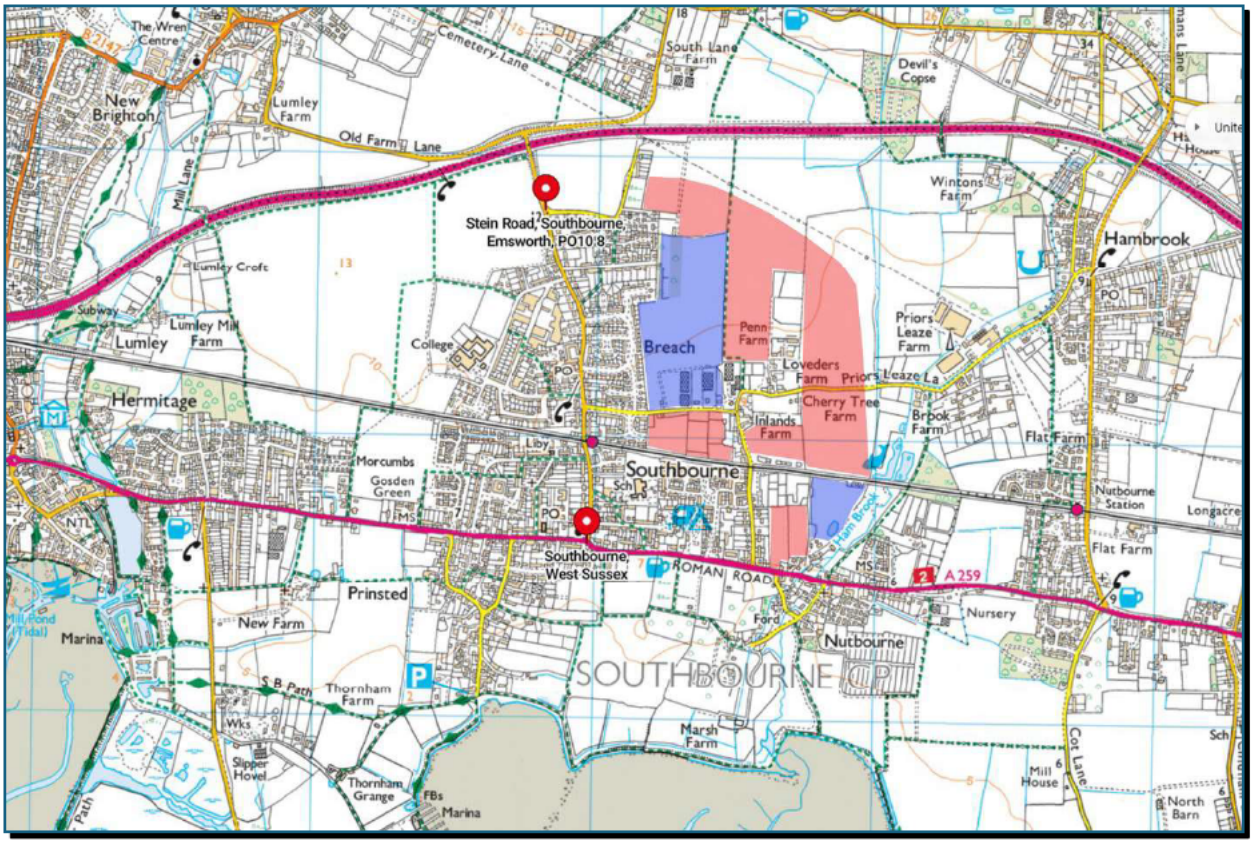
In our opinion, any development to the east would be in the direction of existing low-density development, meaning that the overall form of the settlement would not change substantially. The eastern scenario (Option 2) would in fact form a balanced and cohesive spatial growth

structure which aligns with the current growth pattern of the settlement. Current 'consented' residential schemes and the eastern scenario development proposals would serve to form an extension that continues to 'infill' gaps in the urban form as well as linking with existing good transport corridors (see figure 1 sketch below).

The proposed density and mix of housing development within the defined built-up areas is proposed to be 40 dwellings per hectare (dph) which would integrate well with the existing built form of Southbourne.

Any development to the west of the village 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. This has the potential to reduce the potential landscape and visual effects of development in this location.

Figure 1: Sketch showing consented schemes (blue) and eastern scenario (red)



Appropriateness and Promotion of 'Landscape Gap'

ISA Statement 6.18*: 'A small section of the development site is located within an identified landscape gap within proximity to Hambrook, however, a separating gap has been maintained to mitigate this impact. The scenario offers the potential to create characterful development through the retention and integration of historic orchards, existing hedgerows, and public rights of way.'*

Response:

We agree that this would offer potential to retain and improve upon the landscape setting and create parkland open space for community and wildlife benefit.

We would state further that for the eastern scenario (Option 2), this would lead to the creation of an extensive area of parkland, representing a large proportion of the total site area. This would therefore provide considerable space and great opportunities for green and blue

infrastructure (in line with Southbourne Parish Neighbourhood Plan Policy SB13) as well as improved biodiversity (in line with Southbourne Parish Neighbourhood Plan Policy SB14).

An LVA was carried out in 2020 which reviewed the Chichester District Council's Landscape Gap Assessment (May 2019) as well as local plan policies relating to the 'landscape gap'. This helped form the following recommendations and its inclusion within the mitigation proposals:

- *Carefully consider the perceived separation between Southbourne and Hambrook particularly as experienced along Priors Lease Lane, by train and on PRoW. Highways improvements and any associated street lighting could erode the rural nature of the gap and introduce suburbanising elements leading to a perceived coalescence. Careful site planning, retention of key views to the South Downs and mitigation planting could lessen these impacts. It is the quality and effectiveness of the separation that is crucial, not its size.*
- *Mitigation could be provided with improved Green Infrastructure, retaining and extending tree belts, opening up the Ham Brook watercourse, increasing the public rights of way and available open space and placing new housing away from areas where the gap is perceived.*

There are very positive opportunities for landscape character improvements as a result of the open space allocation which were considered in integrating the development into the landscape and being respectful to local character and heritage. This includes promoting ecological connectivity, outdoor recreation and sustainable movement and for mitigating climate change. This open space will provide an effective and high-quality landscape buffer and which would also vastly enhance the existing 'poor' condition landscape.

High recreational and biodiversity value open space also considers the coalescence with neighbouring villages such as Hambrook to the east and the requirement for a landscape gap between settlements to retain the existing landscape character and deliver part of the Green Ring. This will incorporate locally protected hedgerows and historic orchards and local green spaces as well as delivering a variety of green spaces, woodland, trees and hedgerows, water bodies, children's play areas and off-street footways, cycleways and bridleways.

This open space provision would retain a landscape corridor to the wildlife area to the east and has the ability to integrate existing water courses within a blue and green infrastructure strategy such as linking with the existing Ham Brook watercourse (rare chalk stream). This area is well located for providing a development buffer as well as strategically linking with the Southbourne Parish 'Wildlife Corridors' which run in a north to south direction, to the west of Hambrook (Southbourne Parish Neighbourhood Plan Policy SB14 – Biodiversity Policy Map).

It is interesting to note that the western scenario (Option 1) is entirely within the settlement gap and does not present the same opportunities as the eastern scenario (Option 2).

Impact on Landscape Character and views to Chichester Harbour NL and SDNP

CAF Statement 6.18: '*This eastern scenario is within the visibility zone of the SDNP and a potential moderate impact has been identified.'*

ISA Statement 3.46: '*With regard to Option 2, a preliminary Landscape and Visual Impact Assessment undertaken by the site promoter has identified a potential moderate impact on the National Park and moderate / minor impact on the National Landscape.'*

Response:

An LVA was carried out in 2020 which has identified there would be a moderate/minor impact on the setting of the SDNP and Chichester Harbour National Landscape (CHNL). However, the report also states that the scale of change in views from the SDNP is generally slight or

negligible, and consequently the overall visual effects are likely to be moderate at most and often minor. In fact, the availability of open and unobstructed views are generally very restricted.

Effects on the CHNL are also likely to be minor or less, since the proposed development would be largely screened by existing buildings and vegetation. Only very locally direct effects are reported to the CHNL which are caused by the southern site entrance (which is adjacent to the northern boundary of the CHNL).

The above comments in respect of the visual containment to the east, are in contrast to the western scenario in which its openness (wide open fields with low hedgerows, wide roads and a more compact residential area) mean that there are more unrestricted views potentially available. CAF Statement 2.16 '*The openness in character of the west is also attributed to unrestricted views to the north to the South Downs National Park.'*

The fact that an LVA was produced for the eastern scenario (Option 2) shows how serious this scheme was taken by the site promoter and how this has been key in influencing the iterative masterplanning design process. It is interesting to note that no LVA is available for the western scenario (Option 1) which does not imply that there are no impacts, but just that this was not considered in any detail by the site promoter.

Accommodation of existing gas pipeline

CMD Statement 5.28: *A key challenge of this scenario, is the need to accommodate an existing gas pipeline that runs through much of the north side of this scenario. The pipeline and consultation zone extends over the northern access point that would connect the development to Stein Road. Therefore, proposals for an access road would need to be consulted on.'*

Response:

We would highlight that the existing gas pipeline as well as the overhead power lines are within the northern / north-eastern section of the development boundary and therefore are wholly within the 'open space provision' area. In terms of the easements of these, they should not affect the scheme proposals with the northern access point being just outside the easements.

Further advantages of 'Land to the East' Scenario

The following observations regarding the eastern scenario having numerous advantages over the west and mixed scenarios are highlighted:

- Development in the eastern scenario does not involve land identified as part of the gap from the Landscape Gap Assessment (CDC, May 2019). As 3.49 of the ISA states, '*the western area is almost entirely within a settlement gap (identified landscape gap between Southbourne and Hermitage), whereas the eastern area is only partly within a gap*';
- As 3.15 of the ISA states, '*the eastern scenario is considered to perform more favourably than Options 1 and 3 as it does not result in the loss of any land within the Brent Geese Secondary Support Area*.' As figure 2.6 of the CAF also shows the area to the west is all secondary support area for Brent Geese, whereas the east does not perform the same role;
- As figure 2.4 of the DPD shows there is more agriculturally high value grade 1 land to the west, whereas land to the east is a mix of 1, 2 and 3;
- There are less PRoWS on the east of Southbourne, with therefore more opportunities to improve connectivity in the wider landscape;
- The proposals for the eastern area open space provision are strategically located for providing a development buffer as well as linking with the 'Parish Wildlife Corridors (Southbourne Parish Neighbourhood Plan Policy SB14 – Biodiversity Policy Map);
- The proposals for the eastern area contain a larger site area and therefore larger open space provision (buffer to settlements). Suitable Alternative Natural Green (SANG) space is proposed to be well above the suggested 15 hectares for 800 homes (CMD Statement 5.6); and
- Existing constraints such as a gas pipeline as well as the overhead lines are within the north / north-eastern section of the development boundary and therefore are within the 'open space provision' area.

Assessment Framework Scoring

On account of the above opportunities and clarifications, we would advise that scoring could be amended in respect of the Assessment Framework scoring (CAF Statement 4.27 and Chapter 5 Tables) for the following aspects:

Environment

- Development sites to provide sufficient open greenspace (in line with policy). 'Very Strong' rather than 'Strong'.
- Protect and / or mitigate existing wildlife and biodiversity. 'Strong' rather than 'Reasonable'.

Character

- Retention of landscape gaps between villages/settlements. 'Reasonable' rather than 'Poor'.
- Growth of the village sympathetically to its existing form and structure. Reasonable' rather than 'Poor'.

Summary and Conclusions

The above forms our response and representation on landscape matters on the content of the Development Plan Documents (DPD).

In summary, the following points are highlighted:

- Disagreement on the statement regarding the eastern scenario would leading to '*one-sided growth of the village'* and our opinion that the eastern scenario would in fact allow a sympathetic growth structure of the village based on a number of criteria;
- Reiteration of the fact that approximately 61 hectares of the site (eastern scenario) is proposed for extensive high quality open space provision for community, landscape and wildlife benefit. The fact that this is located strategically close to the county 'wildlife corridor' and high value biodiversity network such as the Ham Brook watercourse is also promoted.
- Clarification on the statements made on the 'effects' scoring for the eastern scenario on landscape character and visual amenity;
- Clarification on the statements made regarding the challenges (constraints) to the eastern scenario. This is specifically in regard to existing gas pipeline as well as the overhead power lines which are within the northern / north-eastern section of the development boundary and therefore are within the 'open space provision' area and not the built-up area;
- Further advantages of the eastern scenario are highlighted in the above; and
- Advised that scoring could be amended in respect of the Assessment Framework scoring tables.

We would therefore recommend that 'Option 2 – Land to the East' scenario is pursued.

Regards,

SLR Consulting Limited.

[redacted]

Neil Jones
Principal Landscape Architect

Appendix 4: Vision Document







Southbourne

High-quality, sustainable homes set within a new community parkland to the east of Southbourne

Vision Document
December 2024

Wates

Turley

Introduction

This Vision Document has been produced by Turley on behalf of Wates Developments to support the promotion of their land to the east of Southbourne. It is submitted as part of the Regulation 18 Consultation on the Southbourne Allocation Development Plan Document (DPD) which was published by Chichester District Council in October 2024.

The Proposed Submission Chichester Local Plan (Regulation 19) identifies Southbourne as a "Broad Location for Development" (BLD), consisting of approximately 1,050 new dwellings, local employment opportunities and supporting community facilities. The Southbourne Allocation DPD will complement the Local Plan with site specific policy considerations for Southbourne. Following the adoption of the Local Plan, the site boundaries and details of the site will be defined in the DPD.

The DPD sets out three development scenarios, each with the capacity for around 800 new homes and the ability to meet the policy requirements set out in Policy A13 of the Submission Local Plan. Whilst Policy A13 refers to 1,050 dwellings the DPD proposes to deduct newly consented dwellings from this figure and therefore plans for 800 new homes. This is a position which will be resolved through the ongoing Local Plan Examination process where a higher quantum of development was advocated to be planned for across the District by a number of parties.

The DPD's three scenarios are: Scenario 1 (Land to the West); Scenario 2 (Land to the East); and Scenario 3 (Mixed Scenario – with land to both the east and west included).

This Vision Document focusses on land that Wates Developments control – Scenario 2 (Land to the East) and covers:

- The Site
- Planning History
- The DPD and Neighbourhood Visions for Southbourne
- The site context and features
- Design Principles
- Concept Masterplan
- Landscape Framework
- A new community within a natural landscape setting
- Key Benefits

The site which is the subject of this Vision Document covers an area of 83.58ha. It stretches from the A27 in the north, to the railway line in the south. A further area of land is also included to the south, located to the north of the A259 and to the east of housing fronting onto Inlands Road. The eastern boundary of the site runs along South Lane in the north west and also along the edge of a consented scheme by Bloor Homes. A slither of land, currently used as a nursery school is excluded from the site. The eastern boundary is defined by the field patterns, existing trees and hedgerows. The site is currently used for agricultural purposes.

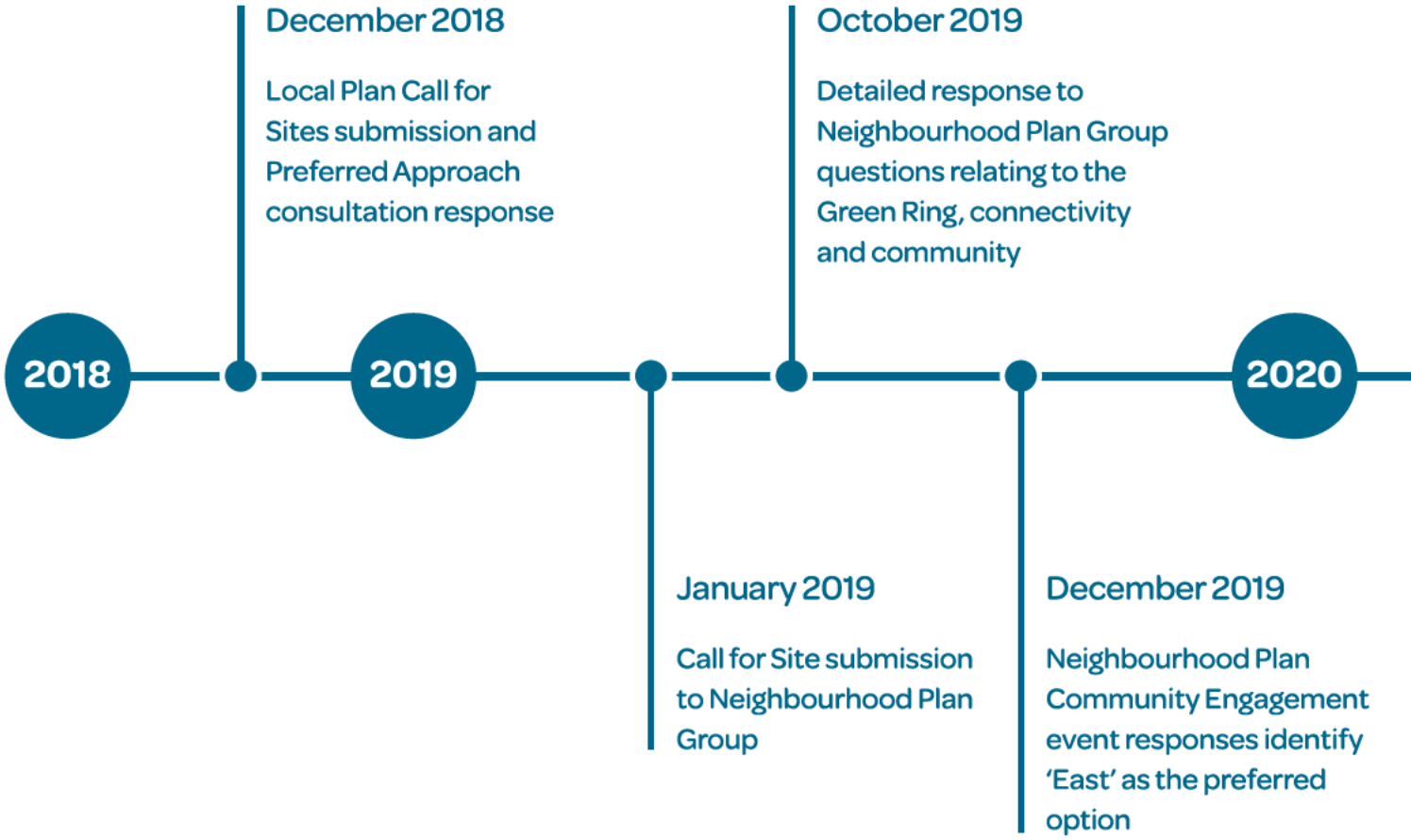
There are several housing schemes that either have consent or are proposed on land adjacent to the site. These are shown on the adjacent plan.

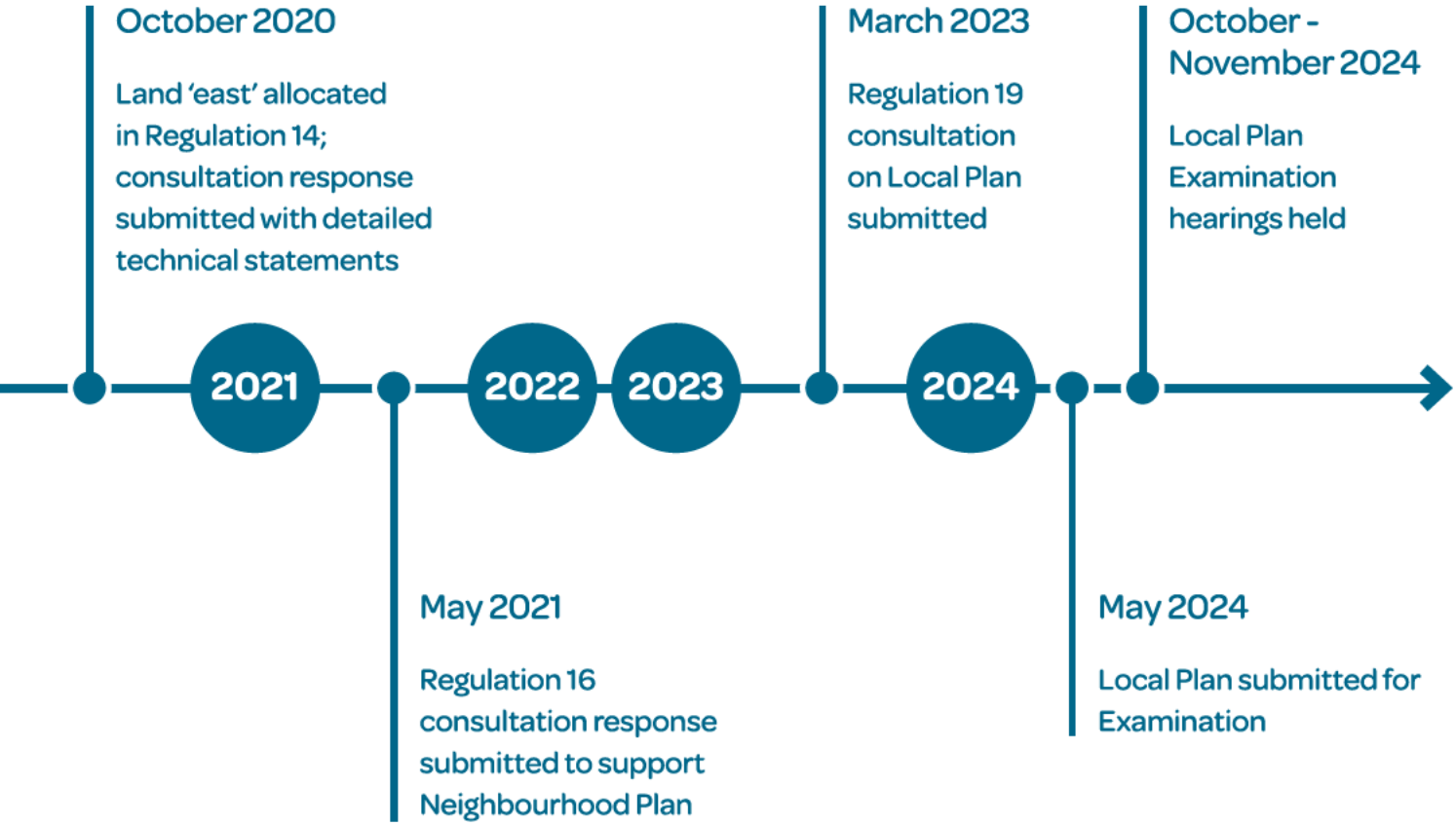



English Scheme
A27
Lane
Bloor Homes Scheme
Chichester Grain
PHN Scheme
Loveders Nursery School
Inlands Road
Elivia Land
West Coastway Line
Seaward Properties Scheme
Metis Land
Village Centre
Main Road - A259

Planning History

Land to the east of Southbourne has been promoted through both the Local Plan and Neighbourhood Plan processes, both individually by Wates and previously as part of a larger consortium. Wates are committed to continuing to engage with the local authority, neighbourhood plan group, local community and other key stakeholders in the development of proposals for the site.




October 2020
Land 'east' allocated in Regulation 14; consultation response submitted with detailed technical statements
2021
May 2021
Regulation 16 consultation response submitted to support Neighbourhood Plan
2022
2023
March 2023
Regulation 19 consultation on Local Plan submitted
2024
May 2024
Local Plan submitted for Examination
October - November 2024
Local Plan Examination hearings held

The Vision

The Southbourne Allocations DPD sets out a vision for the development of Southbourne, as follows:

"To grow Southbourne in a comprehensive manner that supports a vibrant and sustainable community. It will be well supported by services and new and existing development will be seamlessly integrated, while embracing its existing character, landscape and ecological assets. Southbourne will connect people with nature, featuring a network of inclusive open space and a safe and inviting Green Ring. Active travel will be promoted through direct and convenient connections. Southbourne will offer a diverse living environment. The project will deliver essential services, diverse housing options, and modern infrastructure, fostering a sustainable, connected, and dynamic community".

The DPD also sets out a series of objectives, as follows:

- Integrated and well serviced community
- Housing for all
- Transport and sustainable travel
- Climate change and moving towards net zero carbon living
- Environment
- Character



The Neighbourhood Plan also sets out a vision for Southbourne as follows:

"Southbourne will be a community as well as a place, recognised and admired as an exemplar of modern living in a rural Sussex setting. It will be the focal point for the Bournes area, a valued harbour community within the Chichester Harbour Area of Outstanding Natural Beauty and a gateway to the South Downs National Park. Southbourne will be an inclusive, mixed community, enjoying healthy, nature-loving, zero carbon living"



The Site

Key features of the site are:

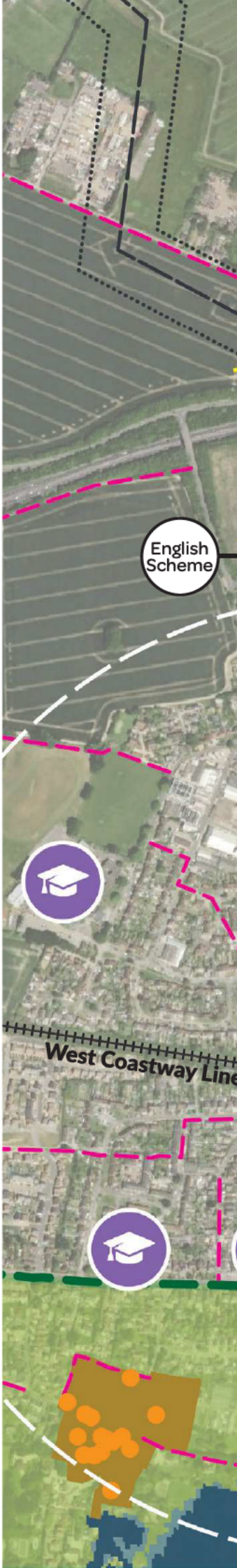
- Covers an area of 83.72ha.
- Flat, relatively open site currently used for agricultural purposes.
- High voltage powerline running across the north of the site with 60m offset.
- Gas pipeline with a substantial easement also runs across the north of the site.
- Watercourses running across the east of the site with a small area within floodzone 2 and 3 in the south eastern corner.
- An existing Public Right of Way (PROW) runs north-south along the western side of the site, with a further PROW to the east.
- Areas of ancient woodland in the wider area, but not within the site.
- Potential vehicular access points can be taken from South Lane to the north west as well as from the A259 to the south (via a new railway bridge).
- Opportunities for further pedestrian and cycle connections.

Relationship to surrounding land uses:

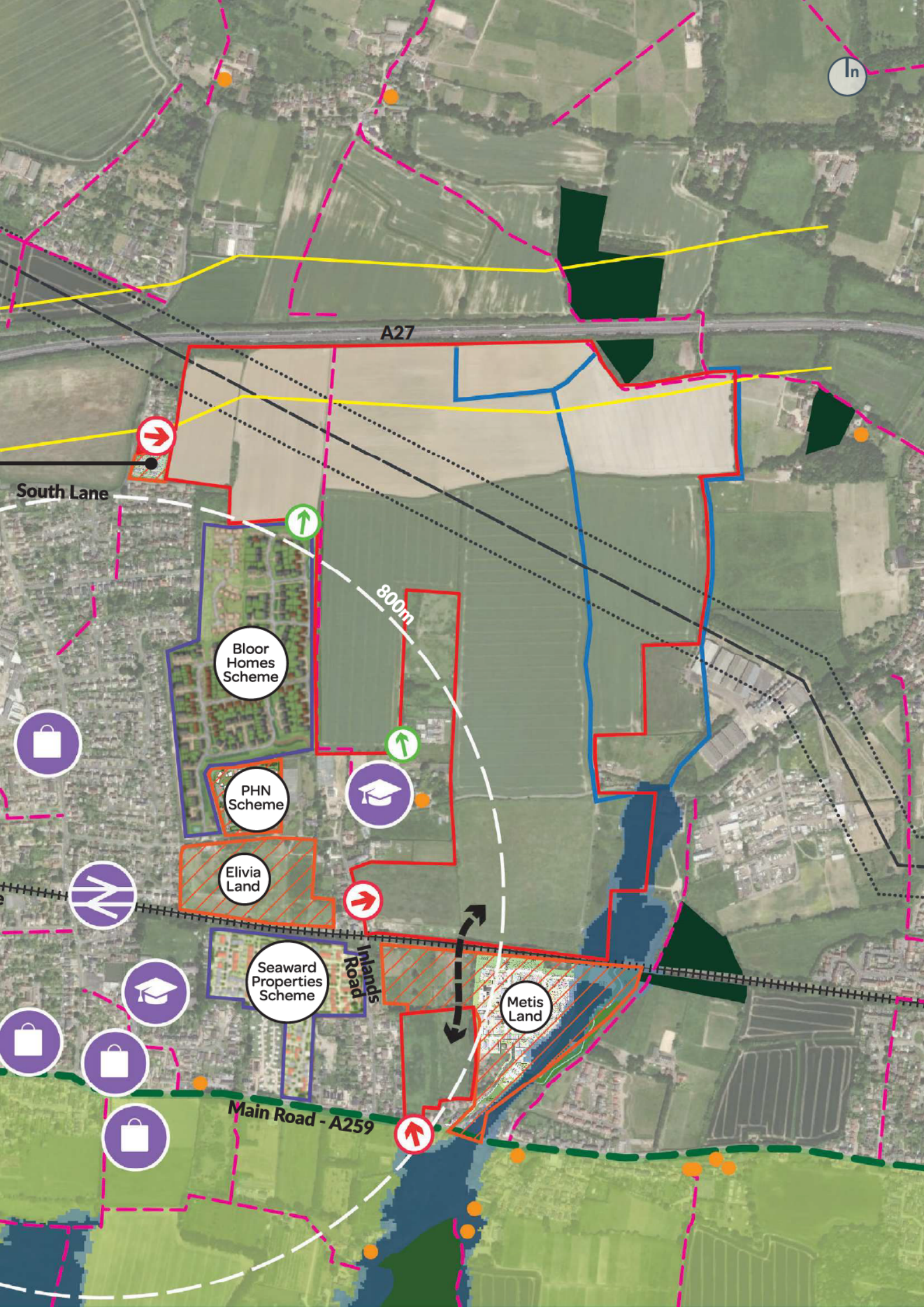
- Site lies within a short walk of Southbourne Railway Station. Trains from here connect to London Victoria, Brighton, Southampton and Portsmouth.
- The site is a walkable distance from the high frequency bus service, 700 Coastliner between Chichester, Havant and Portsmouth. The development of 800 homes with multiple accesses provides an opportunity to bring new services into the village.
- Site lies approximately 1,200m from the village centre, containing a convenience store, farm shop, pharmacy and a church.
- Chichester Harbour National Landscape is located to the south of the A259.

Relationship to proposed / emerging land uses

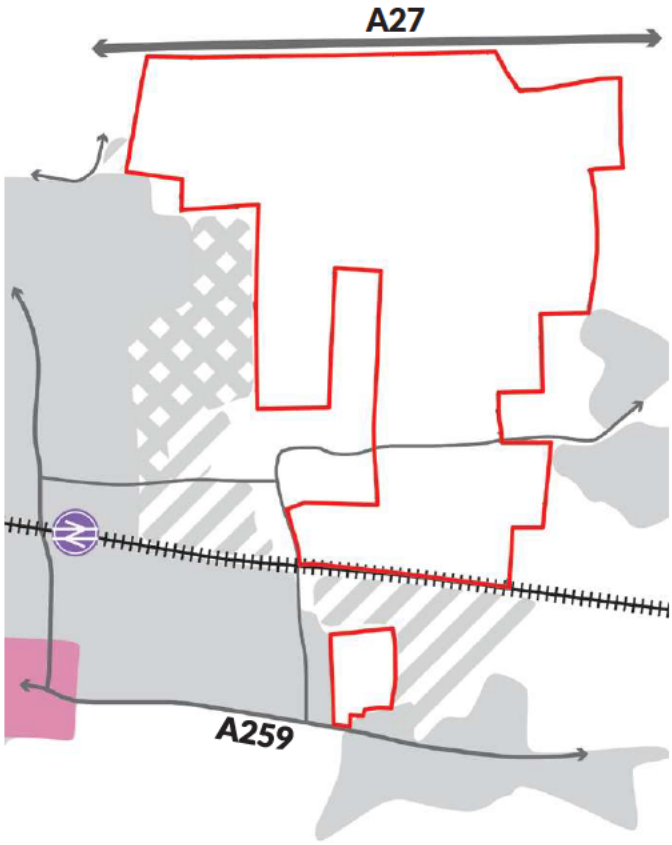
A number of proposed and emerging housing sites are being developed to the east of the village, as shown on the plan opposite.



- Site Boundary (83.72 Ha)
- Public Rights of Ways (PROWs)
- Cycleway Network
- Rail Network
- Potential new bridge (subject to viability
- Potential Site Access
- Potential Pedestrian Access
- Consented Residential Sites
- Emerging Residential Sites
- Power Line with easement
- Gas Pipeline easement
- National Landscape
- Ancient Woodlands
- Listed Buildings
- Conservation Areas
- Flood Zone 2
- Flood Zone 3
- Watercourse
- Schools
- Shops
- Southbourne Railway Station


A27
South Lane
800m
Bloor Homes Scheme
PHN Scheme
Elivia Land
Seaward Properties Scheme
Inlands Road
Metis Land
Main Road - A259

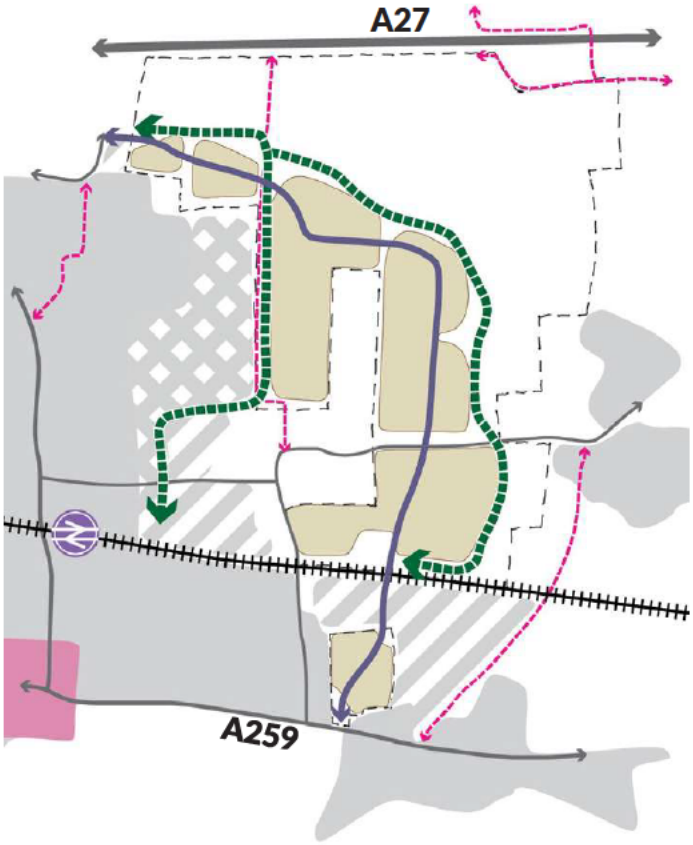
Design Principles



Site Area

Having understood the site's features and context, a series of design principles have been developed showing (through layers) how a sustainable new neighbourhood can be created based on the key principles of sustainable movement, multi-functional landscape and mixed land uses.

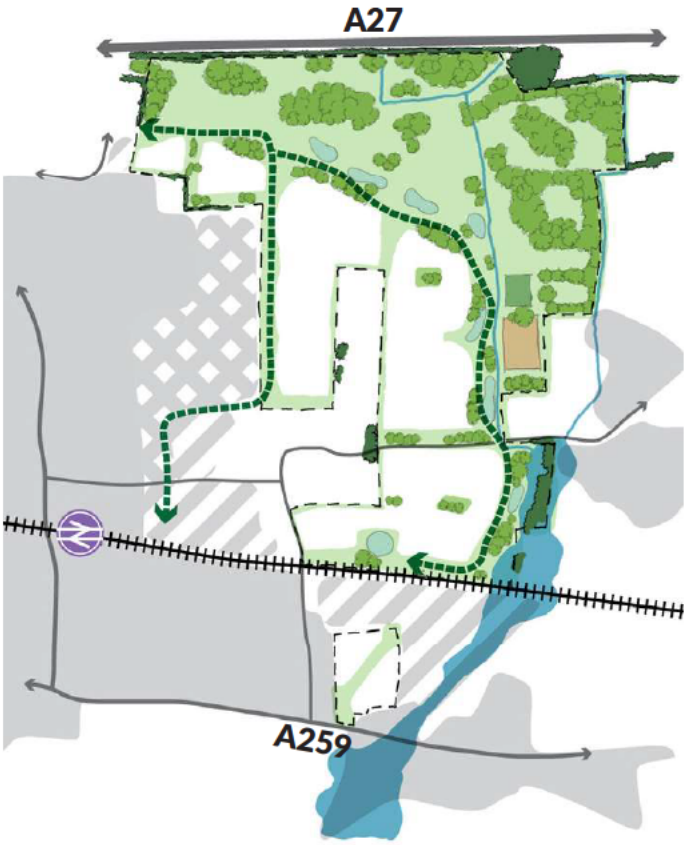
- Site Boundary
- Railway
- Railway Station
- Existing Street Network
- Village Centre
- Consented Housing Sites
- Emerging Housing Sites

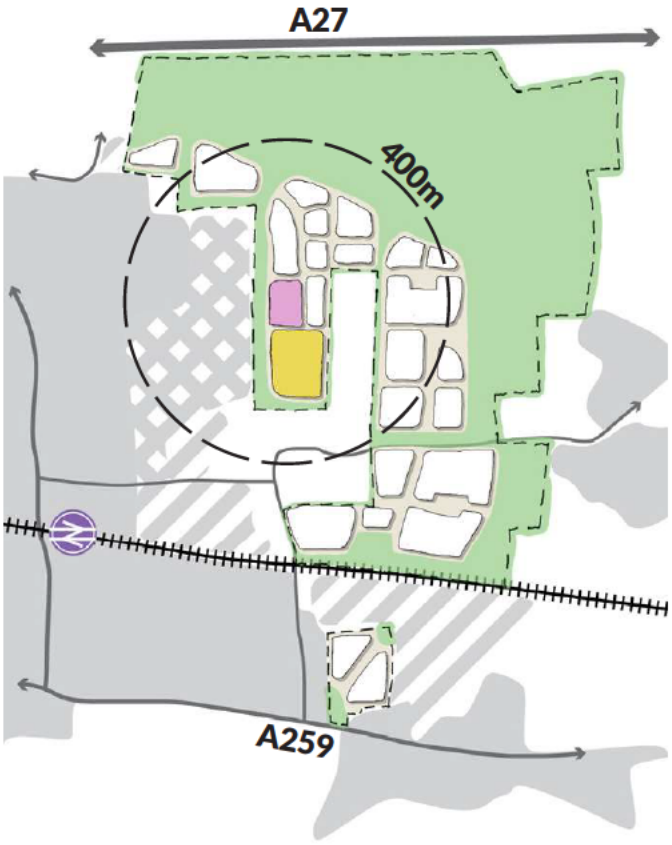


Sustainable Movement

- Create a large segment of the Green Ring around Southbourne
- Connect into existing and new foot and cycle links
- Provide new north-south avenue (A259-South Lane)

- Site Boundary
- New North-South Avenue
- Railway
- Railway Station
- Existing Street Network
- Village Centre
- New Green Ring
- Public Right of Way
- Consented Housing Sites
- Emerging Housing Sites





Multi-functional Landscape

- Create new open parkland for the village
- Provide multi-functional space including play spaces, allotments and areas for BNG
- Mitigate the impact of flooding through sustainable drainage

Mixed Land Uses

- Provide for much needed housing within a landscape setting
- Create a walkable community hub, for day to day needs
- Allow the opportunity for a new primary school to serve the site / wider area

- Site Boundary
- Green Infrastructure
- Flood Risk
- Allotments
- Play Area
- SuDS
- New Tree Planting
- New Green Ring
- Railway Station
- Consented Housing Sites
- Emerging Housing Sites

- Site Boundary
- Primary School
- Community Hub
- Residential
- Green Infrastructure
- Railway Station
- Consented Housing Sites
- Emerging Housing Sites

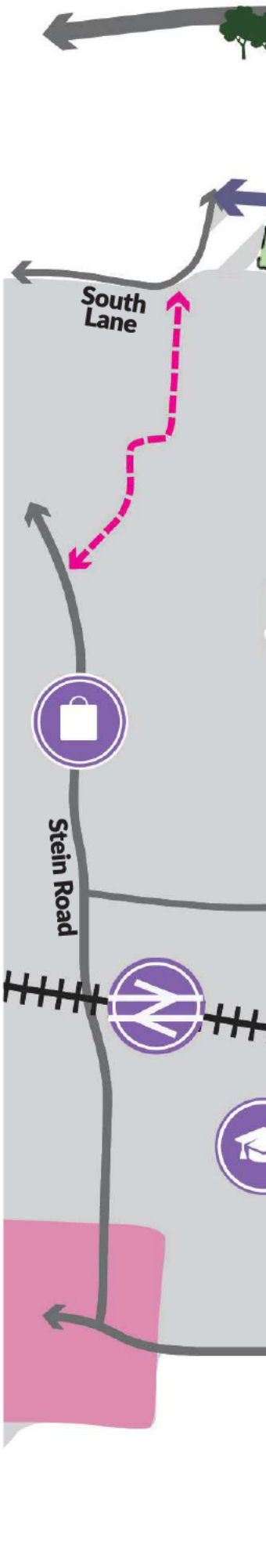
Concept Masterplan

The plan, opposite, brings the design principles together to create a masterplan for a sustainable new neighbourhood to the east of Southbourne.

- Key features of the masterplan are:
- New parkland across the north and east of the site featuring tree planting, a play area, sustainable drainage features and allotments.
- Creation of a Green Ring which also acts as an active travel corridor.
- New homes.
- New primary school.
- New Community Hub.
- Central North-South Avenue including a potential new bridge (subject to viability) over the railway line.
- Improved connections to Public Rights of Way both on and adjacent to the site.
- Improved pedestrian and cycle connections to Southbourne Railway Station and local amenities.
- Potential to improve cycling facilities on Cooks Lane and provide land for a crossing of the railway.
- Potential to provide new bus route / bus stops within the village using loop road arrangement.

Key

- Residential
- Community Hub
- Primary School
- Green Infrastructure
- Allotments
- Recreation
- Existing Urban area
- Consented Housing Sites
- Emerging Housing Sites
- New Central Avenue
- Potential Access Point
- Potential Railway Bridge
- New Green Ring
- Public Right of Way
- Existing Street Network
- Existing Railway
- Upgrade to Inlands Road level crossing
- New SuDS Features




A27
Cooks Lane
Inlands Road
A259

Land Use

The site covers an area of 83.72ha.
Within this, the masterplan shows:

20.0ha Residential (allowing approximately 800 homes)

0.7ha Community Uses (this could comprise a community centre, local shop, cafe, etc)

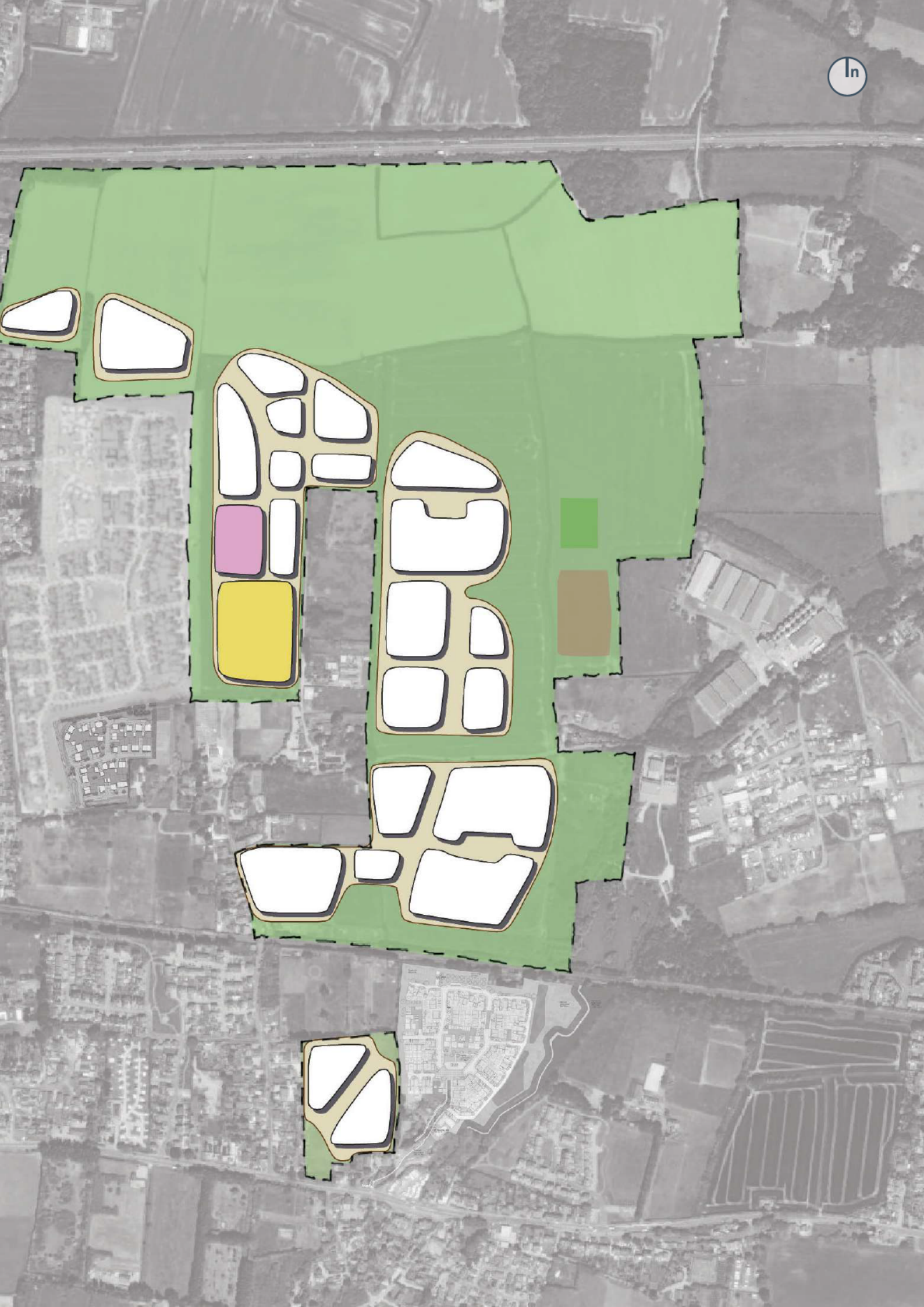
2.0ha Primary School

61.0ha Green Infrastructure

- Attenuation Basins
- Natural/Semi Natural Open Space
- Amenity Open Space
- Allotments
- Recreation area
- New tree and shrub planting



Residential
Community Hub
Primary School
Green Infrastructure
Allotments
Recreation



Landscape Framework

The site will deliver extensive parkland for community and wildlife benefit and will incorporate an area of green/blue infrastructure over and above the minimum required for biodiversity net gain. The open space can incorporate the Green Ring active travel loop, water bodies, species-rich grassland, hedgerows and tree planting including woodlands.

High recreational and biodiversity value open space considers the coalescence with neighbouring villages such as Hambrook to the east and the requirement for a landscape gap between settlements to retain the existing landscape character and deliver a substantial part of the Green Ring.

This open space provision would also retain a landscape corridor to the wildlife area to the east and has the ability to integrate existing water courses within a blue and green infrastructure strategy such as linking with the existing Ham Brook watercourse (rare chalk stream). This area is strategically located for providing a development buffer as well as linking with the Southbourne Parish 'Wildlife Corridors' which run in a north to south direction, to the west of Hambrook.a

This natural green open space will provide an effective and high-quality landscape buffer and an improved landscape framework. Planting of woodlands, tree and shrub belts will serve to soften and filter views of the urban edge as well as unifying disparate suburban elements. The open space also includes allotment provision and play space.

The adjacent plan shows:

A: *Restoration and creation of new field tree and hedgerow boundaries and the creation of new suburban woodlands to improve the generally poor condition landscape and complement the local character of open and generally intensively farmed landscape. This will benefit recreation, restoration and improvement to landscape character as well as for linking with existing woodlands to the north, towards the South Downs National Park (SDNP) and wildlife corridor to the east.*

B: *Woodland and tree belt buffer planting to strengthen landscape framework and filter views of the urban edge.*

C: *Species-rich grassland areas to improve landscape character and diversity.*

D: *Tree planting to access road to enhance both the visual and biodiversity value.*

E: *Improved Green / Blue Infrastructure such as retaining and extending tree belts, creation of new water bodies which link with the existing Ham Brook watercourse, increasing the public rights of way and available open space and placing new housing away from areas where the gap is perceived.*

F. *Retention of open views towards the SDNP.*

G. *Allotment provision for local food production.*

H. *Play space for children and young people.*




F
F
A
C
D
E
B
G
H
B
E
D
Site Boundary
Public Rights of Way
Cycle Way Network
Site Access
Potential Site Access
Potential Pedestrian Access
Attenuation Areas
Primary Street
Development Area
Primary School
Community Centre
Green Ring
Blue Corridor
Potential Railway Bridge

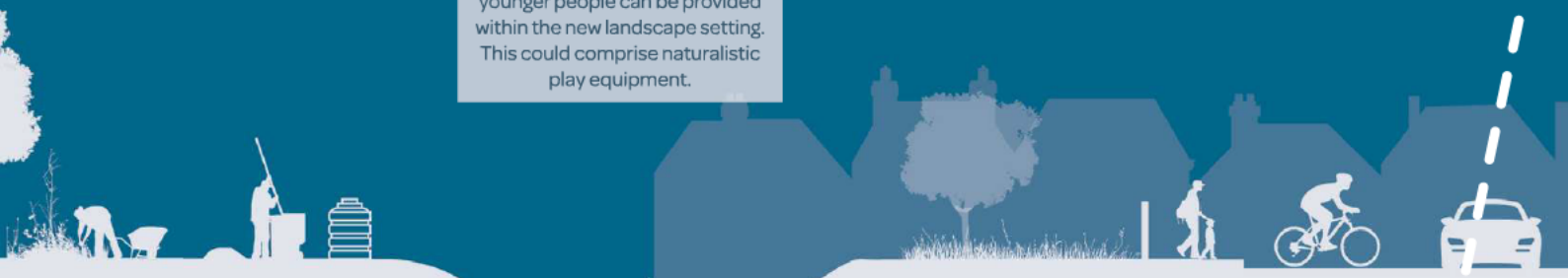
"A new community within a natural green setting"

It is envisaged that the scheme will be very much landscape led, opening up wonderful opportunities for new parkland, play space, growing space and active travel corridors. It will also be resilient and responsive to climate change with the use of sustainable drainage systems and bio-diversity net gain.

There is the opportunity to provide allotments or even a community orchard on the site creating local food production and opportunities to socialise.

New playspace for children and younger people can be provided within the new landscape setting. This could comprise naturalistic play equipment.

There is a wonderful opportunity to create a large part of a new Green Ring around Southbourne, acting as a new active travel corridor and recreational route.











Naturalistic open space



Biodiversity net gain



Wildlife enhancements



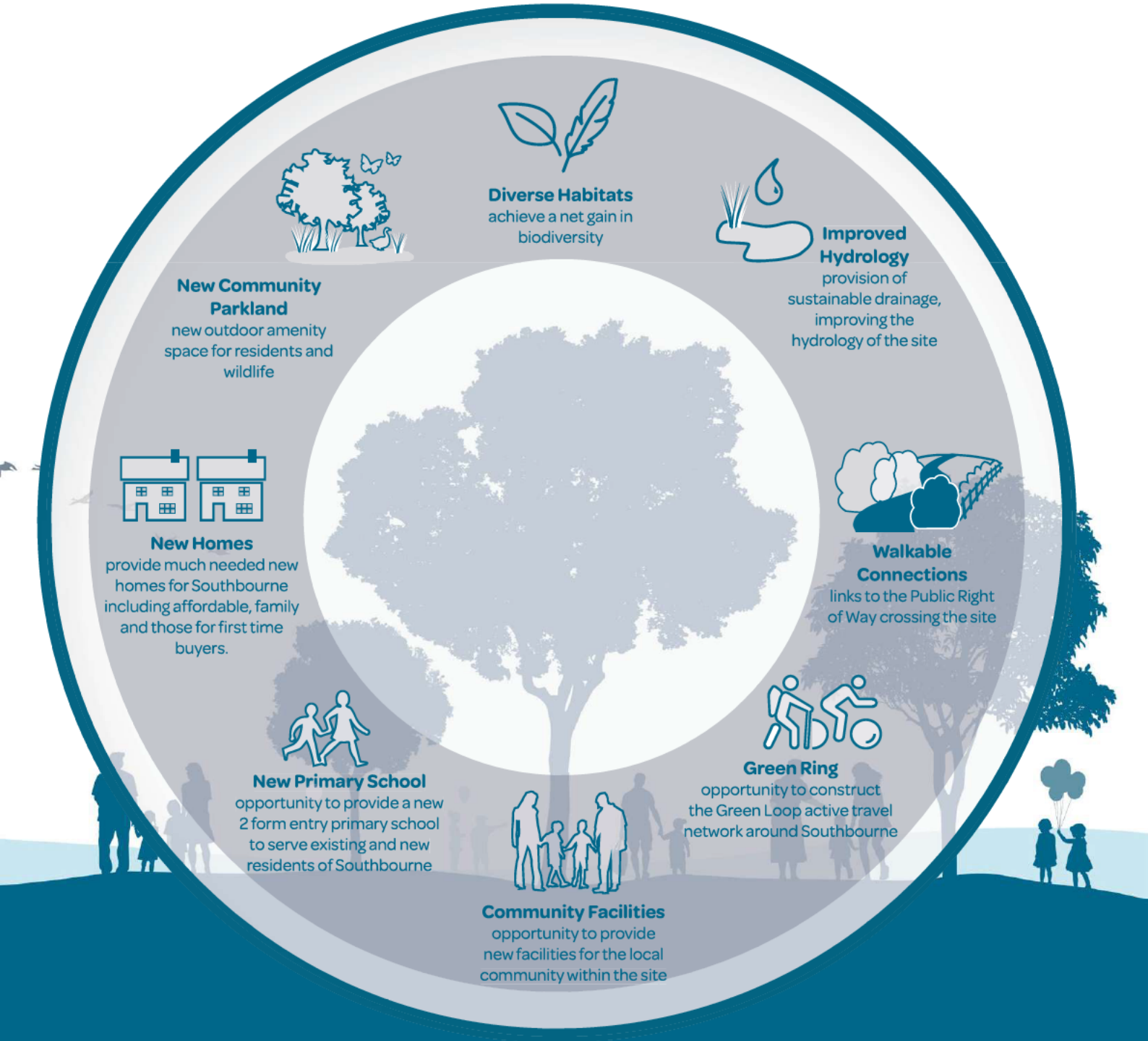
Connected habitats



The open space creates a strong landscape edge to Southbourne, protecting it for the future and creating a green open asset for the village. Within this open space are opportunities for informal recreation, wildlife corridors and enhancements to achieve a bio-diversity net gain.

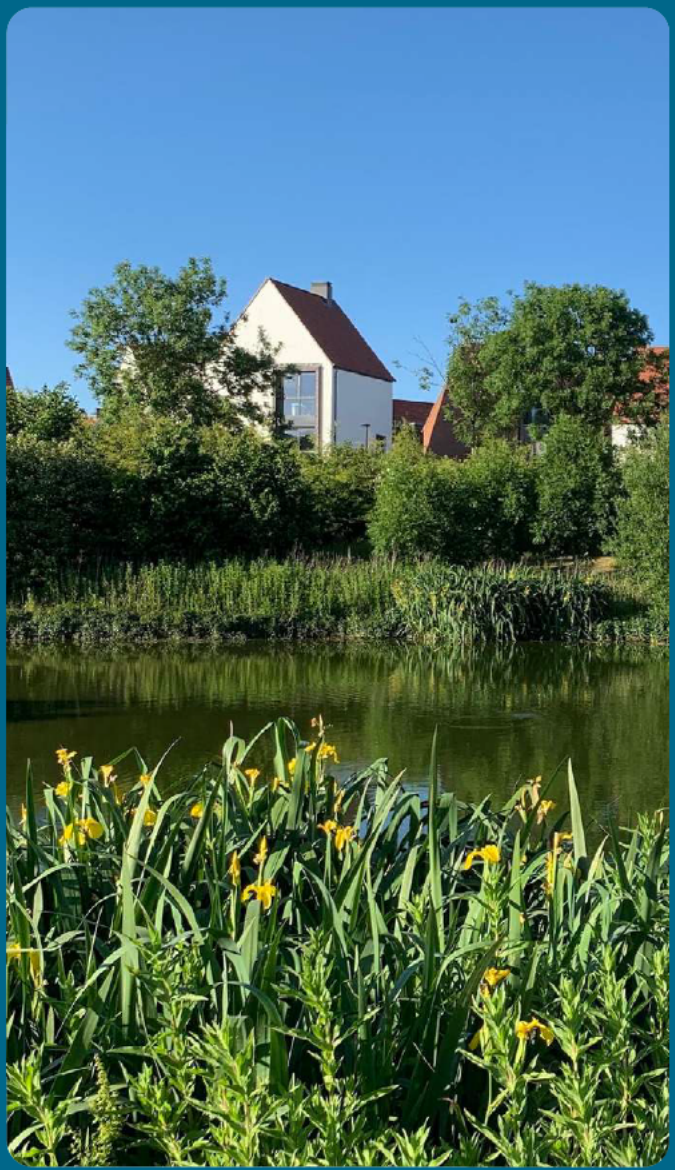


Key Benefits













Turley

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