



**LRM**  
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LIMITED

# Chichester Local Plan Review 2035

Preferred Approach

Representations on behalf of Hallam Land Management Limited

February 2019



# Report Control

**Project:** Southbourne

**Client:** Hallam Land Management Limited

**Job Number:** 17.166

**File Origin:** 17.166/Preferred Approach Representations

## Document checking

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Initialed: OJ

Issue	Date	Status	Checked for issue
A	18/01/19	First Draft	KC
B	29/01/19	Second Draft	KC
C	01/02/19	Third Draft	OJ
D	07/02/19	Final	OJ



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# 1 Introduction

- 1.1 These representations have been prepared on behalf of Hallam Land Management Limited in response to the Chichester Local Plan Review 2035 Preferred Approach consultation.
- 1.2 Hallam is a strategic land promotion company operating throughout England, Wales and Scotland delivering land for new employment and commercial premises, housing and mixed-use developments. Hallam has been acquiring, promoting, developing and trading in land since 1990. During that time, the company has established an outstanding record in resolving complex planning and associated technical problems in order to secure planning permissions for a whole range of different land uses and facilitate the delivery of new development.
- 1.3 Hallam control land to the west of Southbourne, to the north of the A259 and south of the railway line. Development of this land for new housing, as shown in the accompanying Vision Document, would be consistent with the established spatial strategy which is rightly retained in the consultation document and would contribute towards meeting the future housing needs of the District.
- 1.4 In this context, our response is focused on the following matters:
  - The development strategy, settlement hierarchy and the distribution of development across the District;
  - The overall amount of new housing required within the new plan period;
  - The status of Southbourne and the role and function it plays; and
  - The strategic allocation proposed at Southbourne in Policy AL13.
- 1.5 In preparing the Local Plan Review, the Council will need to ensure that it complies with paragraph 35 of the National Planning Policy Framework (NPPF) which sets out four tests to ensure the plan is 'sound'. These are as follows:
  - Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet needs from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.



## 2 Objectives and Spatial Strategy

### Objectives of the Local Plan

- 2.1 The Preferred Approach has identified key challenges and opportunities that influence future planning in the District and has demonstrated how it aims to address these through planning policies and proposals.
- 2.2 Within the consultation document, the strategic objectives presented by the Council are structured into specific categories, ensuring housing and neighbourhood objectives are clearly set out for the plan period.
- 2.3 Amongst these is the objective to increase housing supply; increase affordable housing; and promote the development of mixed, balanced and well-integrated communities. These are consistent with the NPPF's policy objective to significantly boost the supply of housing in paragraph 59 and in this context, it is right that the Local Plan's development strategy is founded on this, ensuring sustainable development and meeting the needs of the plan area.
- 2.4 The objectives set out evidently frame the policies and proposals for future development across the plan area to create sustainable neighbourhoods; this demonstrates that the Local Plan has been *positively prepared and justified*.

### Spatial Strategy

- 2.5 Section 4 of the Preferred Approach outlines the Spatial Strategy for the District. This provides strategic policies for key topic areas, housing, employment, retail, transport and infrastructure and identifies the sort place the District aims to be by the end of the plan period. This accords with paragraph 20 of the NPPF which requires strategic policies to set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing, infrastructure, community facilities along with policies that seek to conserve and enhance the environment.
- 2.6 The NPPF requires at paragraph 21 that "*plans should make explicit which policies are strategic policies. These should be limited to those necessary to address the strategic priorities of the area...*". Section 4 complies with the NPPF; the strategic policies set out in the consultation document relate to the requirements mentioned.

### Policy S2: Settlement Hierarchy

- 2.7 The consultation document sets out a Settlement Hierarchy which is to serve as the framework for the Council to *achieve* its vision for the plan area, meet the scale of development required and enhance the quality of the built natural, historic, social and cultural environments, whilst sustaining the vitality of communities. This hierarchy seeks to deliver sustainable development that will support the role and function and different places within the plan area.
- 2.8 In this regard, the Preferred Approach Settlement Hierarchy is consistent with the NPPF which encourages "*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, improve air quality and public health.*" (paragraph 103



refers). The Settlement Hierarchy ensures that new development is located in areas where residents have access to facilities and services and a range of public transport networks.

- 2.9 Within the Preferred Approach, Chichester is identified as the Sub-Regional Centre, with four Settlement Hubs being identified at East Wittering/Bracklesham; Selsey; Southborne and Tangmere. This is a continuation of the existing spatial strategy in the Adopted Local Plan consistent with the principle of locating new development at the most sustainable locations. The Preferred Approach states at paragraph 4.13 that: *“The Settlement Hierarchy has informed the strategy for housing development at Chichester City and the Settlement Hubs based on the circumstances and opportunities relevant to each as detailed below.”*
- 2.10 Accordingly, this strategic policy is *positively prepared and justified*, and is consistent with national policy promoting sustainable patterns of development.

### Policy S3: Development Strategy

- 2.11 The Preferred Approach sets out in Policy S3 the Development Strategy for the District. Drawing upon the Settlement Hierarchy in Policy S2, this identifies the broad approach to providing sustainable development in the plan area, and how development will be distributed across the District.
- 2.12 There is a particular focus within the Preferred Approach for development to be concentrated within the “east-west corridor”, as evident from Map 4.1 Key Diagram. This reflects the fact that this corridor has the best transport connections within the District.
- 2.13 As such, the Development Strategy distributes new residential development in accordance with the Settlement Hierarchy. The Preferred Approach states at paragraph 3.5 that *“most of the new development will be well located in and around the main settlement of Chichester together with Tangmere and Southbourne.”* At paragraph 12.3 it further states that this approach is aimed at *“provid[ing] opportunities to achieve wider infrastructure improvements that will benefit the whole area.”*
- 2.14 Located centrally within the east-west corridor, Chichester is the largest settlement within the District and is the focus for new development.
- 2.15 Elsewhere within the corridor are located the Settlement Hubs of Southbourne and Tangmere, in effect at either end of the corridor. In this regard Southbourne and Tangmere, are materially different to East Wittering and Selsey. Rightly a greater level of new development is directed towards Southbourne and Tangmere in comparison.
- 2.16 Together, this demonstrates that the Council are proposing to proportionately direct future development to those locations in the District which are the most sustainable and will be able to meet the needs of the residents through provision of employment opportunities and local facilities with associated infrastructure improvements and public transport links. This reflects a balanced distribution strategy.
- 2.17 The NPPF requires at paragraph 23 that *“broad locations for development should be indicated on a key diagram...”*. Within the Preferred Approach, ‘Map 4.1 Key Diagram’ identifies the broad locations for strategic housing and employment sites. This diagram complies with the NPPF as it demonstrates where the Local Plan will be proposing strategic allocations to address the objectively assessed needs over the plan period.



2.18 Through the clear distribution of development at sustainable locations and providing key diagrams to present this, the Local Plan is being *positively prepared and justified* and is effectively implementing this strategic policy.



### 3 Overall amount of Housing

#### Housing Needs for the Plan Area

- 3.1 Paragraph 60 of the NPPF states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance.
- 3.2 Only in exceptional circumstances could an alternative approach be justified. But even then, that alternative approach will also need to reflect current and future demographic trends and market signals.
- 3.3 Policy S4 of the Preferred Approach identifies the need for the Plan to make provision for at least 12,350 dwellings, based on the 2018 Chichester Housing and Economic Development Needs Assessment. Across the plan period this amounts to 650 dwellings per annum.
- 3.4 This is greater than the 609 dwellings per annum drawn from the Government's standard methodology.
- 3.5 The Preferred Approach states at paragraph 4.22 that this provision of housing is accommodating unmet need arising from the Chichester District part of the South Downs National Park as well. Paragraph 24 of the NPPF outlines the need for co-operation between local planning authorities on strategic matters that cross administrative boundaries. The Preferred Approach demonstrates the considerations it has made towards this neighbouring authority, this shows how the plan has been effective in working with other authorities and from this how the plan has been *positively prepared*.
- 3.6 The Preferred Approach identifies ways in which the supply of housing over the plan period will be met, which includes strategic allocations from the current Local Plan 2014-2029, new strategic allocation and new sites to be identified at a parish level through Neighbourhood Plans.
- 3.7 From this, the Preferred Approach allocates 10,056 dwellings within the east-west corridor for the plan period. This is consistent with the Settlement Hierarchy and the Development Strategy, policies S2 and S3, and the overarching objective of locating new housing at the most sustainable locations in the plan area.
- 3.8 The NPPF states at paragraph 22 that strategic policies should look ahead over a minimum 15 year period from the date of the Plan's adoption. The Local Plan aims to cover the period of 2016-2035, which is 19 years. However, this plan has not been adopted yet and it is considered unlikely that this Local Plan will be adopted before 2020. The Plan may not therefore cover the required plan period of 15 years and the Council may wish to consider extending the plan period to ensure this is met.





## 4 Southbourne

- 4.1 Southbourne is a key area in the District, both in terms of existing development and status as a Settlement Hub and the potential for future development.

### Role of Southbourne

- 4.2 The Preferred Approach identifies Southbourne as a Settlement Hub within Policy S2.
- 4.3 Southbourne is located within the east-west corridor with a range of existing facilities and with good transport links and employment opportunities both to the east and the west.
- 4.4 Within Southbourne there is good access to educational facilities serving the residents, including primary schools, junior schools and secondary schools. There are a number of convenience stores and other community services and facilities such as a GP practice, pharmacy and places of worship.
- 4.5 The Bourne Community Leisure Centre provides local residents with access to community sports facilities. Access to public open space is also good through connections to Southbourne Recreation Ground. There is potential for more open space to be provided for local residents within the Local Plan Review and the strategic allocation proposed.
- 4.6 The strong public transport links within Southbourne to the wider surrounding area allows access to employment opportunities within the east-west corridor. Southbourne has strong public transport connections to the local and wider area, through bus and train services, to areas including: Portsmouth, Havant, Littlehampton, Brighton, Southampton and London.
- 4.7 For these reasons, Southbourne is rightly designated as a Settlement Hub and is eminently suitability to serve as a location for the strategic allocation of residential development.

### Strategic Allocation AL13

- 4.8 Policy AL13 proposes a minimum of 1,250 dwellings at Southbourne and to be identified in the revised Southbourne Neighbourhood Plan. This strategic allocation is to act as a mixed use extension to the existing settlement.
- 4.9 The Policy prescribes a number of requirements that must be met (criterion 1 – 16). These are considerations that reflect principles of place making and sustainable development and provide a sound framework for the preparation of the Neighbourhood Plan.
- 4.10 One of these requirements states that future development address “*opportunities as they arise to improve the situation relating to the various existing or planned railway crossing.*” The existing Southbourne Neighbourhood Plan outlines the issues relating to the railway crossing and the plans for addressing this challenge in the future.
- 4.11 Related to this is the need for the “*provision of suitable means of access to the site(s) and securing necessary off-site improvements (including highways) to promote sustainable transport options.*”
- 4.12 The combination of the requirements relating to the railway crossing and the provision of a



suitable means of access show the importance of accessibility to the A257 which is the principal public transport corridor.

- 4.13 Another requirement is to provide a location for the strategic site which will be a sustainable extension of Southbourne. This will require new development to be integrated with the existing urban areas.
- 4.14 The remaining requirements of Policy AL13 cover the quality and range of development, the provision of a new primary school and extension to the secondary school, provision of public open space and green infrastructure, provision of community infrastructure, and the impact of development on the landscape. These are each appropriate considerations for the Neighbourhood Plan to address.
- 4.15 Having regard to the above, the allocation of a minimum of 1,250 dwellings for Southbourne is appropriate when relating this to the identified objectively assessed need for housing across the plan area and the spatial and development strategies. It is acknowledged that there will need to be carefully consider infrastructure, in particular, highway improvements alongside this development. The Preferred Approach has *justified* its reasoning behind the housing needs and the role of Southbourne as a Settlement Hub and therefore the principle of a strategic allocation for residential housing is considered appropriate.

## Southbourne Neighbourhood Plan

- 4.16 The Preferred Approach states at paragraph 6.89 that “*Southbourne Parish Council is preparing a revised neighbourhood plan for the parish which will identify potential development site(s) and the Council will work closely with the Parish Council in the neighbourhood planning process.*” The specific site allocation will therefore be determined and presented within the revised Southbourne Neighbourhood Plan which is currently being prepared alongside the Local Plan Review.
- 4.17 The Parish Council have defined a number of key areas which will be a focus in considering future development opportunities, these include: transport, connectivity, community infrastructure, green infrastructure, biodiversity, place, phasing, future proofing and dwelling types and mix.
- 4.18 The Southbourne Neighbourhood Plan highlights the issue of congestion at the existing railway crossing within the centre of Southbourne and the need to improve pedestrian safety. This is also a key objective in the emerging Neighbourhood Plan.
- 4.19 Proposal 3 of the existing Neighbourhood Plan demonstrates that the Parish Council have safeguarded land to the west of Southbourne for the provision of a new road and a crossing of the railway line. Paragraph 5.13 of the Southbourne Neighbourhood Plan states that “*the first part of this road link can be achieved within the plan period within the proposed housing allocation site on ‘Land at Gosden Green.’*”
- 4.20 Since the publication of this Neighbourhood Plan the land at Gosden Green has been developed and the first part of land for the link road secured.
- 4.21 Through the review of the Local Plan, and the preparation of a new Neighbourhood Plan, the strategic allocation will allow the provision of the new rail crossing and road to come forward in conjunction with further new development.
- 4.22 Paragraph 69 of the NPPF states that “*Neighbourhood planning groups should also consider the*



*opportunities for allocating small and medium-sized sites suitable for housing in their area.”*

Southbourne Parish Council should be aware of this when allocating the strategic sites, to ensure that there are a mix of housing sites, that could come forward sooner than the principal element of the larger strategic site.

- 4.23 Through the preparation of the Neighbourhood Plan, the Parish Council should take into account the allocation of smaller sites, which could come forward as part of and alongside the larger strategic site. This will ensure that there is not a delay in the provision of housing within Southbourne and the plan area.



## 5 Conclusion

- 5.1 These representations are submitted on behalf of Hallam Land Management Limited.
- 5.2 In the context of national, local and neighbourhood planning, the Local Plan has an important role in providing policies and proposals for residential development to meet future needs.
- 5.3 The proposed objectively assessed need for housing across the plan area is justified and positively contributes to a sound Plan. Although, the Council may need to consider extending the plan period to ensure it meets the requirements of a minimum of 15 years in the NPPF.
- 5.4 Consistent with the established strategy to focus development in the District's east-west corridor, the proposed allocation of a minimum 1,250 dwellings to Southbourne as a Settlement Hub is, as a matter of principle, a sound proposition. The Key Diagram identifies the broad location for this development to the west of the settlement.
- 5.5 The responsibility for allocating additional development land to meet this requirement has been given to the Parish Council through the preparation of a new Neighbourhood Plan. This gives the Parish Council opportunity to move forward with the objective to create a new railway crossing to the west of Southbourne.
- 5.6 Whilst the scale of development proposed is strategic in nature, it is entirely appropriate to consider how different development parcels might contribute towards that and in particular early opportunities that facilitate larger scale development later in the plan period.
- 5.7 To this end, land to the west of Southbourne and south of the railway line could be allocated as the first phase of the strategic site allocation so that this southern section of the new link road is built to enable access to land to the north. This will reduce the pressure placed on the centre of Southbourne and the existing railway crossing.
- 5.8 By including smaller sites as part of the overall allocation, this will bring forward development at a quicker pace and ensure that the objectively assessed needs for housing across the plan area are met each year.
- 5.9 Hallam control land to the west of Southbourne, which adjoins the land at Gosden Green which has already been built. The land controlled by Hallam could be allocated as part of the strategic allocation of Southbourne, ensuring land is readily available for residential development.
- 5.10 This would be consistent with the development strategy for the Plan and positively contribute towards meeting future development needs of the plan area.
- 5.11 These representations have demonstrated that the Preferred Approach of the Local Plan Review shows how the Local Plan is being *positively prepared and justified*.