Chichester Local Plan

Southbourne Allocation Development Plan Document

Regulation 18 Consultation Document

Representations on behalf of Metis Homes Ltd

Metis Homes Ltd

LAN001

December 2024

www.novaplanning.co.uk

Building A, Unit 3, The Yard, Station Road, Wickham, PO17 5JA

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1. Introduction

1.1 These written representations have been prepared by Nova Planning Limited (Nova) on behalf of Metis Homes Limited (Metis) in response to the Chichester District Council (CDC) Draft Southbourne Allocation Development Plan Document (DPD) for Regulation 18 Consultation. The comments set out in this document relate to this publication of the DPD and supporting consultation documents, including the Interim Sustainability Appraisal (SA) (AECOM) and Stage 1 Viability Assessment (Dixon Searle). Our representations are supported by evidence from Paul Basham Associates and Sturt & Co.

1.2 Metis has submitted an outline planning application for the development of 49 new dwellings on Land East of Inlands Road (the Site). The application (reference 24/01161/OUT), which was made valid on 17 June 2024, is yet to be determined. The Site falls within the eastern side of Southbourne, directly adjacent to the settlement boundary. To the west of Inlands Road and immediately opposite the Site is the recently constructed Priors Orchard development comprising 157 homes. The Site is adjoined to the east by the Harris Scrapyard and Oaks Farm development comprising 103 homes, which is due to commence within the next 6 months. The railway line runs east-west along the northern Site boundary, separating it from the wider Southbourne Broad Location for Development to the north. Inlands Road connects with the A259 250m south of the proposed Site access. The masterplan is shown at Figure 1 below.



Figure 1: Masterplan

2. Vision and Objectives

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

Southbourne Allocation DPD Vision

2.1 Metis is generally supportive of the Vision for Southbourne. However, as discussed at the Local Plan Examination Hearings (October 2024), the use of the word "comprehensive" should not prevent development from coming forward in stages; reflecting different land ownerships and the delivery of smaller scale sites to maintain ongoing housing land supply. It is suggested that "comprehensive" is replaced with "coordinated" as this does not prevent sites from coming forward independently of each other but will still ensure that each phase helps meet the overall Vision.

Southbourne Allocation DPD Objectives

2.2 Metis is supportive of the Objectives, particularly the focus on active travel and enabling public transport improvements to ensure climate reliance and positive contributions towards achieving net zero lifestyles. This is consistent with paragraph 11a of the National Planning Policy Framework (NPPF) which states that,

> *"all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"*

2.3 Objectives 3 and 4 are also consistent with paragraphs 108 (c and d) and 109 of the NPPF which promote sustainable transport:

> *108 "Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
>
> *c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
>
> *d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains;*
>
> *109 "The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.*

2.4 We also support the objective which promotes housing for all and the need to ensure a range of housing and tenure types. Affordable housing delivery is particularly important in this respect given challenging affordability issues in the district.

2.5 Whilst Metis support the Vision and Objectives, when considering how best to achieve these Objectives and having regard to the characteristics of Southbourne as a settlement, we believe that the suggested Scenarios (1-3) are fundamentally flawed. The starting position should be to maximise the development potential south of the railway line, and only then consider where to place the residual development north of the railway line. Alongside this, there should be a focus on providing pedestrian and cycle connections to link development north and south of the railway line rather than new vehicular routes. This would ensure that consistency with paragraphs 11a, 108c and d and 109 of the NPPF are filtered down from the Vision and Objectives to the policies which will deliver development. This approach is also consistent with the the Council's transport strategy for the emerging Local Plan Review 2021-2039 where Policy T1 acknowledges that it is neither viable nor practical to increase junction capacity on the A27 to accommodate the planned level of growth. Therefore, the transport strategy is instead based on adopting targeted measures to reduce vehicular traffic generation on the A27. This is referred to as a 'Monitor and Manage' approach, whereby modal shift is promoted through sustainable and active travel improvements. These measures will be exhausted before considering measures to increase junction capacity and operational improvements for vehicular traffic. This view is outlined in the accompanying report from Paul Basham Associates (PBA) at Appendix A.

2.6 As proposed, two of the Scenarios rely on a new vehicular bridge over the railway line. It is immediately apparent that the construction of a vehicular bridge does not support either the Vision or the broad Objectives. In fact, the construction of a vehicular bridge directly conflicts with many of these Objectives and Policy T1 of the emerging Local Plan Review, encouraging short distance vehicle trips and undermining options for sustainable travel. In addition, given the marginal viability position, the cost of a new multi-modal bridge will divert financial resources way from affordable housing, compromising the delivery of Objective 2 - housing for all.

Proposed Amendments

2.7 These representations provide two alternative Scenarios to those presented in the DPD (identified as Scenarios 4 and 5). These maximise the development potential south of the railway line and close to existing services and facilities, reducing the amount of development required north of the railway line and alleviating peak time congestion issues. This will allow the existing crossings to operate safely and efficiently for the planned level of development without the need for a multi-modal bridge and reduce the viability issues identified in the consultation document. Further detail regarding these Scenarios is provided in response to the consultation questions below. However, for clarity, the way in which these suggested Scenarios respond better to the Vision and Objectives, is summarised here:

Integrated and well serviced community

2.8 The available land south of the railway line in Scenario 1 and 2 is already well served by existing facilities and amenities, including access to high frequency rail and bus services and a strategic cycle route. Maximising development opportunities to the south of the railway line will ensure that development can be delivered in a sustainable manner in the shorter term. This will ensure that the existing facilities and amenities, concentrated south of the railway line on then A259 corridor, are supported alongside a new local centre to the north of the railway line providing complementary services. Proposed Scenarios 4 and 5 shows the provision of pedestrian and cycle connections, where land has already been safeguarded for this purpose. This would ensure that the community (north and south of the railway line) is well connected to existing and new facilities. It would also provide a more positive approach to placemaking.

Housing for all

2.9 By focusing on the provision of complementary services and amenities (limiting duplication) and the provision of pedestrian and cycle connections (avoiding the cost of a multi-modal bridge) the viability of development will be improved to ensure no unnecessary reduction in affordable housing delivery.

Transport and sustainable travel

2.10 The Council's transport strategy for the Local Plan (Policy T1) is based on adopting measures which seek to reduce traffic generation on the A27 (Monitor and Manage). In this respect, provision of infrastructure that encourages vehicle use should be the last resort having exhausted all other sustainable transport measures. In this case the Council's evidence (Stantec, March 2023) confirms that a vehicular bridge is not required without other mitigation in place and our analysis (PBA, December 2024) further emphasises this. Setting aside the implications on viability, to include a multi-modal bridge in two of the Scenarios is entirely unjustified and completely undermines the overall transport strategy. The provision of a multi-modal bridge is based on estimates of traffic generation from additional development north of the railway line. Even with the Scenarios as presented, (including Scenario 3 with 800 dwellings north of railway line), there is no highway capacity justification for a bridge. By maximising development potential south of the railway line, the level of development north of the railway line can be limited to 600 dwellings. This is significantly below the threshold in the Council's evidence (Stantec, March 2023), which overestimates the traffic impacts of planned development on crossings based on our more recent analysis (PBA, December 2024).

2.11 To reduce vehicular traffic in line with the Local Plan transport strategy (Policy T1), the allocation should focus on pedestrian and cycle connections and connectivity to existing public transport services. Land has been safeguarded for the provision of pedestrian and cycle bridges on both sides of the settlement, where one of these connections can be provided as part of an allocation. Provision of a pedestrian and cycle connection over the railway line would provide genuine opportunities for walking and cycling, and in doing so promote sustainable travel choices in line with Policy T1 and the NPPF. It would also encourage existing residents to access existing and proposed facilities and services in Southbourne by walking and cycling.

2.12 The provision of the CHEMROUTE, in combination with contributions from other planned development on the East-West Corridor, would provide onward cycle connectivity to Chichester and Emsworth, to further align with the Local Plan transport strategy (Policy T1) and have the additional benefit of providing sustainable travel choices to the significant existing population that live along this corridor. This would materially reduce traffic generation on the A27 and the two priority junctions at Warblington and Fishbourne.

Climate change and moving towards net zero carbon living

2.13 Meeting the policy requirements of the emerging local plan, the NPPF and current building regulations will contribute towards achieving carbon reduction and mitigating the impact of development on climate change. These measures could include but are not limited to:

- A 'fabric first' approach to ensure buildings are constructed with sustainably-sourced materials and delivering good energy performance
- Electric vehicle charging points for residents and visitors
- Measures to achieve reductions in energy and water consumption
- Green roofs on garaging to provide opportunities for biodiversity enhancement and reduction of surface water run-off from the development.
- Biodiversity Net Gain to ensure that the natural environment is left in a measurably better condition following development.

2.14 Locating development where it can benefit from existing facilities and services, and public transport opportunities, should be the starting point. Maximising development opportunities to the south of the railway line should be the focus for all Scenarios. Where new development needs to be provided to the north of the railway line, it would be logical to focus on one side of the settlement where new facilities can be concentrated, and a single pedestrian and cycle bridge can provide a connection.

2.15 One of the most significant environmental impacts from the planned development will be emissions from the vehicular traffic associated with the development during its operational stage. In this respect, it is critical that opportunities to reduce vehicular traffic are taken. As noted above, this would also align with the Local Plan transport strategy (Policy T1). The provision of an unjustified and unviable vehicular bridge would be completely at odds with this objective. Alternatively, the provision a pedestrian and cycle bridge on safeguarded land together with delivery of the CHEMROUTE would ensure that vehicular traffic and associated emissions are minimised in respect of planned development and reduced in respect of the existing population.

Environment

2.16 Maximising development potential south of the railway line would not undermine the stated Objectives. The land to the east of the settlement and south of the railway line is completely unconstrained when considering the stated environmental Objectives and could provide circa 100 - 125 dwellings using an average density of 20-25dph The land to the west of the settlement and south of the railway line provides

secondary Brent Geese habitat, but this can be mitigated alongside circa 100 – 125 dwellings using the same average density range.

Character

2.17 The existing undeveloped land between the A259 and the railway line is largely contained in the wider landscape where residential development at a scale of 2/3 storeys will not have a significant impact on the landscape (including the AONB to the south). This has been endorsed in various recent appeal decisions. Therefore, maximising development opportunities to the south of the railway line has the benefit of reducing the amount of development to the north of the railway line where the character is more rural, open and sensitive to landscape change – noting also that the openness of the landscape in northern portion of the BLD is likely to feature in long distance views from the South Downs National Park.

2.18 In conclusion, the proposed Scenarios (1-3) do not promote a sustainable pattern of development in accordance with the stated Vision and Objectives. For the same reasons, these Scenarios are in conflict with the overarching sustainability principles of the NPPF. The proposals, which rely on car led Scenarios, are in particular conflict with paragraph 11a of the Framework which among other things, seek to,

"improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects".

2.19 This means there is also a conflict with paragraph 16a which states that,

"Plans should a) be prepared with the objective of contributing to the achievement of sustainable development"

2.20 The alternative Scenarios (4 and 5) promoted by Metis overcome these conflicts by promoting sustainable travel (walking and cycling), whilst also locating development close to the existing bus services on the A259 and close to the railway station. In turn, this will have a positive effect on improving the environment, mitigating climate change (including by making effective use of land in more contained urban areas) and adapting to its effects (paragraph 11a). Therefore, the suggested Scenarios 4 and 5 constitute sustainable development in accordance with paragraph 16a of the Framework. It is in this context that the responses to the consultation questions are framed. We do not consider that Scenarios 1- 3 meet the tests of soundness as set out at paragraph 35 of the NPPF. In particular, the proposals are not considered justified (b) or consistent with national policy (d).

2.21 Paragraph 35b of the NPPF requires that plans are **justified**, providing,

"an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence".

2.22 Metis have provided two alternative Scenarios is Section 6 of these representations. As demonstrated, these provide an effective and justified strategy for the delivery of development in accordance with Policy

A13 of the emerging Local Plan Review: providing credible alternatives to a car led Scenario. Analysis of the Council's own evidence (transport and viability) demonstrates that there is no justification for a multi-modal bridge. The starting point when considering alternatives should have been Scenarios which do not promote the bridge – as presented in Scenarios 4 and 5 below.

2.23 Paragraph 35d of the NPPF requires that plans are **consistent with national policy**,

"enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant'.

2.24 For the reasons set out above (paragraphs 2.18 – 2.19), it is not considered that the proposed Scenarios will deliver sustainable development in accordance with other policies of the Framework. Consequently, it is not considered that any of the Scenarios presented in the DPD would meet the tests of soundness as set out in the NPPF.

3. Scenario 1: Land to the West

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

Benefits

3.1 Metis agree that a new primary school and local centre will help create a new community hub with associated social, economic and environmental benefits. The provision of improved pedestrian and cycle connections (paragraph 5.12) will add to these benefits alongside additional health and well-being benefits.

3.2 We do not agree that the existing pedestrian rail crossing is unsafe. There is no evidence to support this. If Network Rail believe there is a safety issue, the evidence and justification should be made publicly available. However, we do acknowledge that land is already safeguarded for a pedestrian and cycle bridge, which provides a benefit in terms of deliverability (paragraph 5.13).

3.3 It is also agreed that the single land ownership of land to the north of the railway line is a benefit in terms of deliverability (paragraph 5.15). However, as set out elsewhere in these representations, a focus on land to the north of the railway results in a more unsustainable pattern of growth than the available alternatives, and as such it is not justified. Maximising development opportunities on available land to the south of the railway line would result in a more sustainable pattern of growth, and be better aligned with the Objectives cited in the Vision. Whilst land to the south of the railway line is in multiple ownership, this land is deliverable and developable (as evidenced by recent planning applications and HELAA submissions) and this would not prevent sites from coming forward in the most sustainable part of the BLD area.

Challenges

3.4 Challenges surrounding the need for and the delivery of a multi-modal bridge are noted, and it is agreed that these present a significant challenge in terms of viability, deliverability and implementation (paragraph 5.18). However, based on the evidence available, including the Council's own evidence, we do not agree that access is dependent on two new vehicular accesses (north and south) together with a vehicular bridge. The delivery of a vehicular bridge should not be identified as a challenge as it is not required.

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

Challenges

3.5 Any Scenario which relies on a new vehicular bridge presents a significant challenge. Metis do not consider that the bridge is justified in transport terms or supports good placemaking – it undermines the Vision, the Objectives and the Local Plan transport strategy. Conversely, a pedestrian and cycle bridge

supports all of these. The allocation should not be designed for a car led Scenario. In response to improving connectivity, the first solution should not be to build a vehicular bridge. Instead, it should be to encourage non-car journeys by providing Infrastructure that facilitates non-car journeys and makes non-car journeys convenient, attractive and safe.

3.6 It is also considered that clarification on the distribution of development is required. Even with only 100 dwellings to south of the railway line, it leaves only 700 to north, which is well within capacity given that the Council's evidence states that, "between 750 – 1000 dwellings, a road bridge may be beneficial". Our estimation is that a minimum of 200 dwellings could be constructed to the south of the railway line which would leave a residual requirement of 600 to be provided north of the railway line, making a vehicular bridge completely unnecessary. Again, this points to the need to maximise development to the south first, reducing the residual requirement to the north.

3.7 An Assessment has been prepared by Paul Basham Associates (PBA) and can be found at Appendix A of these representations. This reviews the Council's transport evidence prepared by Stantec, which considers the need for a multi-modal bridge. The Assessment concludes that there is no justification for a multi modal bridge to deliver the residual requirement of 800 dwellings. By maximising development to the south of the railway (a minimum of 200 dwellings), the case for a vehicular bridge is diminished further, as there is no evidence to suggest that a bridge is required for 600 dwellings north of the railway.

3.8 A further challenge with this Scenario is that the inclusion of a vehicular bridge significantly undermines viability, and therefore compromises the viability/deliverability of affordable housing, the local centre and other community infrastructure which are key elements of the Vision. Maximising development opportunities to the south of the railway line, where existing services and facilities are located, would support these existing services and allow the new Local Centre to focus on complementary provision. This would assist with the overall viability and deliverability of development, also ensuring that affordable housing delivery is not undermined.

3.9 An analysis of the Council's Stage 1 Viability Assessment (Dixon Searle) has been carried out by Sturt and Co. A copy of this analysis can be found at Appendix B of these representations.

3.10 The analysis highlights a significant inconsistency in that the Dixon Searle reporting includes appraisals of development Scenarios of 1,050 dwellings, whereas the consultation is being undertaken on the basis of identifying an allocation for 800 dwellings (the residual requirement net of committed development), Sturt & Co question the relevance and legitimacy of Dixon Searle assessing the viability of 1,050 dwellings, noting that the obligations for the 250 committed dwellings are already secured through their respective permissions, and should not be included in viability modelling for 1,050 dwellings Scenarios, as appears to be the case in the Dixon Searle reporting.

3.11 Sturt & Co also highlight that requests were made to CDC for electronic copies of the Argus Appraisal worksheets for the appraisals at Appendix 2a of the Dixon Searle Assessment, but this information has not been provided on the basis that it is information that would need to be made available to all parties,

which is not considered appropriate while the consultation process is underway. Consequently, it was not possible for Sturt & Co to undertake a full and detailed assessment.

3.12 However, the analysis has highlighted a number of significant issues relating to assumptions made by Dixon Searle in respect of Sales Values, Benchmark Land Value and Finance Rates – which have a significant impact on viability, both individually and cumulatively.

3.13 The analysis concludes that the viability position is challenging based on the issues outlined above. However, the inclusion of bridge infrastructure costs is the most concerning given the significance of these costs and the lack of any supporting cost analysis. Based on their analysis, there are strong indications that these costs have been significantly underestimated and as such the marginal viability position being reported is incorrect. Sturt & Co confirm that the viability of development is significantly compromised with a multi-modal bridge. Development is more likely to be viable with a pedestrian/cycle bridge.

3.14 In summary, by not directing development to where services already exist along the A259 corridor, the benefits are not being maximised in this Scenario. The A259 corridor provides a sustainable and viable location for development, which reduces the costs associated with development of north of the railway. This avoids putting unnecessary and avoidable pressure on viability, and in turn affordable housing, it supports the wider Vision, Objectives and Local Plan strategy, it responds in a positive way to environmental challenges including landscape character and supports measures to address climate change.

3.15 The challenges with Scenario 1 are exacerbated by not maximising development on land to the south of railway. These challenges would be avoided or significantly mitigated by proposed Scenarios 4 and 5 as shown in Section 6 of these representations.

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?

3.16 Metis do not consider this to be a challenge, but instead it presents an opportunity to encourage more non-vehicle journeys. The provision of a pedestrian and cycle bridge, providing a sustainable connection between development north and south of the railway line, and linking existing facilities to a new community hub centered around the existing secondary school, would result in a well-connected and sustainable community. It would provide genuine and convenient opportunities to walk or cycle, achieving the modal shift which the Monitor and Manage approach relies upon. Conversely, a vehicular bridge will encourage short car journeys, leading to further congestion and undermining measures designed to tackle climate change. A vehicular bridge would not be a benefit but a significant challenge to the delivery of the Local Plan strategy and DPD Vision and Objectives.

4. Scenario 2: Land to the East

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

Benefits

4.1 Metis do not agree that the delivery of a new vehicular bridge which would connect the A259 to Priors Leaze Lane through various parcels of land east of Inlands Road, is a benefit (paragraph 5.24). There is no justification for the bridge (see paragraphs 3.7 – 3.9 above and Appendices A and B). It will encourage reliance on vehicle trips, undermine the viability of the allocation and by extension compromise the delivery of affordable housing and community infrastructure.

4.2 The Scenario would result in the proposed Primary School and local centre being located a significant distance from the existing Secondary School and Bourne Leisure Centre, with poor pedestrian and cycle infrastructure provided on the existing network north of the railway line between these locations. This dispersal of facilities without suitable pedestrian and cycle connections will encourage car journeys across the village. This is incorrectly presented as a benefit (paragraph 5.26) on the basis of distributing car journeys, when car journeys should be discouraged as a first principle. Any Scenario which encourages car journeys is at odds with the Local Plan strategy, the BLD Vision and Objectives and the NPPF.

Challenges

4.3 Metis do not agree that "this Scenario has a strong reliance on a vehicular bridge over the railway" (paragraph 5.29) as there is no evidence to demonstrate that a vehicular bridge is required to deliver this Scenario, where at least 200 of the 800 dwellings can be located to the south of the railway line. Paragraph 5.29 goes on to state that the vehicular bridge is challenged by Metis' planning application (Ref. 24/01161) for 49 dwellings on land to the east of Inlands Road. The delivery of a road bridge should not be seen as a challenge as it is not required. Notwithstanding the lack of evidence supporting the need for a vehicular bridge, Metis agree with the final statement at paragraph 5.29 which notes that the cost and delivery timeframe for a vehicular bridge is a challenge. It is a significant challenge that would undermine the viability of the allocation and this is confirmed in the supporting evidence from Sturt & Co at Appendix B.

4.4 Metis do not agree that "If a pedestrian, cycle or multi-modal bridge cannot be delivered as part of this Scenario then it will raise concerns about additional traffic (pedestrian, cyclist and vehicular) from new development on the Inlands Road level crossing which has been raised as a concern by Network Rail" (paragraph 5.30). Firstly, the three modes of transport are being linked. There is no capacity or safety justification for a vehicular bridge on the basis of the planned level of development. Setting this aside, there are also considerable viability and deliverability challenges associated with its delivery. Provision of a pedestrian and cycle bridge is not constrained in the same way. Land is already safeguarded for a

pedestrian and cycle bridge, and it does not present the same viability challenges as a vehicular bridge in terms of cost. The provision of a pedestrian and cycle bridge would provide a sustainable connection between land north and south of the railway line, removing the need to travel by car. This would result in significant for air quality, sustainable travel, climate change and health benefits.

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

4.5 As this Scenario relies on a vehicular bridge, the additional benefits and challenges are the same as Scenario 1, repeated here for completeness.

Challenges

4.6 Any Scenario which relies on a new vehicular bridge presents a significant challenge. Metis do not consider that the bridge is justified in transport terms or supports good placemaking – it undermines the Vision, the Objectives and the Local Plan transport strategy. Conversely, a pedestrian and cycle bridge supports all of these. The allocation should not be designed for a car led Scenario. In response to improving connectivity, the first solution should not be to build a vehicular bridge. Instead, it should be to encourage non-car journeys by providing Infrastructure that facilitates non-car journeys and makes non-car journeys convenient, attractive and safe.

4.7 It is also considered that clarification on the distribution of development is required. Even with only 100 dwellings to south of the railway line, it leaves only 700 to north, which is well within capacity given that the Council's evidence states that, "between 750 – 1000 dwellings, a road bridge may be beneficial". Our estimation is that a minimum of 200 dwellings could be constructed to the south of the railway line which would leave a residual requirement of 600 to be provided north of the railway line, making a vehicular bridge completely unnecessary. Again, this points to the need to maximise development to the south first, reducing the residual requirement to the north.

4.8 An Assessment has been prepared by Paul Basham Associates (PBA) and can be found at Appendix A of these representations. This assesses the Council's transport evidence prepared by Stantec, which considers the need for a multi-modal bridge. The Assessment concludes that there is no justification for a multi modal bridge to deliver the residual requirement of 800 dwellings. By maximising development to the south of the railway (a minimum of 200 dwellings), the case for a vehicular bridge is diminished further, as there is no evidence to suggest that a bridge is required for 600 dwellings north of the railway..

4.9 A further challenge with this Scenario is that the inclusion of a vehicular bridge significantly undermines viability, and therefore compromises the viability/deliverability of affordable housing, the local centre and other community infrastructure which are key elements of the Vision. Maximising development opportunities to the south of the railway line, where existing services and facilities are located, would support these existing services and allow the new Local Centre to focus on complementary provision. This would assist with the overall viability and deliverability of development, also ensuring that affordable housing delivery is not undermined.

4.10 An analysis of the Council's Stage 1 Viability Assessment (Dixon Searle) has been carried out by Sturt and Co. A copy of this analysis can be found at Appendix B of these representations.

4.11 The analysis highlights a significant inconsistency in that the Dixon Searle reporting includes appraisals of development Scenarios of 1,050 dwellings, whereas the consultation is being undertaken on the basis of identifying an allocation for 800 dwellings (the residual requirement net of committed development), Sturt & Co question the relevance and legitimacy of Dixon Searle assessing the viability of 1,050 dwellings, noting that the obligations for the 250 committed dwellings are already secured through their respective permissions, and should not be included in viability modelling for 1,050 dwellings Scenarios, as appears to be the case in the Dixon Searle reporting.

4.12 Sturt & Co also highlight that requests were made to CDC for electronic copies of the Argus Appraisal worksheets for the appraisals at Appendix 2a of the Dixon Searle Assessment, but this information has not been provided on the basis that it is information that would need to be made available to all parties, which is not considered appropriate while the consultation process is underway. Consequently, it was not possible for Sturt & Co to undertake a full and detailed assessment.

4.13 However, the analysis has highlighted a number of significant issues relating to assumptions made by Dixon Searle in respect of Sales Values, Benchmark Land Value and Finance Rates – which have a significant impact on viability, both individually and cumulatively.

4.14 The analysis concludes that the viability position is challenging based on the issues outlined above. However, the inclusion of bridge infrastructure costs is the most concerning given the significance of these costs and the lack of any supporting cost analysis. Based on their analysis, there are strong indications that these costs have been significantly underestimated and as such the marginal viability position being reported is incorrect. Sturt & Co confirm that the viability of development is significantly compromised with a multi-modal bridge. Development is more likely to be viable with a pedestrian/cycle bridge.

4.15 In summary, by not directing development to where services already exist along the A259 corridor, the benefits are not being maximised in this Scenario. The A259 corridor provides a sustainable and viable location for development, which reduces the costs associated with development of north of the railway. This avoids putting unnecessary and avoidable pressure on viability, and in turn affordable housing, it supports the wider Vision, Objectives and Local Plan strategy, it responds in a positive way to environmental challenges including landscape character and supports measures to address climate change.

4.16 The challenges with Scenario 1 are exacerbated by not maximising development on land to the south of railway. These challenges would be avoided or significantly mitigated by proposed Scenarios 4 and 5 as shown in Section 6 of these representations.

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

4.17 As with Scenario 1, Metis do not consider this to be a challenge, but instead it presents an opportunity to encourage more non-vehicle journeys. The provision of a pedestrian and cycle bridge, providing a sustainable connection between development north and south of the railway line, and linking existing facilities to a new community hub centered around the existing secondary school, would result in a well-connected and sustainable community. It would provide genuine and convenient opportunities to walk or cycle, achieving the modal shift which the Monitor and Manage approach relies upon. Conversely, a vehicular bridge will encourage short car journeys, leading to further congestion and undermining measures designed to tackle climate change. A vehicular bridge would not be a benefit but a significant challenge to the delivery of the Local Plan strategy and DPD Vision and Objectives.

5. Scenario 3: Mixed Scenario

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

Benefits

5.1 Metis agree that this Scenario minimises risks regarding viability and deliverability as it does not propose a multi modal bridge (paragraph 5.36). For the reasons set out previously, the requirement for a multi modal bridge has not been evidenced in highway terms and will undermine viability, compromising the delivery of affordable housing and community infrastructure.

5.2 Metis disagree that the dispersal of educational facilities across the village is a benefit (paragraph 5.38). This Scenario would result in the proposed Primary School and local centre being located a significant distance from the existing Secondary School and Bourne Leisure Centre, with poor pedestrian and cycle infrastructure provided on the existing network north of the railway line between these locations. This dispersal of facilities without suitable pedestrian and cycle connections will encourage car journeys across the village. Sustainable patterns should be promoted, and car journeys should be discouraged as a first principle. Any Scenario which encourages car journeys is at odds with the Local Plan strategy and the BLD Vision and Objectives. It is also in conflict with Paragraphs 108 and 109 of the NPPF,

5.3 We agree that a pedestrian/cycle bridge using safeguarded land is a benefit (paragraph 5.39). However, the potential to deliver a pedestrian/cycle bridge on the eastern side should be added to list of benefits.

Challenges

5.4 This approach places the entirety of the 800 dwellings requirement to the north of the railway line, which results in the greatest impact on the existing crossings. The accompanying PBA Assessment at Appendix A confirms that the existing crossings can conceivably accommodate 800 dwellings to north of the railway line. However, the potential to mitigate the impacts on crossings – through internalisation of trips and Travel Plan measures encouraging modal shift - are significantly more challenging for this dispersed Scenario.

5.5 It is not considered that the concerns regarding the railway crossings have been substantiated by evidence and rely on comments from Network Rail (paragraph 5.43).

5.6 An analysis of the Council's Stage 1 Viability Assessment (Dixon Searle) has been carried out by Sturt & Co. A copy of this analysis can be found at Appendix B of these representations.

5.7 The analysis highlights a significant inconsistency in that the Dixon Searle reporting includes appraisals of development Scenarios of 1,050 dwellings, whereas the consultation is being undertaken on the basis of identifying an allocation for 800 dwellings (the residual requirement net of committed development), Sturt & Co question the relevance and legitimacy of Dixon Searle assessing the viability of 1,050

dwellings, noting that the obligations for the 250 committed dwellings are already secured through their respective permissions, and should not be included in viability modelling for 1,050 dwellings Scenarios, as appears to be the case in the Dixon Searle reporting.

5.8 Sturt & Co also highlight that requests were made to CDC for electronic copies of the Argus Appraisal worksheets for the appraisals at Appendix 2a of the Dixon Searle Assessment, but this information has not been provided on the basis that it is information that would need to be made available to all parties, which is not considered appropriate while the consultation process is underway. Consequently, it was not possible for Sturt & Co to undertake a full and detailed assessment.

5.9 However, the analysis has highlighted a number of significant issues relating to assumptions made by Dixon Searle in respect of Sales Values, Benchmark Land Value and Finance Rates – which have a significant impact on viability, both individually and cumulatively.

5.10 The analysis concludes that the viability position is challenging based on the issues outlined above. However, the inclusion of bridge infrastructure costs is the most concerning given the significance of these costs and the lack of any supporting cost analysis. Based on their analysis, there are strong indications that these costs have been significantly underestimated and as such the marginal viability position being reported is incorrect. Sturt & Co confirm that the viability of development is significantly compromised with a multi-modal bridge. Development is more likely to be viable with a pedestrian/cycle bridge. The absence of a vehicular bridge In this Scenario makes the viability position more favourable than Scenarios 1 and 2. However, the provision of two pedestrian and cycle bridges, based on a dispersed approach to development introduces an unnecessary burden on the viability of the allocation.

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

Benefits

5.11 The opportunity to create village-wide convenient, safe and enjoyable linked routes for pedestrians and cyclists as part of a wider Green Infrastructure (GI) network, should be seen as a significant benefit.

Challenges

5.12 Scenario 3 locates all new development to the north of the railway line, omitting all land to the south. This is non-sensical and unsustainable. Existing facilities and services are located to the south of the village along the A259 corridor. New development to the south would help support these local businesses, which can be reached by pedestrians and cyclists as well as being located close to bus stops and the train station. For all three Scenarios, the viability of development is already marginal and given this marginal position, planned spending on community infrastructure and the creation of a new local centre should focus on complementary services rather than duplicating existing services. This should be served by a single pedestrian and cycle bridge.

5.13 In this Scenario, the lack of a multi-modal bridge is justified due to the dispersal of development to the east and west of Southbourne (paragraph 5.43). However, Scenario 3 locates all of the new development north of the railway line. The Stantec Assessment (March 2023) states that it is only development north of the railway line which impacts on the capacity of the crossings. It states that a bridge "may be beneficial" (not required) for development Scenarios of 750 – 1,000 dwellings. Whilst the PBA Assessment at Appendix A confirms that the impact on crossings is significantly less than that presented by Stantec when the benefits of modal shift and internalisation are applied to the analysis, it is nonetheless difficult to understand the Council's rationale for this Scenario, i.e. how a vehicular bridge is deemed necessary for Scenarios 1 and 2 which locates less than 800 dwellings north of the railway line, but not be necessary for Scenario 3 which locates all 800 dwellings to the north.

6. Preferred Scenarios

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).

6.1 Metis do not support these three Scenarios. Instead, we propose two alternative Scenarios:

- Scenario 4: South of the Railway (east and west) and North of the Railway (west)
- Scenario 5: South of the Railway (east and west) and North of the Railway (east).

6.2 To demonstrate the significant benefits of these Scenarios, we have taken the format used to present Scenarios 1, 2 and 3 and completed for Scenarios 4 and 5. These are shown below:

Scenario 4: South of the Railway (east and west) and North of the Railway (west)

6.3 This Scenario maximises development to the south of the railway line, close to existing services, facilities and public transport. It will provide a new pedestrian and cycle bridge over the railway line and is not reliant on a new multi modal bridge. It will complement existing facilities in Southbourne as well as creating a new hub around the Bourne Community College and the Bourne Leisure Centre.

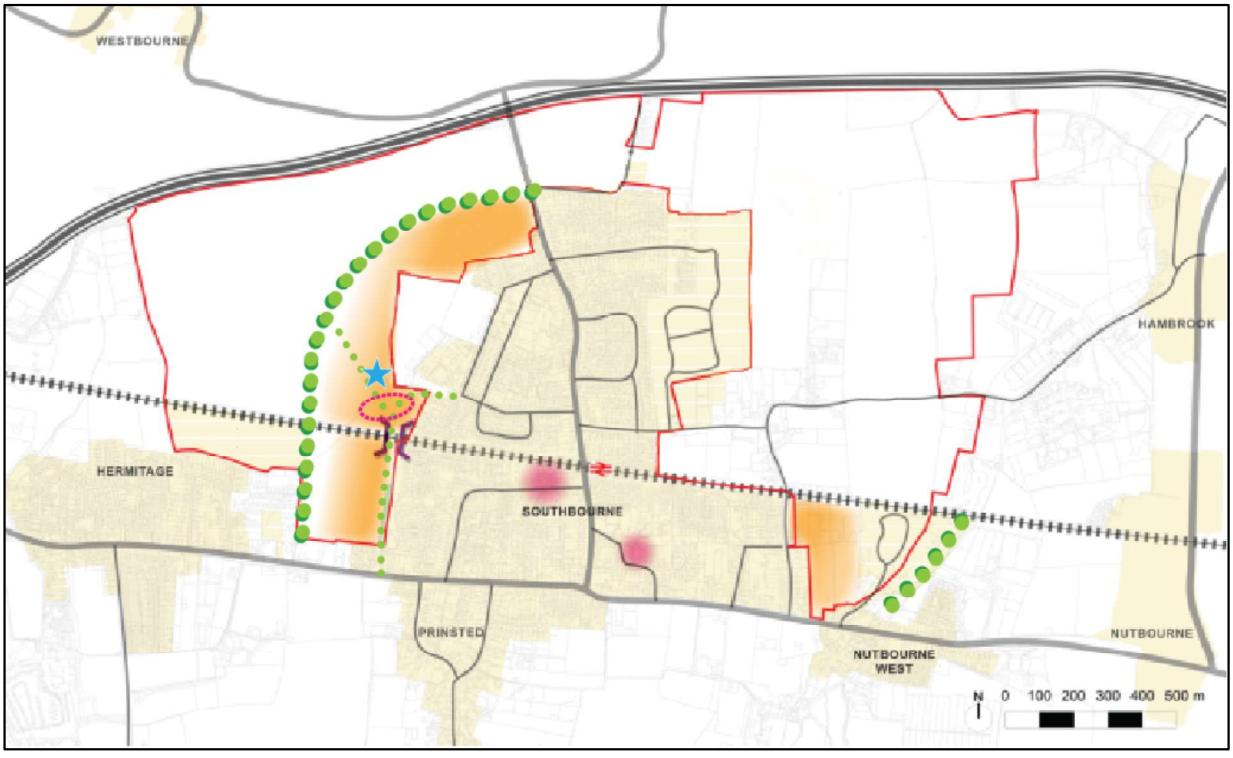

Figure 2: Scenario 4

Benefits

6.4 This Scenario minimises risks regarding access and delivery as it does not propose to build a multi-modal bridge and maximises the use of available land south of the railway line which is inherently sustainable given the presence of existing facilities, services and access to public transport (high frequency bus route and railway station) within walking and cycling distances.

6.5 This Scenario offers certainty for affordable housing and the strategy focuses on the provision of complementary community infrastructure and removes the significant viability/deliverability issues associated with the provision of a vehicular bridge.

6.6 A new pedestrian and cycle bridge will provide sustainable connections north-south, using land safeguarded through Section 106 Agreements from existing developments south of the railway line.

6.7 This Scenario would support the delivery of the CHEMROUTE in combination with contributions from other planned development on the East-West Corridor. This would provide onward cycle connectivity to Chichester and Emsworth, to further align with the Local Plan transport strategy (Policy T1) and have the additional benefit of providing sustainable travel choices to the significant existing population that live along this corridor. This would materially reduce traffic generation on the A27 and the two priority junctions at Warblington and Fishbourne.

6.8 A new two-form entry (2FE) primary school and community centre (providing complementary services and facilities) could be located adjacent to the existing Bourne Community College. This could create a hub of activity for the village where facilities can be shared between the existing college and Bourne Leisure Centre with the new Primary School and community centre, ensuring the use of facilities is maximised. This Scenario would create a safe community hub for children and the wider community and would benefit from having good connectivity to pedestrian and cycle routes within the Green Ring. There would also be multiple opportunities to create walking and cycle connections into the existing village.

6.9 This Scenario allows the delivery of a western section of the Green Ring which integrates biodiversity, nature, wildlife and TPOs (Tree Preservation Orders) with Public Rights of Way and pedestrian and cycle connectivity.

6.10 By maximising development to the south first, the need to accommodate the existing gas pipeline that runs through much of the northern part of the BLD, is reduced or negated.

Challenges

6.11 An analysis of the Council's Stage 1 Viability Assessment (Dixon Searle) has been carried out by Sturt & Co. A copy of this analysis can be found at Appendix B of these representations.

6.12 The analysis highlights a significant inconsistency in that the Dixon Searle reporting includes appraisals of development Scenarios of 1,050 dwellings, whereas the consultation is being undertaken on the basis

of identifying an allocation for 800 dwellings (the residual requirement net of committed development), Sturt & Co question the relevance and legitimacy of Dixon Searle assessing the viability of 1,050 dwellings, noting that the obligations for the 250 committed dwellings are already secured through their respective permissions, and should not be included in viability modelling for 1,050 dwellings Scenarios, as appears to be the case in the Dixon Searle reporting.

6.13 Sturt & Co also highlight that requests were made to CDC for electronic copies of the Argus Appraisal worksheets for the appraisals at Appendix 2a of the Dixon Searle Assessment, but this information has not been provided on the basis that it is information that would need to be made available to all parties, which is not considered appropriate while the consultation process is underway. Consequently, it was not possible for Sturt & Co to undertake a full and detailed assessment.

6.14 However, the analysis has highlighted a number of significant issues relating to assumptions made by Dixon Searle in respect of Sales Values, Benchmark Land Value and Finance Rates – which have a significant impact on viability, both individually and cumulatively.

6.15 The analysis concludes that the viability position is challenging based on the issues outlined above. However, the inclusion of bridge infrastructure costs is the most concerning given the significance of these costs and the lack of any supporting cost analysis. Based on their analysis, there are strong indications that these costs have been significantly underestimated and as such the marginal viability position being reported is incorrect. Sturt & Co confirm that the viability of development is significantly compromised with a multi-modal bridge. Development is more likely to be viable with a pedestrian/cycle bridge. However, the absence of a vehicular bridge In this Scenario makes the viability position more favourable than Scenarios 1 and 2.

6.16 Development in this Scenario involves an area identified as part of the gap from the Landscape Gap Assessment (CDC,2019). 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. In relation to the south of the railway this is addressed by a 100 metre landscape buffer; however more consideration and mitigation can be implemented through design.

6.17 This Scenario could impact a Brent Geese Secondary Support Area which would need to be comprehensively mitigated as set out by the Solent Wader and Brent Goose Strategy Guidance on Mitigation and Off-setting Requirements Report of 2018.

Scenario 5: South of the Railway (east and west) and North of the Railway (east)

6.18 This Scenario maximises development to the south of the railway, close to existing services, facilities and public transport. It will provide a new pedestrian and cycle bridge over the railway and is not reliant on a new multi modal bridge. It will complement existing facilities in Southbourne along the A259 corridor and provide an opportunity for a new primary school.

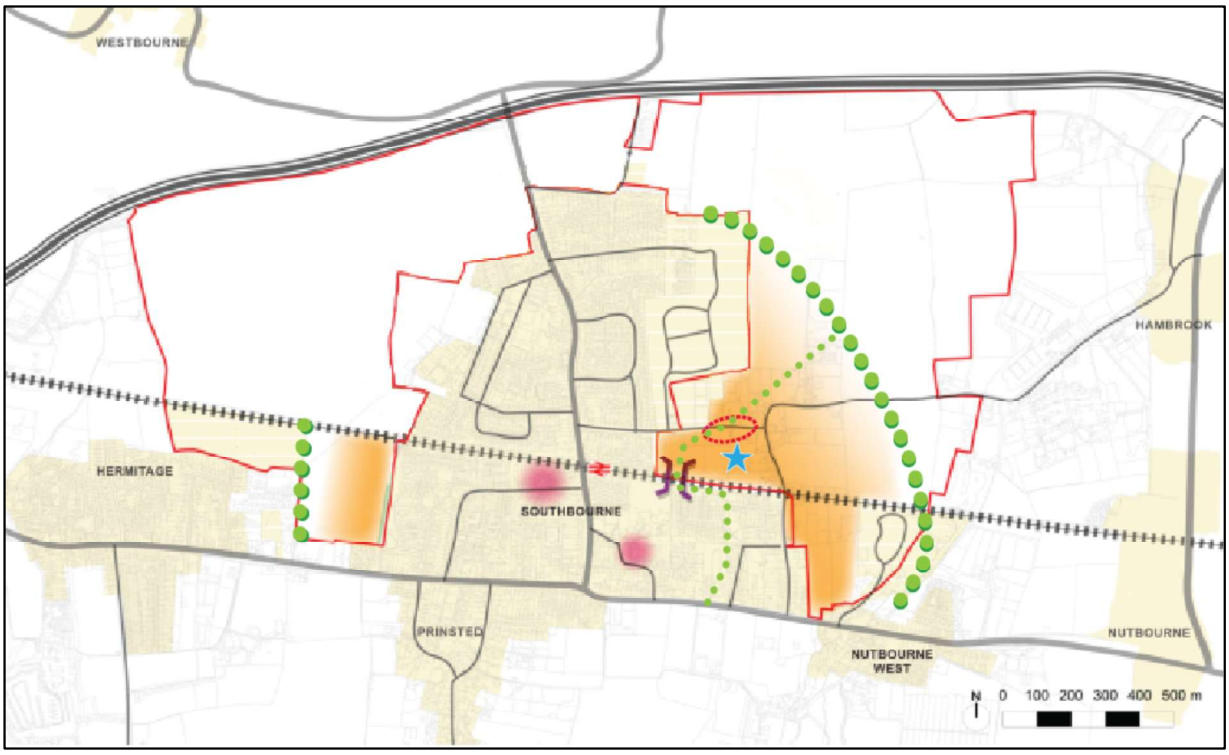

Figure 3: Scenario 5

Benefits

6.19 This Scenario minimises risks regarding access and delivery as it does not propose to build a multi-modal bridge and maximises land that is more readily accessible to the south of the railway.

6.20 This Scenario offers certainty for affordable housing and the strategy focuses on the provision of complementary community infrastructure and removes the significant viability/deliverability issues associated with the provision of a vehicular bridge.

6.21 A new pedestrian and cycle bridge will provide sustainable connections north-south, using land safeguarded through Section 106 Agreements from existing developments south of the railway line.

6.22 This Scenario would support the delivery of the CHEMROUTE in combination with contributions from other planned development on the East-West Corridor. This would provide onward cycle connectivity to Chichester and Emsworth, to further align with the Local Plan transport strategy (Policy T1) and have the

additional benefit of providing sustainable travel choices to the significant existing population that live along this corridor. This would materially reduce traffic generation on the A27 and the two priority junctions at Warblington and Fishbourne.

6.23 This Scenario allows the delivery of the eastern section of the Green Ring, incorporating locally protected hedgerows and historic orchards and local green spaces.

6.24 The proposed development 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. A landscape corridor at the eastern edge of the Scenario provides a spatial and visual gap north of the railway line. Development in the eastern Scenario does not involve land identified as part of the gap from the Landscape Gap Assessment (CDC, May 2019).

6.25 By maximising development to the south first, the need to accommodate the existing gas pipeline that runs through much of the northern part of the BLD, is reduced or negated.

Challenges

6.26 The location of the proposed new primary school to the east of the village does not consolidate facilities but will spread out the educational facilities across Southbourne, which is likely to encourage short vehicle trips between the two schools.

6.27 This Scenario includes multiple landowners and therefore, it will be necessary to ensure a co-ordinated and consistent approach to development.

6.28 An analysis of the Council's Stage 1 Viability Assessment (Dixon Searle) has been carried out by Sturt & Co. A copy of this analysis can be found at Appendix B of these representations.

6.29 The analysis highlights a significant inconsistency in that the Dixon Searle reporting includes appraisals of development Scenarios of 1,050 dwellings, whereas the consultation is being undertaken on the basis of identifying an allocation for 800 dwellings (the residual requirement net of committed development), Sturt & Co question the relevance and legitimacy of Dixon Searle assessing the viability of 1,050 dwellings, noting that the obligations for the 250 committed dwellings are already secured through their respective permissions, and should not be included in viability modelling for 1,050 dwellings Scenarios, as appears to be the case in the Dixon Searle reporting.

6.30 Sturt & Co also highlight that requests were made to CDC for electronic copies of the Argus Appraisal worksheets for the appraisals at Appendix 2a of the Dixon Searle Assessment, but this information has not been provided on the basis that it is information that would need to be made available to all parties, which is not considered appropriate while the consultation process is underway. Consequently, it was not possible for Sturt & Co to undertake a full and detailed assessment.

6.31 However, the analysis has highlighted a number of significant issues relating to assumptions made by Dixon Searle in respect of Sales Values, Benchmark Land Value and Finance Rates – which have a significant impact on viability, both individually and cumulatively.

6.32 The analysis concludes that the viability position is challenging based on the issues outlined above. However, the inclusion of bridge infrastructure costs is the most concerning given the significance of these costs and the lack of any supporting cost analysis. Based on their analysis, there are strong indications that these costs have been significantly underestimated and as such the marginal viability position being reported is incorrect. Sturt & Co confirm that the viability of development is significantly compromised with a multi-modal bridge. Development is more likely to be viable with a pedestrian/cycle bridge. However, the absence of a vehicular bridge In this Scenario makes the viability position more favourable than Scenarios 1 and 2.

7. Sustainability Appraisal

7.1 To further demonstrate the benefits of Scenarios 4 and 5, Table 3.1 of the Sustainability Appraisal (SA) for the Southbourne Allocation Development Plan Document (DPD) has been reproduced and Scenarios 4 and 5 have been added.

7.2 As the DPD is at an early stage of the plan making process, it is agreed that in some cases it is difficult to differentiate between the Scenarios. This means that the "score" against the Objectives is the same across all five Scenarios. However, through the supporting commentary and having regard to the evidence set out in these representations, it is demonstrated that when ranking the five Scenarios, 4 and 5 are ranked higher than Scenarios 1, 2 and 3. This is largely due to the fact that 4 and 5 do not rely on a multi modal bridge and prioritise development close to existing services and facilities. This has positive effects in terms of air quality, mitigating climate change and accessibility. By removing the vehicular bridge, development viability is improved and the has a positive effect on the delivery of affordable housing.

7.3 The revised table can be found at Appendix C of these representations, together with commentary summarising the key findings.

8. Conclusion

8.1 Whilst the Vision for the proposed allocation is sound and based on sensible Objectives, there are underlying flaws in the rationale underpinning the Scenarios presented in this consultation.

8.2 The assessment of the opportunities and constraints quite rightly identifies the railway line as a barrier between the parts of the settlement north and south, and consequently this represents an issue in connecting a planned expansion of 800 dwellings which will inevitably require development north and south. However, this blunt assessment fails to properly engage with the very different context that applies to land north and south of the railway line in terms of sustainability and accessibility. The land south of the railway line is inherently sustainable due to the presence of existing services and facilities concentrated along the A259 corridor, access to an existing high frequency bus route on the A259, access to existing cycle infrastructure on the A259 and the presence of a train station within walking and cycling distance. This land also provides a direct access to the A259 whereby northbound crossings of the railway line may occur but will be very limited and infrequent. The land to the north is less sustainable, with more limited access to facilities and public transport opportunities. Access to the A27 is predominantly via the A259 where southbound (AM) and northbound (PM) crossings of the railway line will be more significant in number.

8.3 Alongside this the Council has generally approached the consultation on the basis that the existing railway crossings are unsafe and incapable of accommodating the level of development proposed without the provision of bridge infrastructure. No evidence is provided to substantiate this approach. There is no evidence of existing safety issues and the Council's own evidence regarding capacity (Stantec, 2023) does not support the need for bridge infrastructure ("may be beneficial"). As noted in our representations and the PBA Assessment at Appendix A, Stantec significantly overestimates the traffic impacts of planned development on crossings based on our more recent analysis (PBA, December 2024).

8.4 In failing to consider the context and not engaging in the evidence, the Council has embarked on a vehicular focused strategy which undermines the transport policy in the emerging Local Plan Review and conflicts with the NPPF (paragraphs 11, 108 and 109). It also has wider implications for the viability of allocation as the infrastructure costs associated with a vehicular led approach are significant, jeopardising the viability of other community infrastructure and compromising affordable housing delivery.

8.5 These representations highlight the flawed approach outlined above in respect of the suggested Scenarios 1 – 3, and set out the sound rationale and the significant benefits associated with alternative Scenarios 4 and 5. These alternative Scenarios maximise the development potential of the available land south of the railway line, where it is already sustainable. Adopting a precautionary density of 20dph would provide a minimum of 200 dwellings south of the railway line.

8.6 By achieving 200 dwellings south of the railway line, existing facilities and amenities, concentrated south of the railway line on then A259 corridor, would be supported alongside a new local centre to the north of the railway line providing complementary services – the new development north of the railway line would be concentrated on one side of the settlement – east or west – to ensure facilities were clustered and accessible over shorter distances via a single high quality pedestrian and cycle bridge. Consequently, proposed Scenarios 4 and 5 show the provision of pedestrian and cycle connections across the railway line, where land has already been safeguarded for this purpose. This would ensure that the community (north and south of the railway line) is well connected to existing and new facilities, removing the barrier that currently exists in a sustainable manner. It would also provide a more positive approach to placemaking and reduce vehicular traffic in line with the Local Plan transport strategy (Policy T1) and the NPPF (paragraphs 11, 108 and 109).

8.7 Whilst there is no evidence or justification for a vehicular bridge for a maximum 800 dwellings north of railway line (based on Scenario 3), the level of development north of the railway line would be limited to 600 dwellings in Scenarios 4 and 5, reducing the impact of vehicular traffic on crossings. The provision of a new pedestrian and cycle bridge to provide direct and convenient connections would further reduce this impact and genuine opportunities would be provided to encourage modal shift. The absence of a vehicular bridge and its significant cost would alleviate the acknowledged pressure on viability so the delivery of affordable housing and community infrastructure would not be compromised, as would be the case for Scenarios 1 and 2. The provision of a single pedestrian and cycle bridge would also address alleviate similar pressure on viability for Scenario 3 where two such bridges would need to be provided.

8.8 In summary, the alternative Scenarios 4 and 5 support the delivery of the Local Plan Review and the Vision and Objectives of the Southbourne DPD, unlike Scenarios 1, 2 and 3. For these reasons, it is considered that they represent a far more justified and sustainable basis on which to deliver development in the BLD.

Appendix A: Transport Evidence

Please see separate document prepared by Paul Basham Associates.

Appendix B: Viability Evidence

Please see separate document prepared by Sturt & Co.

Appendix C: Sustainability Evidence

Table 3.1 (amended) Summary of appraisal findings

		Scenarios				
SA Topic		**1: West**	**2: East**	**3: Mixed**	**4: South and West**	**5: South and East**
Air/env quality	Rank	4	3	5	1	2
	Sig effect	Uncertain	Uncertain	Uncertain	Uncertain	Uncertain
Biodiversity	Rank	5	2	3	4	1
	Sig effect	Negative -	Uncertain	Negative -	Negative -	Uncertain
Climate change adaptation	Rank	4	5	3	2	1
	Sig effect	Negative -	Negative -	No	No	No
Climate change mitigation	Rank	3	3	4	1	2
	Sig effect	No	No	Negative -	No	No
Communities and health	Rank	3	3	4	1	2
	Sig effects	Positive +	Positive +	Positive +	Positive +	Positive +
Economy and employment	Rank	3	3	3	1	2
	Sig effects	Positive +	Positive +	Positive +	Positive +	Positive +
Historic environment	Rank	1	5	3	4	1
	Sig effects	Negative -	Negative -	Negative -	Negative -	Negative -
Housing	Rank	2	2	2	1	1
	Sig effects	Positive +	Positive +	Positive +	Positive +	Positive +
Land soils and resources	Rank	2	2	3	1	1
	Sig effects	Negative -	Negative -	Negative -	Negative -	Negative -
Landscape	Rank	4	2	5	3	1
	Sig effects	Negative -	Negative -	Negative -	Negative -	Negative -
Transport and accessibility	Rank	3	4	5	1	2
	Sig effects	Negative -	Negative -	Negative -	No	No
Water	Rank	3	2	2	1	1
	Sig effects	No	No	No	No	No

Commentary

Air/Environmental Quality

8.9 Paragraph 3.7 of the SA methodology (AECOM, September 2024) notes that the impacts on air quality largely depend on the degree to which each option proposes to manage an increase in traffic and congestion. Scenarios 4 and 5 perform favourably as they do not rely on a multi modal bridge, which would encourage car journeys, particularly around the village. They also maximise land to the south

where existing services and facilities and easily accessible by foot or cycle and where there is a bus route along the A259. Scenario 4 performs more favourably as it locates the new primary school alongside the existing secondary school, reducing the need to travel between the two sites and dis-incentivising short vehicle trips which would have a negative effect on air quality.

8.10 Scenarios 1, 2 and 3 perform less favourably as they either rely on a multi modal bridge and/or they locate development north of the railway, away from existing services, facilities and public transport. The emphasis on sustainable transport and the corresponding reduction in traffic, means that whilst uncertainty remains at this stage, Scenarios 4 and 5 are ranked higher. Once mitigation is identified and the proposals progress, the level of uncertainty will decrease.

Biodiversity

8.11 By directing development to the southern part of the BLD, the impact on the Brent Geese Secondary Support Area (BGSSA) will be reduced, particularly in Scenario 5 which directs development north of the railway to the east.

8.12 The areas of traditional orchard to the east are noted (paragraph 3.13), although as identified at paragraph 3.15, impacts on biodiversity can be mitigated through design. As such, an uncertain effect is recorded at this stage, which is likely to improve as proposals progress.

8.13 As noted in the SA, it can be difficult to determine significant effects on biodiversity as these are largely dependent on mitigation measures, particularly during the design phase (paragraph 3.15). The ability to differentiate between Scenarios at this early stage is therefore difficult. Nevertheless, the reduced impact on BGSSA in Scenario 5 (as well as Scenario 2) is beneficial.

Climate Change Adaptation

8.14 Paragraph 3.16 of the SA notes that there are areas at high risk of flooding north of the railway line, in close proximity to the proposed multi modal bridge (Scenarios 1 and 2) which will potentially affect access. The sequential and exception tests may apply. Scenarios 4 and 5 do not rely on a road bridge, reducing the risk. This is also applicable to Scenario 3, albeit there are negative effects associated with the increased distance from existing services and facilities, resulting in a lower ranking.

Climate Change Mitigation

8.15 Paragraph 3.20 of the SA notes that the built footprint of Southbourne will increase under all Scenarios and this will result in an increase in emissions. It goes on to note that Southbourne has existing services and facilities, which creates a more positive picture when considering per capita emissions. In this regard, Scenarios 4 and 5 perform more favourably as they direct development to the areas closest to these services and facilities first.

Paragraph 3.22 of the SA states that, "as all three options deliver the same quantum of growth, they will likely lead to similar overall emissions. This is not considered accurate. While growth may be the same, when people can benefit from sustainable transport choices, there will be a positive effect on climate change mitigation. Scenarios which provide alternatives to a road bridge, will dis-incentivise short car journeys. Scenarios which prioritise walking and cycling (Scenarios 4 and 5) are ranked higher.

Communities and Health

8.16 As a correction, we disagree with the conclusion that new services and facilities would be closer to the village centre (paragraph 3.25)

8.17 In addition, we do not believe that Scenario 3 has a positive effect on this objective as it disperses facilities and is not served by existing facilities. The amended table 3.1 reflects this.

8.18 Whilst all Scenarios will deliver open space and a part of the Green Ring, Scenarios 4 and 5 perform more favourably as they prioritise walking and cycling as the preferred mode of transport around Southbourne, providing opportunities for people to interact. Scenario 4 performs most favourably as it also locates the primary school next to existing facilities, creating an opportunity for a community hub around the schools and leisure centre.

8.19 The land south of the railway line is already well served by existing facilities and amenities, including access to high frequency rail and bus services and a strategic cycle route – with the potential to improve through the creation of the CHEMROUTE. Providing development to the south of the railway line will help ensure that these existing facilities and amenities are sustained alongside of a new local centre focussing on complementary services. The provision of pedestrian and cycle connections on one side of the settlement, where land has already been safeguarded for this purpose, would ensure that the community (north and south of the railway line) was connected, providing a more positive approach to placemaking. This means that whilst all Scenarios will have a positive effect on this objective, Scenarios 4 and 5 are ranked higher.

Economy and Employment

8.20 Whilst the SA concluded that it is difficult to differentiate between Scenarios 1, 2 and 3, Scenarios 4 and 5 perform more favourably due to their proximity to existing businesses along the A259 which provide employment opportunities as well as the regular bus service which provides links to employment opportunities in Emsworth, Havant, Portsmouth and Chichester. In addition, in delivering homes close to these existing businesses, the local economy will benefit.

8.21 Scenario 4 potentially performs better in relation to the industrial estate at Clovellly Road, development in Scenario 5 would be closer to the railway station. They have therefore been assessed equally against this objective.

Historic Environment

8.22 As noted at paragraph 3.36 of the SA, all of the Scenarios are in proximity to heritage assets. This includes Scenarios 4 and 5. However, it is recognised that the impacts will largely depend on the design and layout of development, so the negative effect is likely to be mitigated as proposals progress for all Scenarios. Hence a degree of uncertainty is noted (paragraph 3.36).

8.23 The ranking set out in amended Table 3.1 is currently based on a high level assessment which reflects the location of heritage assets. As the nature and extent of historical assets and settings is identified, the assessments and rankings may be refined.

Housing

8.24 Scenarios 4 and 5 will deliver the same quantum of development (800 homes) as Scenarios 1, 2 and 3 but place less pressure on the viability of the development. This provides more certainty on housing delivery. The Assessment Framework displayed on board 7 of the consultation exhibition shows that Scenarios 1 and 2 have a significantly poor/negative effect on deliverability (viability). As viability is at best, marginal, the inclusion of a road bridge jeopardises the delivery of housing and in particular, the delivery of affordable housing. This will have negative implications for the creation of a well-balanced community with a mix of house types and tenures.

8.25 The SA also notes a severance between the existing community to the south and proposed development to the north. This would be reduced, albeit not removed, through Scenarios 4 and 5 which seek to integrate new development with existing to the south. The creation of pedestrian and cycle bridges will help integrate communities.

Land, Soils and Resources

Land to the south of the railway line is in smaller parcels and generally unsuitable for agriculture. Further north, land becomes more open and suitable for farming. As Scenarios 4 and 5 maximise land to the south first, less land will be required from the north, having less of an impact on the loss of agricultural land. Scenarios 4 and 5 are therefore ranked higher. As they do not extend as far north as Scenarios 1, 2 and 3, there will also be reduced pressure on the land around the gas pipeline.

Landscape

8.26 Land to the south of the railway is more contained and surrounded by existing development, particularly in Scenario 5. The landscape becomes more open further north and therefore, new development will be more visible and closer to the South Downs National Park. The SA notes the potential for coalescence between settlements along the A259 (paragraph 3.48). However, Scenario 4 would retain a gap between Southbourne and Hermitage and Scenario 5 is bordered to the east by the strategic wildlife corridor. The more contained and enclosed character of land to the south and the retention of gaps between

settlements mean that Scenarios 4 and 5 will have less of an impact in landscape terms and therefore, perform more favourably.

8.27 The Local Plan identifies a landscape gap to the west. Whilst there are likely to be negative effects on landscape with all 5 Scenarios, the eastern Scenarios are ranked higher as they direct development away from this gap.

Transport and Accessibility

8.28 The DPD places an unjustified emphasis on facilitating vehicle journeys. This is particularly true of Scenarios 1 and 2 which include a road bridge over the railway. This does not support the objective of contributing to the achievement of sustainable development (paragraph 16a of the NPPF).

8.29 The transport and accessibility benefits of Scenarios 4 and 5 are set out in these representations. Given that a new multi-modal bridge is unjustified, Scenarios 4 and 5 propose measures which reduce the need to travel by locating development in the first instance, close to existing services and facilities. Secondly, they promote walking and cycling and will be designed to ensure it is convenient, safe and enjoyable to use these modes of transport instead of the private car. They will help deliver the CHEMROUTE along the A259, improving access to Chichester, Emsworth and Havant for cyclists. Finally, development south of the railway benefits from existing public transport (bus and rail).

8.30 Whilst Scenarios 4 and 5 both perform positively, Scenario 4 is ranked higher due to the opportunity to co-locate the schools and other local infrastructure around a community hub.

Water

8.31 As the quantum f development is the same in all Scenarios, they will have similar impacts on water supply.

8.32 The SA notes that the Ems Water Body borders the north of Southbourne Parish and overlaps slightly with the Parish to the north-west (paragraph 3.72). Scenarios 4 and 5 direct development away from the northern part of the BLD, limiting the effects on this catchment.