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Chichester District Council  
East Pallant House  
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Chichester  
PO19 1TY

13<sup>th</sup> December 2024

Our Ref:13021  
Your Ref:

Dear Planning Policy Team,

### **Southbourne Allocation DPD Regulation 18 Consultation October 2024**

This response to the Southbourne Allocation DPD (Regulation 18) has been prepared on behalf of our client, Elvia Homes Ltd (Southern Region). Our client previously made representations on the Chichester Local Plan 2021 – 2039 ‘Proposed Submission’ (Regulation 19) in March 2023 and participated in the recent Local Plan Examination hearing sessions regarding Matter 4C Housing and Matter 6 Area Policies and Allocations. Our client has provided overall support for the Proposed Submission Local Plan Policy A13 Southbourne Broad Location for Development and the inclusion of ‘Land at Cooks Lane’ within the BLD. Our client has land interests at:

- Land at Cooks Lane, Southbourne
- Land at Penny Lane, Hermitage

These sites are fully within our client’s control and there are no legal issues to constrain these sites coming forward in the next 5 years. Our client has engaged with the Council in the early preparation of the Southbourne Allocation DPD in relation to ‘Land at Cooks Lane’. We welcome the opportunity to continue to work closely with the Council and landowners through the next stages in the preparation of the DPD to ensure a comprehensive and co-ordinated approach.

Notwithstanding our client’s interests this response has been prepared in recognition of the prevailing planning policy and guidance, in particular the National Planning Policy Framework (NPPF), 20<sup>th</sup> December 2023 and the Planning Practice Guidance (PPG). Consideration is also given to the draft NPPF (July 2024) as this is of particular relevance to the Government’s

response to the housing crisis and expectation for Local Authorities to ‘make every effort to allocate land in line with their housing need as per the standard method’<sup>1</sup>.

This letter sets out a response to the Council’s consultation questions for the Southbourne Allocation DPD Regulation 18 document. This includes a response to the benefits and challenges identified by the Council for each of the 3 growth scenario options and our view on the most sustainable growth option to pursue through the draft DPD. Our response also refers to the Southbourne Allocation DPD Appendix A ‘Assessment Framework’ and accompanying Sustainability Appraisal.

## **Southbourne Allocation DPD Regulation 18 Consultation Document**

Our response to the 3 growth scenarios reviews the key benefits and challenges identified for each scenario, their significance and impact on deliverability of the allocation in accordance with national policy requirements and the Submission Local Plan.

### **Scenario 1 – Land to the West**

#### **Q2 - Do you agree with the list of benefits and challenges?**

**Housing Delivery** - It is considered that all 3 scenarios should consider capacity to provide over and above 800 homes to provide flexibility in supply to ensure the Local Plan housing requirement is met. This will take account of potential unforeseen factors which may affect delivery of land parcels within the allocation option areas. In view of landscape sensitivity constraints associated with scenario 1, including local gap, it is uncertain whether 800 dwellings can be delivered, and this should be reflected as a challenge.

**Green Ring** - This scenario may enable the delivery of the western section of the Southbourne Green Ring, which is identified as a benefit. However, it should also be identified as a challenge that this scenario does not provide the opportunity to comprehensively deliver the Green Ring, which is achievable in Scenario 3.

**Landscape Impact** - We agree with the identification of impact on landscape gap as a key challenge and constraint for this scenario. This scenario includes an area identified as part of the Hermitage and Southbourne Local Gap from the Landscape Gap Assessment (CDC, 2019). Furthermore, the location of the existing gas pipeline through the north of this scenario is likely to push development closer into the landscape gap and affect the integrity of the gap. Therefore, it is considered that this scenario may affect the integrity of the local gap and it is uncertain whether the provision of a landscape corridor on the western edge of the scenario will enable appropriate mitigation of impact and delivery of c800 homes.

**Transport Impact** - The draft DPD raises a challenge regarding potential transport impact if a multi-modal vehicular bridge is not delivered as part of this scenario and the impact of increased footfall on the pedestrian level crossing at Church footpath. The potential impact will need to be robustly explored with Network Rail and necessary transport modelling undertaken by the Council.

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<sup>1</sup> Written Ministerial Statement 30.07.24

**Flood Risk** - There are surface water flooding constraints affecting this scenario on the western edge of Southbourne particularly affecting land to the north of the railway line but also land to the south. The Environment Agency surface water flood maps identify a significant area north of the railway line on the western edge affected by high risk (3.3% chance each year) and medium risk (1 – 3.3% chance). In accordance with NPPF paragraph 167 a sequential approach should be applied to plan making taking account of all sources of flood risk and the current and future impacts of climate change. In the absence of a sequential test for the scenario area to assess whether there are any reasonably available alternative sites in areas of lower flood risk and in view of landscape gap constraints it is uncertain whether this scenario is capable of delivering c800 dwellings.

**Utilities Consultation Area** – It is appropriate to identify the challenge concerning the percentage of land for development including the access road being located within the utilities consultation zone. This may affect the deliverability of key utility and infrastructure requirements required for the sustainable delivery of this scenario.

**Brent Geese** - It is appropriate to identify that this scenario would result in a significant loss of land within the Brent Geese ‘Secondary Support Area’, which would need to be mitigated. A clear strategy is required to demonstrate this is capable of mitigation.

**Landownerships** - The draft DPD identifies a key benefit that the northern side of the site allocation could be largely facilitated by a single landowner which may support a co-ordinated and comprehensive approach to master planning and delivery of infrastructure. With this scenario, there is a potential disadvantage in relying on a single landowner if any specific deliverability issues arise. The delivery of Scenario 1 (Land to the West) also requires co-ordination of land ownerships south of the railway line which should also be identified as a potential challenge. Scenarios 2 and 3 involve the co-ordination of land ownerships but delivery is not reliant on a single landowner and there is potential for development to come forward earlier in the Plan period with land parcels coming forward concurrently.

### **Growth Scenario Ranking**

This scenario should be ranked 3<sup>rd</sup> in order of sustainability and consistency with national and local policy in comparison to Scenario 2 and 3. Scenario 1 ‘Land to the West’ is the most constrained growth option in terms of landscape gap, ecology, transport and flood risk impacts, which raises significant uncertainty regarding the ability to sustainably deliver c800 dwellings.

### **Q3 - Are there any other benefits and challenges you feel should be included?**

**Housing Capacity** - As set out above it will be necessary to identify the potential challenge associated with this option in delivering c800 dwellings when landscape gap, ecology, flood risk and potential highways capacity constraints are considered through the DPD.

**Distribution of Development** - In comparison to Scenario 3 the approach to the distribution of development on the western edge provides a less balanced delivery of growth. Scenario 3 provides an opportunity to balance the distribution of c800 dwellings, which is also likely to be

more deliverable in terms of highways impact and in view of landscape and flood risk constraints in the western scenario.

**Transport Impact** - It should be recognised as stated in the SA that Scenario 1 performs least well in transport terms as it relies on the provision of a singular multi modal bridge, only has one point of vehicular access, provides no opportunity to improve pedestrian and cycle access to the railway station and creates a barrier to movement and integration between new development and existing development in the village.

**Ecology** - In ecology terms the SA identifies that this scenario has the potential to impact on the ecological status of the Ems Water Body (bordering the north of Southbourne Parish) which is vulnerable and currently has poor ecological status as confirmed by the Environment Agency<sup>2</sup>. This should be reflected in the challenges for this scenario.

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

The draft DPD raises a challenge concerning the potential transport impact if a multi-modal vehicular bridge is not delivered as part of this scenario and the increased footfall on the pedestrian level crossing at Church footpath. The potential impact will need to be explored with statutory providers including Network Rail and appropriate transport modelling will need to be undertaken by the Council in preparation of the DPD. It is uncertain at this stage what the impact of not delivering the bridge will be.

#### **Scenario 2 – Land to the East**

#### **Q5 - Do you agree with the list of benefits and challenges?**

**Pedestrian Railway Footbridge** - This scenario identifies the potential to deliver land for a pedestrian and cycle bridge adjacent to the railway line within 'Land at Cooks Lane' which is also a priority of the Southbourne Neighbourhood Plan. This will enable a connection to the Green Ring south of the railway line, Southbourne Infant and Juniors School and services / facilities in the village. The land to facilitate the crossing between the Land at Cooks Lane and Priors Orchard to the south of the railway line is within the control of our client, Elivia Homes. The railway crossing is deliverable and ongoing engagement is being undertaken with the Council and Network Rail regarding design and delivery of the bridge.

**Green Ring** - It is appropriate to identify the benefit associated with the delivery of the eastern section of the Green Ring. This scenario includes 'Land at Cooks Lane', which is required to deliver a large proportion of the Green Ring to the north of the railway line, linking to the Green Ring to the north and also to the south (Priors Orchard) through the provision of the railway footbridge.

**Multi Modal Railway Bridge** – There is a potential benefit associated with the delivery of a new multi-modal vehicular bridge that would connect the A259 to Priors Leaze Lane through various parcels of land east of Inlands Road. It is identified that this would relieve pressure from the

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<sup>2</sup> <https://environment.data.gov.uk/catchment-planning/WaterBody/GB107041012370>

crossing point at Inlands Lane, and congestion at the Stein Road crossing. The requirement to deliver the bridge is a matter for the Council to explore with statutory providers, including Network Rail. The Council should undertake appropriate transport modelling as part of the preparation of the DPD to determine the impact of this scenario if the bridge is not delivered.

**Education Provision** - This scenario enables the delivery of a new 2FE school, which is a clear benefit. This option is supported and will enable a more balanced distribution of education provision in Southbourne Village, distributing traffic across the village and providing associated pedestrian, cycle connections and links to the Green Ring.

**Landscape Impact** - In landscape terms this scenario does not have a significant landscape impact and maintains the integrity and purposes of the Southbourne to Hambrook Local Gap identified in the Landscape Gap Assessment (2019). This scenario also retains the landscape corridor to the wildlife area to the east and has the ability to integrate existing water resources within a blue and green infrastructure strategy. This scenario also proposes to deliver development in the least constrained parts of the Parish, in accordance with the Landscape Capacity Study for Chichester (2019). The landscape corridor to the eastern edge also provides a spatial and visual gap to the north of the railway line. In landscape terms there is no constraint on delivery of c800 homes and this scenario performs better than Scenario 1 – Land to the West where the wider allocation option is more constrained in landscape terms.

**Gas Pipeline** - In relation to the location of the gas pipeline it is understood that this would not constrain the sustainable delivery of c800 dwellings within this scenario. There will be a requirement for the Council to engage with statutory consultees regarding land within the consultation zone and the delivery of the northern access point connecting to Stein Road.

**Site Access** - This scenario identifies the potential for a secondary access from South Lane to Stein Road and it is appropriate that the Council undertakes further technical work regarding options to achieve access in this location and to consider alternative options.

**Flood Risk** - In flood risk terms the broad area for development in Scenario 2 is within flood zone 1 and flood risk is not a constraint on the delivery of c800 dwellings or more. There is an area to the east (outside of the growth area) adjacent to Hambrook within flood zone 2 and 3 but this does not affect the deliverability of this growth scenario. Within the wider scenario area there is limited surface water flooding which does not affect the delivery of c800 homes and there is only potential impact on site access options.

An FRA and drainage / SuDs strategy has been prepared for the Land at Cooks Lane site (within the wider allocation) which demonstrates the sustainable delivery of c100 homes in this location. Further technical work will need to be undertaken by the Council in relation to the potential location of a multi modal vehicular bridge and drainage strategy for this location.

**Landownerships** – We consider that a comprehensive and co-ordinated approach can be achieved to effectively realise the objectives of the emerging Southbourne Allocation DPD and Submission Local Plan. Elivia Homes is supportive of working closely with other landowners to ensure a comprehensive and co-ordinated approach to master planning and infrastructure delivery. Through the preparation of the IDP and CIL Business Plan there is scope to co-

ordinate proportionate financial contributions to key infrastructure required to support delivery of the wider allocation.

### **Growth Scenario Ranking:**

It is considered that this scenario should be ranked 2<sup>nd</sup> in order of sustainability and consistency with national and local policy. This scenario enables the delivery of c800 homes which are deliverable in relation to local constraints and infrastructure requirements. A comprehensive and co-ordinated approach to master planning and infrastructure delivery is also achievable in respect of landownerships.

This scenario is considered more sustainable to Scenario 1 'Land to the West' which is constrained in respect of landscape gap, gas pipeline, ecology and flood risk which raise uncertainty regarding c800 homes can be sustainable delivered.

### **Q6 - Are there any other benefits and challenges you feel should be included?**

**Accessibility to Services** - A further benefit of this scenario is accessibility to key services and facilities in Southbourne Village and also further afield via public transport links. This scenario is well related to the settlement edge of Southbourne and accessible within reasonable walking and cycling distances to services and facilities in Southbourne including supermarkets, health facilities and public transport services. From the Land at Cooks Lane, the nearest primary school is located within 250m and the nearest secondary school 750m to the west. The West Coastway Railway Line and Southbourne Train Station are located to the south-west, which is highly accessible by walking and cycling. The SA also identifies that Scenario 2 provides closer access to the railway station and employment opportunities further afield.

**Transport Impact** - In transport terms the SA identifies that scenario 2 performs most favourably as it utilises the existing multi-modal bridge and pedestrian crossing via Inlands Road and includes the provision of a pedestrian / cycle footbridge and new multi modal bridge. This should be recognised in the benefits.

**Ecology** - In ecology terms this option does not involve the loss of any land from the Brent Geese Support Area and this should be recognised as a benefit.

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

The draft DPD raises a potential challenge related an increase in traffic on Inlands Road Crossing if a multi-modal vehicular bridge is not delivered as part of this scenario. The potential impact will need to be explored with statutory providers including Network Rail and appropriate transport modelling will need to be undertaken by the Council in preparation of the DPD. It is uncertain at this stage what would be the impact of not delivering the bridge.

## **Scenario 3 – Mixed Scenario**

### **Q8 – Do you agree with the list of benefits and challenges?**

**Distribution of Development** - The balanced approach to the distribution of development in this scenario provides the option for further sustainable and proportionate growth in the future appropriate to the role and function of Southbourne as a settlement Hub in the Local Plan settlement hierarchy.

**Transport Impact** - This option is potentially more deliverable in transport terms when assessed against scenarios 1 and 2, as stated in the SA Report. This scenario is more readily accessible with the main access from Stein Road into land to the east and west. It also benefits from multiple points of potential vehicular and pedestrian / cycle access, as well as the opportunity to deliver a complete pedestrian / cycle route around the northern part of the village through the delivery of a green ring.

Distributing development on ‘suitable’ sites around Southbourne also reduces the potential need for a multi modal bridge. As stated in response to scenarios 1 and 2 the Council will need to engage with statutory consultees and undertake appropriate transport modelling to assess transport impact including in relation to Stein Road, Inlands Road crossings, Church footpath and Penny Lane footpath.

**Green Ring** – We agree it is important to identify the delivery of an almost complete Green Ring, as prioritised in the Southbourne Neighbourhood Plan, as another key benefit to this scenario. In this respect this scenario performs better than scenarios 1 and 2.

**Pedestrian Railway Footbridge** - Within Scenario 2 and 3 the Land at Cooks Lane provides the safeguarded land to enable the delivery of a new pedestrian and cycle footbridge over the railway line which is a key priority of the Southbourne Neighbourhood Plan. The footbridge is also a key element of the Green Ring that provides a safe and direct pedestrian and cycle link to the Primary School, railway station and Southbourne Village centre. The land to facilitate the crossing is within the control of Elivia Homes, as stated above. The railway crossing is deliverable and ongoing engagement is being undertaken with the Council and Network Rail regarding design and delivery of the bridge.

**Landscape Impact** - This scenario provides a balanced approach to the distribution of development around Southbourne which has less impact on National Landscapes and maintains the integrity of the settlement gaps to the east and west of Southbourne as identified in the Local Gap Assessment (CDC, 2019). The SA identifies that this scenario would have less impact in comparison to scenarios 1 and 2 on the National Landscape to the south.

Scenario 3 also locates development within areas that have greater capacity for change as identified in the Landscape Capacity Study for Chichester (2019).

**Education Provision** - The location of the new primary school in this scenario is the same as scenario 2 ‘Land to the East’ which enables a more balanced distribution of education provision in Southbourne Village, distributing traffic across the village and provides associated pedestrian, cycle connections and links to the Green Ring.

**Gas Pipeline** - In relation to the location of the gas pipeline consultation zone it is understood that this would not constrain the sustainable delivery of c800 dwellings within this scenario. There will be a requirement for the Council to engage with statutory consultees regarding land within the consultation zone and the delivery of the northern access point.

**Brent Geese** - This scenario would have an impact on the Brent Geese Secondary Support Area which will require mitigation but the impact is less than scenario 1 and it is understood that appropriate mitigation options have been identified.

**Flood risk** - In relation to flood risk and areas of surface water flooding, a balanced approach to locating development on the west and east of Southbourne enables development to be located in areas of lowest risk and provides greater certainty in delivering c800 dwellings.

**Landownerships** - In the context of landownerships, Elvia Homes considers that a comprehensive and co-ordinated approach can be achieved to effectively realise the objectives of the emerging Southbourne Allocation DPD and Submission Local Plan. Elvia Homes is supportive of working closely with other landowners to ensure a comprehensive and co-ordinated approach to masterplanning and infrastructure delivery. Through the preparation of the IDP and CIL Business Plan there is scope to co-ordinate proportionate financial contributions to key infrastructure required to support delivery of the wider allocation.

### **Growth Scenario Ranking**

It is considered that this scenario should be ranked 1st in order of sustainability and consistency with national and local policy. This scenario is considered more sustainable and deliverable in comparison to scenarios 1 and 2. This scenario provides a balanced and sustainable pattern of development which has the least impact in landscape terms and is likely to be more deliverable in respect of transport impact. This scenario also enables the delivery of almost complete Green Ring in accordance with the Southbourne Neighbourhood Plan. In this scenario there is scope for a coordinated approach between landownerships to ensure a comprehensive approach and delivery of key infrastructure.

### **Q9 – Are there any other benefits and challenges which should be included?**

**Housing Delivery** – This scenario is capable of providing for c800 dwellings or higher in view of the balanced distribution of development. This would provide sufficient flexibility to ensure the housing requirement to be met and also enable the potential for future growth proportionate to the role and function of Southbourne in the Local Plan settlement hierarchy.

**Transport Impact** - The SA identifies that Scenario 3 performs well in transport terms as it has multiple points of potential vehicular and pedestrian / cycle access, as well as the opportunity to deliver a complete pedestrian / cycle route around the northern part of the village through the delivery of a green ring. This should be recognised as a benefit.

**Flood Risk** - The SA identifies that Scenario 3 performs best in flood risk terms as it does not contain any areas of high risk or surface water or fluvial flooding which should be identified as a benefit.



**Railway Connectivity** - Options 3 (and 2) perform most favourably in relation to proximity to the railway station in comparison to Scenario 1 which should be identified as a benefit.

## **Southbourne Allocation DPD Appendix A: Assessment Framework**

### **Opportunities and Constraints**

#### **Q11- Do you agree with the list of opportunities and constraints set out above?**

It is appropriate to identify the opportunities and constraints as they affect the broad location for development for the three growth scenario options. The assessment framework should also identify the impact and significance of each constraint on each scenario and the degree to which they potentially impact delivering of the allocation. Responses to opportunities and constraints are set out below:

#### **Constraints**

**Power Lines** – It is appropriate to identify the power lines as a potential constraint and appropriate buffer distances will need to be applied. The impact of the pylons will be confirmed at the Reg 19 Stage of the DPD when a preferred growth scenario is confirmed. Depending on the preferred option and location of development mitigation options will need to be considered including buffer zones or realignment.

**Gas Pipeline** – The pipeline consultation area needs to be shown on the constraints map. Appropriate consultation will need to be undertaken by the Council with statutory consultees regarding the impact of the pipeline consultation area on site access and developable area.

**Heritage Assets** – A heritage statement has been prepared in relation to the Land at Cooks Lane to assess the impact on the setting of Thatchways and Loveders Farmhouse which can be shared with the Council. The statement concludes that the impact of development on Land at Cooks Lane on these heritage assets results in less than substantial harm in accordance with the NPPF and can be mitigated through appropriate masterplanning.

**Loss of Agricultural Land** – This is identified as a constraint for all 3 growth scenarios and is therefore not a deciding factor in determining a preferred option. The Chichester Submission Local Plan SA report states that there is no reasonable alternative strategy to deliver 535dpa including the designation of the BLD at Southbourne through Policy AL13 involving the loss of agricultural land. The DPD should identify that this not an overriding constraint that will affect bringing forward the DPD and determining a preferred growth scenario.

**Landscape** – The impact on views to Chichester Harbour National Landscape and the South Downs National Park is a key consideration. A Landscape and Visual Impact Assessment is being prepared for Land at Cooks Lane which can be shared with the Council.

**Strategic Wildlife Corridors** – These are proposed adjacent to the BLD so not a constraint on the delivery of the allocation for the three scenario options identified at this Regulation 18 stage.

**Brent Geese Support Area** – This is a key constraint to identify in relation to Scenario 1 ‘Land to the West’ which may impact on its deliverability.

**TPOs & Ancient Woodland** – These are key planning considerations but appropriate buffers to Ancient Woodland on the edge of the BLD are easily achieved and the extent of TPOs within developable areas is not a significant constraint to the delivery of the allocation. It is important to set this context in terms of the impact of this constraint on the growth scenarios.

**Flood Risk** – The areas within flood zones 2 and 3 on the eastern boundary to the BLD affect a relatively small area of land and through a sequential approach would not affect the delivery of the c800 within this scenario. There are some limited areas of surface water flooding to the north of the railway on the east and west of Southbourne which need to be considered but do not affect delivery of the allocation overall.

**Landscape Gap / Coalescence** – This is a constraint but primarily affects Scenario 1 ‘Land to the West’ as Scenarios 2 and 3 do not compromise the integrity of the local gap or result in coalescence. This context needs to be set out in the appraisal of the scenarios.

**Dispersed Location of Amenities** – We do not consider this to be a constraint but a consideration for the allocation master planning and provision / location of new amenities and facilities.

**‘Unsafe and Uncontrolled’ Rail Crossings and Western PROW** – This is a matter to address with statutory consultees / providers including Network Rail and the highways authority.

**Limited crossing points and highway capacity restrictions to existing level crossing at Stein Road** – The Council will need to undertake consultation with Network Rail and statutory providers / consultees alongside undertaking appropriate transport modelling to determine impact and appropriate mitigation measures.

**Noise and Air Quality** – Air quality is a consideration, but the BLD is not within an air quality management area so unlikely to be a significant constraint. Appropriate noise buffers need to be applied to development near the railway line in accordance with national guidance and noise and vibration assessments. A noise and vibration assessment has been undertaken for Land at Cooks Lane identifying appropriate buffers which can be shared with the Council.

**Walking and Cycling Connections** – Consider that this is more of an opportunity for enhancement of existing connections including delivery of the Green Ring.

**Landownerships** – All of the scenarios include multiple land ownerships. There is an opportunity to establish a co-ordinated approach in accordance with an overall masterplan and plan for infrastructure delivery secured through the IDP, proportionate financial contributions and CIL.

## **Opportunities**

**Improved Highways Infrastructure** – We agree there is an opportunity to deliver improved highways infrastructure and connectivity through a comprehensive master planned approach with proportionate financial contributions.

**Pedestrian and Cycle Footbridge** – The Land at Cooks Lane provides a key opportunity to deliver a new pedestrian and cycle footbridge to achieve the Southbourne Neighbourhood Plan policy objective.

**Green Ring** – There is an opportunity to deliver the Green Ring and ecological enhancements through all 3 scenarios. Scenario 3 provides the opportunity to deliver the entire Green Ring.

**Landscape and Ecology Designations** – There is an opportunity to provide access to nature but consideration should also be given to impact on sensitive habitats including Ancient Woodland.

**Provision of new amenities / facilities** – There is a significant opportunity for enhancement of existing amenities and facilities through proportionate financial contributions and CIL.

**Q12 – Are there any others which should be mentioned in relation to either category?**

## **Constraints**

**Ecology** – The SA Report identifies the impact of Scenario 1 ‘Land to the West’ on the Ems Water Body, which should be identified as a constraint.

**Highways, Access and Rail Crossings** – Impact on highways is a key consideration but there is a differing level of impact between the scenarios in relation to access options and safety / capacity considerations with railway crossings which needs to be reflected in the appraisal of the growth scenarios.

## **Opportunities**

**Housing Delivery** – Further consideration should be given to the ability to deliver c800 dwellings or above in all three scenarios. Scenarios should consider the ability to deliver more than 800 dwellings to provide sufficient flexibility and certainty that the Local Plan housing requirement will be met. This will take account of potential factors that may affect delivery to ensure that at least 800 dwellings are delivered.

**Balanced Development & Future Growth** – Consideration should be given to the distribution of development and how this enables future growth of Southbourne proportionate to the settlement and its position in the Local Plan settlement hierarchy. Scenario 3 ‘Mixed’ provides the best opportunity for future sustainable growth beyond the level of growth currently identified in the Submission Local Plan Policy A13.

**Accessibility to Amenities / Facilities** – In addition to the provision of new facilities there is the opportunity to enhance accessibility by sustainable modes of transport.

**Renewable Energy** – Further exploration should be undertaken regarding potential opportunities to deliver renewable energy infrastructure to serve the allocation and wider village of Southbourne.

### **Infrastructure Requirements**

**Q 13- Do you have any comments on the infrastructure requirements set out above, including how they could / should be most effectively delivered?**

It is understood that infrastructure requirements have been identified through the Submission Local Plan, Policy A13 and the Infrastructure Delivery Plan 2021 – 2039 (IDP) and Infrastructure Business Plan 2024 – 2029 (IBP). A response to the infrastructure requirements and delivery mechanism is set out below.

### **Transport**

**A27 Mitigation Contributions** – It is appropriate that mitigation for the A27 is identified, and contributions should be proportionate to the impact of sites within the wider allocation and in accordance with the adopted SPD.

**Multi Modal Crossings** - The potential requirement for new road level crossings will need to be determined through engagement with statutory providers and transport modelling undertaken by the Council. It is currently not clear what the impact of the allocation is without new multi-modal crossings. Any potential financial contributions must be proportionate and in accordance with the CIL tests. The alternative option of road level crossing improvements should also be assessed through the DPD involving engagement with statutory providers / consultees.

**Bus Service Improvements** – The provision of bus service improvements is a commercial decision by the bus operators and cannot be delivered by developers. Engagement with bus operators should be undertaken by the Council through preparation of the DPD to determine the potential for bus service improvements / bus routes.

**Pedestrian Rail Crossings** – A pedestrian rail crossing is deliverable on safeguarded land located to the east of Southbourne (within scenarios 2 and 3) on Land at Cooks Lane. Elivia Homes has undertaken engagement with Network Rail regarding delivery of the railway footbridge. As a result of these discussions, a railway footbridge is considered deliverable on land at Cooks Lane within the next 4 years. Furthermore, the costs of delivering the footbridge have been broadly agreed with Network Rail which will refine the costs provisionally identified in the emerging Southbourne Allocation DPD.

**Education** - Education infrastructure requirements have been identified through the Local Plan IDP in relation to wider population growth and the impact of growth associated through the Local Plan including the Southbourne Local Plan allocation Policy A13. The delivery of education infrastructure through the Southbourne DPD could identify proportionate financial contributions related to the impact of individual sites / land parcels within the wider allocation in accordance with the CIL tests.

**Health** - Health infrastructure requirements have been identified through the Local Plan IDP in relation to wider population growth and the impact of growth associated through the Local Plan including the Southbourne Local Plan allocation Policy A13. The delivery of health infrastructure through the Southbourne DPD will need to identify proportionate financial contributions related to the impact of individual sites / land parcels within the wider allocation in accordance with the CIL tests.

**Sports Facilities** – More details required on sports facilities requirements and playing pitch provision.

**Social / Community** - The identified requirements for a new community hall and library expansion will relate to the needs of Southbourne as a whole. The IDP will need to determine the impact of the allocation and to determine proportionate contributions related to the impact of individual sites / land parcels within the wider allocation in accordance with the CIL tests.

**Thornham WWTW Capacity** – Further clarity needed in the IDP regarding delivering sufficient capacity over the plan period to accommodate the allocation.

**Natural Environment** - In relation to nutrient neutrality a strategic approach should be identified through the Southbourne DPD whereby a mitigation strategy is identified which specifies a suitable scheme capable of delivering appropriate mitigation as part of a co-ordinated approach.

**Green Infrastructure** - In consultation with Southbourne Parish Council and in accordance with the Southbourne Neighbourhood Plan further work needs to be undertaken to clarify the detailed form of the Green Ring so this can be incorporated into master planning work.

**Gypsy and Traveller Pitches** - Submission Local Plan Policy A13 'Southbourne Broad Location for Development' identifies that the Southbourne BLD will provide 12 gypsy and traveller pitches in accordance with Policy H11 and a serviced site(s) to deliver 12 plots for travelling showpeople. The Southbourne DPD needs to establish a preferred location(s) for the provision of gypsy and traveller pitches and travelling showpeople plots that meets the needs of these groups in accordance with the local plan criteria policy and as part of a co-ordinated engagement exercise involving landowners within the BLD.

### **Infrastructure Delivery**

Informed by ongoing refinement of the IDP, the Southbourne Allocation DPD needs to establish a planning obligations framework which enables proportionate contributions to be made from individual sites / land parcels within the wider allocation. The role of CIL to contribute to infrastructure priorities in the BLD also needs to be clarified which also reflects how the Southbourne Parish CIL proportion is spent.

The role of statutory providers in delivering key infrastructure also needs to be identified including the role of Network Rail, Southern Water and the Highways Authority / National Highways. In terms of the impact of overall growth in the area statutory providers will need to be planning for the delivery of key infrastructure related to the impact of cumulative growth in the wider area.

## **Assessment Framework**

### **Q14 – Do you have any comments on the assessment methodology?**

An assessment framework has been prepared to appraise the 3 growth scenario options currently proposed at this Regulation 18 stage and comments are provided in relation to the proposed methodology below.

A Sustainability Appraisal has been undertaken for the proposed growth scenarios in accordance with the SA Framework established for the Submission Local Plan. The Southbourne DPD assessment methodology should be amended to clearly state that the assessment framework also includes the SA.

A response in relation to the proposed detailed DPD assessment criteria is set out below:

#### **1. Integrated, Well-Serviced Community**

It is appropriate for this criteria to identify the opportunity within the BLD to deliver new educational and community infrastructure including a community hub in accordance with the Local Plan IDP.

It is important to identify opportunities to deliver potential multi modal / pedestrian rail crossings. Land South of Cooks Lane provides the key opportunity to deliver a pedestrian footbridge to connect to the school, railway station, wider village.

It is appropriate to identify criteria related to achieving improved connectivity within the village for walking, cycling and vehicles.

Access to nature and open space including provision of the Green Ring is a key criteria. Land at Cooks Lane is able to deliver a key element of the eastern Green Ring including connectivity through provision of a pedestrian railway bridge.

#### **2. Housing for All**

To ensure that the Local Plan housing requirement is met the assessment criteria should assess the ability for growth scenarios to deliver in excess of c800 dwellings. This will provide sufficient flexibility to ensure at least 800 dwellings are delivered during the plan period taking account of any potential factors that may affect delivery within the allocation area.

The assessment should also consider the best distribution of development that supports longer term growth. For example, Scenario 3 'Mixed' approach provides a balanced approach to development that does not compromise the ability to sustainably accommodate further growth in the future above that identified in the Submission Local Plan.

The Southbourne DPD needs to establish a preferred location(s) for the provision of gypsy and traveller pitches and travelling showpeople plots that meets the needs of these groups in accordance with the local plan criteria policy and as part of a co-ordinated engagement exercise involving landowners within the BLD.

In terms of housing mix, all scenarios are capable of delivering a policy compliant mix and therefore this criteria does not assist in informing the identification of a preferred strategic option at this stage. The allocation policy will have reference to housing mix but this does not need to be included in the assessment criteria.

In relation to transport impact and ability to accommodate c800 homes, a full transport assessment will need to be undertaken by the Council in the preparation of the DPD.

### **3. Transport and Sustainable Travel**

The assessment criteria and objectives are similar to '1 Integrated, Well Serviced Community' and the framework could be updated to avoid duplication between the criteria. We support the identification of opportunities for active travel routes.

The opportunity to provide land to deliver pedestrian and cycle bridges across the railway in safe and convenient locations is a key criteria. Scenario 2 and 3 both include Land at Cooks Lane which provides land to enable the delivery of the railway footbridge as part of the Green Ring and enabling connectivity to the school and railway station.

The assessment criteria includes the ability to deliver multi modal rail crossings but the requirement for such crossings needs to be clarified through the Council's transport evidence and in consultation with statutory providers. The weight attached to this criteria is dependent on the need for the multi modal crossings in relation to the transport evidence.

Proximity to bus stops and frequent bus services is an important consideration of achieving sustainable development. However, the main issue will be for the Council to engage with the bus operators regarding bus routes and any potential for improvement in services.

Proximity and connectivity to the railway station and local facilities is a key criteria and scenarios 2 and 3 perform well in against this criteria.

### **4. Climate Change, Towards Net Zero Carbon Living**

The ability of each scenario to achieve the Future Homes Standard does not need to be within the assessment criteria to determine a preferred option at this stage. All scenarios are capable of being policy compliant and any further detail that expands upon the Submission Local Plan policy can be included in the Southbourne Allocation DPD policy at Regulation 19.

The criteria related to promoting short journeys, collocating uses and providing an appropriate mix of uses will be a key allocation policy requirement but is not needed at this stage to determine a preferred scenario option as all scenarios are capable of delivering the land use requirements.

### **5. Environment**

It is appropriate to include a criteria that relates to the delivery of the Green Ring but further detail is required in relation to the form that the Green Ring will take to deliver the objectives of the Southbourne Neighbourhood Plan (in addition to the 20m corridor criteria).

The criteria includes reference to preserving and enhancing the wildlife corridors identified in the Neighbourhood Plan. The wildlife corridors are an important consideration but the criteria is not needed as the location of built development in all scenarios is located outside the wildlife corridors where there is no significant impact.

Significant weight should be given to the opportunity to retain existing habitats, such as the Brent Geese Support area which is significantly affected by Scenario 1 Land to the West.

The assessment of flood risk impact needs to consider the ability to deliver c800 homes in flood zone 1 and within areas of low risk for surface water flooding. In scenarios 2 and 3 areas within future flood zones 2 and 3 are not required for residential development. The DPD will need to consider appropriate drainage strategies for the delivery of infrastructure in areas affected by surface water flooding.

The criteria related to the loss of BMV agricultural land should be removed as all 3 scenarios involve loss of BMV land and this criteria does not assist in differentiating the appraisal performance of each scenario. Furthermore, the Submission Local Plan has identified the priority to meet local housing need through the Southbourne Allocation and the loss of agricultural land has been accepted.

## **6. Character**

Landscape impact and views of the Chichester Harbour National Landscape and South Downs National Park as are key consideration. The draft DPD needs to clarify the approach to co-ordinating an allocation master plan and landscape strategy confirming technical work to be undertaken by the Council in the preparation of this DPD.

Landscape Gap is a key criteria for appraisal of the scenarios and is recognised that Scenario 2 'Land to the East' and Scenario 3 Mixed' perform best in this respect.

The criteria identifies the importance of development respecting Southbourne's settlement form, by maintaining the traditional village structure, ensuring that new development complement the scale and style of the existing properties. This is an important consideration for the allocation policy and determining the preferred high level scenario option.

### **Assessment Scoring:**

#### **Q15 – Do you have any comments on the site assessment scoring as set out above?**

##### **Reduce the barrier effect of rail tracks**

Scenarios 1 and 2 include the provision of a multi modal bridge but transport evidence has not yet been prepared to confirm whether it is required to the west or east. We consider that Scenario 3 should score 'strongly' by providing pedestrian / cycle rail crossings rather than making a 'reasonable / neutral contribution'.



## **Support delivery of improved connectivity within the village as a whole with good integration between new and existing community**

Scoring needs to be adjusted to take account of scenario 2 delivering a multi modal rail crossing and pedestrian footbridges which will improve connectivity. We consider scenario 2 scores higher in this respect.

## **Utilities pipeline impact onsite capacity**

From the appraisal it is considered that Scenario 1 'Land to the West' performs least well in terms of pushing development to the west into the landscape gap affecting the ability to sustainably deliver c800 dwellings and this should be reflected in the scoring i.e. makes a negative contribution. Scenario 2 performs better and should make a 'reasonable' contribution and Scenario 3 also a 'reasonable' contribution.

## **Site capacity to meet 800 homes delivery requirement**

It is considered that scenario 1 'Land to the west' performs least well and may not have capacity to sustainably deliver c800 homes. This is primarily in relation to impact on landscape gap, site access, connectivity, and ecological impacts. The rating for scenario 1 should be amended to 'poor'.

Scenario 2 Land to the East is currently assessed as 'poor' in relation to potential access constraints at South Lane and pressure on Inlands Road but this is uncertain and has not been demonstrated through the Council's transport evidence. This option also includes the provision of a multi modal bridge and pedestrian railway bridge so appraisal scoring should be changed to 'reasonable'.

Consider that scenario 3 performs best in terms of the ability to accommodate c800 dwellings and this should be reflected in the scoring which should be a 'strong' contribution This balanced distribution also provides better opportunity for further sustainable growth in the future over and above the Local Plan allocation.

## **Potential to deliver mix of housing types and tenures, including G&T provision**

We consider this criteria is not required as all options are capable of providing an appropriate mix including G&T provision. This is a policy requirement from Local Plan Policy A13, which can be reflected in the Southbourne allocation policy.

## **Potential to meet local housing need**

We consider this criteria is not required as all options are capable of providing an appropriate mix, including G&T provision. This is a policy requirement from the Submission Local Plan which can be reflected in the allocation policy and master planning.

### **Potential for a bridge crossing the railway for vehicles**

Scenario 2 land to the east should score ‘strongly’ as it includes the provision for a multi modal bridge. There are considerations for landowner collaboration, but this does not mean that this scenario scores ‘poorly’. Scenario 3 does not include a multi modal bridge but the significance of this will depend on the outputs of the Councils transport evidence as the DPD progresses.

### **Influence of vehicular bridge on traffic congestion**

Scenario 3 does not provide a new vehicular bridge but the impact of this is currently uncertain without transport evidence prepared by the Council.

### **Potential to create buildings to high environmental performance and meet Future Homes Standard**

This criteria is not required to differentiate performance of scenario options as all options capable of meeting this policy requirement of the Submission Local Plan, which can be reflected in the Southbourne Allocation DPD policy.

### **Preserve wildlife corridors**

This criteria not required to differentiate performance of scenarios as all options located outside of wildlife corridors with no impact.

### **Protect and / or mitigate existing wildlife and biodiversity**

We consider that scenario 3 performs ‘reasonably’ rather than ‘poorly’ with limited impact on the Brent Geese Support Area which can be mitigated.

### **Impacts to agricultural land**

The criteria related to the loss of BMV agricultural land should be removed as all 3 scenarios involve loss of BMV land and this criteria does not assist in differentiating the appraisal performance of each scenario. The Submission Local Plan has identified the priority to meet local housing need through the Southbourne Allocation BLD and the loss of agricultural land has been accepted.

### **Development location within Flood Zones**

Scenario 2 ‘Land to the East’ should score ‘reasonably’ rather than ‘poor’ as the majority of the site is within flood zone 1 and the location for development is identified outside of the flood zone. Also, as part of a sequential approach it should be possible to locate development in areas of low risk of surface water flooding.

Also, there is potential for a drainage strategy solution for delivery critical infrastructure (multi modal rail bridge). Delivery of the railway footbridge on Land South of Cooks Lane is not constrained by surface water flooding.

## **Retention of landscape gaps between villages/settlements**

Scenarios 2 and 3 should score ‘reasonably’ rather than ‘poorly’ as they do not affect the integrity of the landscape gaps or result in coalescence. Scenario 1 has the greatest impact on the hermitage landscape gap and should score ‘very poorly’.

## **Sympathetically to existing heritage features**

Scenarios 2 and 3 should have a ‘reasonable’ impact and not ‘poor’ as the existence of heritage assets within the broader allocation does not mean there will be harm to these heritage assets. Effective master planning provides the opportunity for new development to consider the setting of these heritage assets.

## **Deliverability Assessment**

### **Deliverability (land) Considerations**

Scenarios 2 and 3 include multiple landowners however, the Southbourne DPD can establish an appropriate framework to ensure a co-ordinated approach to masterplanning and the delivery of key infrastructure. An overall master plan framework can be prepared which enables separate land parcels to come forward without compromising the overall objectives of the DPD. An approach can be established which enables proportionate financial contributions to ensure the delivery of key infrastructure. Therefore, consider that scenarios 2 and 3 should score ‘reasonably’ for this criteria.

The appraisal for scenario 1 does not reflect that there is a significant parcel of land in a key position which is owned by a different landowner.

### **Deliverability (viability) Considerations**

The conclusions on viability at this stage have been drawn from high level assumptions contained in the Southbourne Allocation Development Plan Document Viability Assessment Stage 1 (2024), prepared on behalf of the Council by Dixon Searle. The viability performance of Scenario 2 ‘Land to the East’ is identified as poor, primarily in relation to the potential cost of a multi modal railway crossing. The viability report identifies that estimates regarding the cost of this crossing vary significantly and the actual cost will need to be confirmed through further work. Therefore, at this stage viability implications for scenario 2 should be identified as ‘reasonable’. Furthermore, subject to transport evidence and engagement with statutory providers there is potential for this scenario to be delivered without a multi modal rail crossing which will significantly impact the viability assessment.

The Dixon Searle viability report also identifies significant improvements to viability with the delivery of c1,050 dwellings as opposed to c800 dwellings. Subject to other considerations and constraints consideration should be given to delivering over 800 dwellings in relation to viability and ensuring that policy requirements can be met, and key infrastructure required to support the allocation can be delivered.

Overall, we support the preparation of the Southbourne Allocation DPD and the broad approach to identifying a preferred growth scenario to progress to the Regulation 19 stage. We welcome the opportunity to continue to work closely with the Council and other landowners in the preparation of the DPD as it progresses to Regulation 19 stage including involvement in preparation of the evidence base.

Please do not hesitate to contact me if you have any queries.

Yours sincerely

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