

HALLAM LAND

Southbourne allocation DPD

Response to the Regulation 18 consultation

December 2024



PLANNING
LIMITED

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1 Introduction

- 1.1 These representations to the Southbourne Allocation Development Plan Document Regulation 18 consultation have been prepared on behalf of Hallam Land (Hallam).
- 1.2 Hallam has previously made Representations in response to both the Local Plan Review and the Southbourne Neighbourhood Plan Review. Hallam were represented at both the recent Local Plan hearing session concern A13 and previously the Neighbourhood Plan examination.
- 1.3 Hallam control the land north of Gosden Green and west of Alfrey Close which is identified as a potential development location in the current consultation. As will be shown, the Hallam land should be included as an allocation in the Southbourne DPD regardless of which overarching scenario is taken forward, such are its locational merits and the absence of any genuine physical or environmental constraints.
- 1.4 On this occasion, our representations consider the following:
 - Section 2: Planning policy context
 - Section 3: The consultation documents options
 - Section 4: The merits of the land north of Gosden Green

2 Planning policy context

- 2.5 Southbourne is an identified settlement in the both the adopted Local Plan and the emerging Local Plan suitable to accommodate new housing development and associated uses. The Southbourne Allocation DPD is being prepared within the context of and to accord with the emerging Local Plan, which, at the time of writing is subject to its examination. The emerging Local Plan is therefore highly germane.
- 2.6 The emerging Local Plan's **spatial strategy** is described at paragraph 3.5 to 3.28 of the submission version. Of particular note is the recognition in paragraph 3.6 that the spatial strategy needs to account for the urban and rural nature of the District and that, to an extent, a dispersed pattern of growth is necessary to *"help sustain, enhance and make the area's city, towns and villages more self-supporting places to live and work"*.
- 2.7 Within this context, a logical driver is the importance of *"locating development in areas which are well located to other uses, serviced by a choice of transport modes and accessible to the communities they serve"*. This is a cornerstone of the NPPF and its objective to promote sustainable patterns of growth (§109 refers).
- 2.8 The practical effect of this is that that **Policy S1** intends that new development is concentrated in an east-west corridor in the south of the District (criterion 1 refers). Representations to the emerging Local Plan supported this approach, which, as a matter of principle, is soundly based.
- 2.9 Associated with this, **Policy S2** establishes the settlement hierarchy. Chichester is the pre-eminent settlement in the District and the greatest amount of new development has been directed to edges of this historic city over successive plans. The extent to which Chichester can continue to grow is limited by environmental and physical and infrastructure constraints.
- 2.10 Alongside Chichester, **settlement hubs** are identified at East Wittering / Bracklesham, Selsey, **Southbourne** and Tangmere. Map 3.1 identifies that East Wittering and Selsey relate to the Manhood Peninsula, whilst Southbourne and Tangmere are nodes at either end of the east-west corridor. Settlements Hubs are defined as secondary service centres providing *"a reasonable range of employment, retail, social and community facilities serving the settlement and local catchment areas."*
- 2.11 Alongside the emerging Local Plan, **Background Paper 11** reveals the comparative performance of these four settlements. It is notable that Southbourne is the only one of the four settlements that has all of the facilities assessed. It is one of two settlements with a secondary school and is the only settlement with a train service. These are materially important characteristics in the context of locating new development close to services and facilities as is the intention of the spatial strategy as evident at paragraph 3.6.
- 2.12 Having regard to the first of the emerging Local Plan's **strategic objectives** – to mitigate and adapt to climate change - Southbourne is an accessible location where new development would benefit from access to public transport with less of a reliance on the private car. Where travel is a major contributor to such emissions, this is self-evidently important.
- 2.13 The above are plainly relevant to the Allocations DPD; it is an especially important DPD as it is relied upon to deliver a significant element of future housing to meet the District's identified needs – broadly a third of the residual requirement necessary by 2039 are to be provided at Southbourne. In determining where new development should be provided, the DPD must provide certainty of deliverability and a contribution to sustainable patterns of development.

3 The consultation document's options

- 3.1 The consultation document proposes three options as to how the required amount of new development can be provided. It focuses on a spatial distribution – land to the west, land to the east and land to the north, which purports to be a mixed scenario.
- 3.2 It is instructive that the consultation document is based on meeting an identified need of 1000 new homes. Allowing for commitments, this refers to a residual requirement of approximately 800 new homes.
- 3.3 Of course, the selection of a location for new development should consider the most effective use during the plan period and beyond and is not necessarily bound by a single figure. This is especially the case where the emerging Local Plan has adopted a constrained approach to housing provision based on infrastructure capacity and Policy H1 is expressed as a minimum requirement for the District in any event. This is underscored by the fact that the District's housing requirement is expected to increase under the terms of the proposed revisions to the NPPF's *standard method*.
- 3.4 In other words, if an option exists that provides for more than the residual requirement adopting this would represent a positive approach to planning.
- 3.5 In the following paragraphs we discuss the various options in the consultation document.

Scenario 1: Land to the west

- 3.6 **We support this option.** On the basis of the consultation document's analysis and that in the Assessment Framework, it plainly offers the greatest advantages that outweigh the limited genuine environmental or physical constraints.
- 3.7 This scenario includes land south and north of the railway line and would deliver a substantial part of the green ring and importantly consolidate community facilities and address Church Crossing.
- 3.8 It is especially important that this option completes the development opportunity west of Alfrey Close; this strengthens and takes advantage of the connectivity that can be achieved with the existing urban area and towards the train station to contribute to active and sustainable modes of travel.
- 3.9 As the consultation document acknowledges, the benefits and advantages of Scenario 1 comprise the following:
- a community hub enabling shared education and leisure facilities;
 - good connectivity to pedestrian and cycle routes via the Green Ring and into the existing settlement;
 - the potential to address the existing pedestrian rail crossing using the rights and safeguarded land already secured;
 - delivery of the western portion of the Green Ring that will integrate biodiversity, nature, wildlife and arboricultural resources;
 - development that can be facilitated by a small number of landowners – The Church Commissioners and Hallam Land. (The suggestion that there are multiple landowners to the south of the railway line is not accurate; the land shown on the associated map is controlled by Hallam Land)

- 3.10 In respect of challenges, none of these are considered constraints that preclude development of Scenario 1 and whilst they might have a bearing on the mitigation measures necessary to support development north of the railway line, they do not constrain development to the south.
- 3.11 The gas pipeline appears to influence each of the scenarios and is not therefore a distinguishing factor.
- 3.12 The need for an additional vehicular crossing is equally a feature in each scenario and again is not a distinguishing factor; it is instructive however to compare how access is referred to between the scenarios: for the first scenario the term “*largely dependent*” is used, whereas for the second scenario it is expressed differently: [there is] “*a strong reliance on a vehicular bridge being provided over the railway line which is challenged by land not being safeguard for access*”.
- 3.13 Indeed, the Assessment Framework indicates that the land where a new bridge could be provided is subject to a planning application for housing development that specifically does not make such provision; this illuminates the intentions of those developers and the extent of genuine co-operation that exists (page 39 refers).
- 3.14 Mitigation for the overwintering and breeding birds will require a material increase in the functionality of the remaining area west of the proposed development that increases its utility. Significantly, this only relates to land north of the railway line.
- 3.15 Whilst the previous *Landscape Gap Study* identified the contribution of land around Southbourne to preventing coalescence with nearby settlement it is important to place that in the context that existed at that time. Plainly, with the emerging Local Plan now proposing a strategic development area at Southbourne the relevance of that study is more muted in that expansion of the settlement will occur and this will have an effect on the landscape around the settlement and this may result in new development being closer to existing settlements. To the west of Southbourne the assessment affords a potential gap function to land between the existing settlement and Hermitage.
- 3.16 Hallam has made submissions in relation to this previously, most notably its submission to the District Council of August 2022 which include a specific Technical Note in response to this. It is unquestionably the case that new development can both be accommodated on the Hallam land whilst also maintaining the separate identity of Hermitage. Whilst this would bring new development closer to Tuppenny Lane that would not have an effect on the character and identity of Hermitage. The character and identity of Hermitage is defined by core areas of housing and not the caravan park that comprises its eastern environs. Significantly this analysis has been adopted in the consultation document which retains a green corridor between new development and Tuppenny Lane.
- 3.17 In this regard it is of note that the District Council has resolved to grant planning permission for development north of the Caravan Park within an area identified by the gap assessment as having a potential function in maintaining separation. Clearly, the notion of such a designation is not inviolable.
- 3.18 The quality of agricultural land is a characteristic across the District as a whole. It is widely understood that to achieve the sustainable pattern of development that the spatial strategy is predicated on will involve development of best and most versatile agricultural land. This is not a distinguishing feature between the three scenarios.
- 3.19 Surface water flood risk is evident around the settlement; this appears to be largely in the form of ponding on the north side of the railway. This does not appear to be a distinguishing factor between the scenario 1 and 2, although the Assessment Framework refers to future tidal flood risk affecting land east of the settlement which affects the vehicular route proposed. Undoubtedly this is a more significant constraint.

- 3.20 None of the above challenges represent absolute constraints to development west of Southbourne as promoted in the first scenario. For the most part they give rise to masterplanning considerations rather than factors that preclude development.
- 3.21 What is evident is that the development opportunity south of the railway is eminently suitable whichever scenario is taken forward. It provides a discrete development opportunity, free of significant constraints that can be easily assimilated with the existing settlement pattern via the recent development at Gosden Green and Alfrey Close.

Scenario 2: land to the East

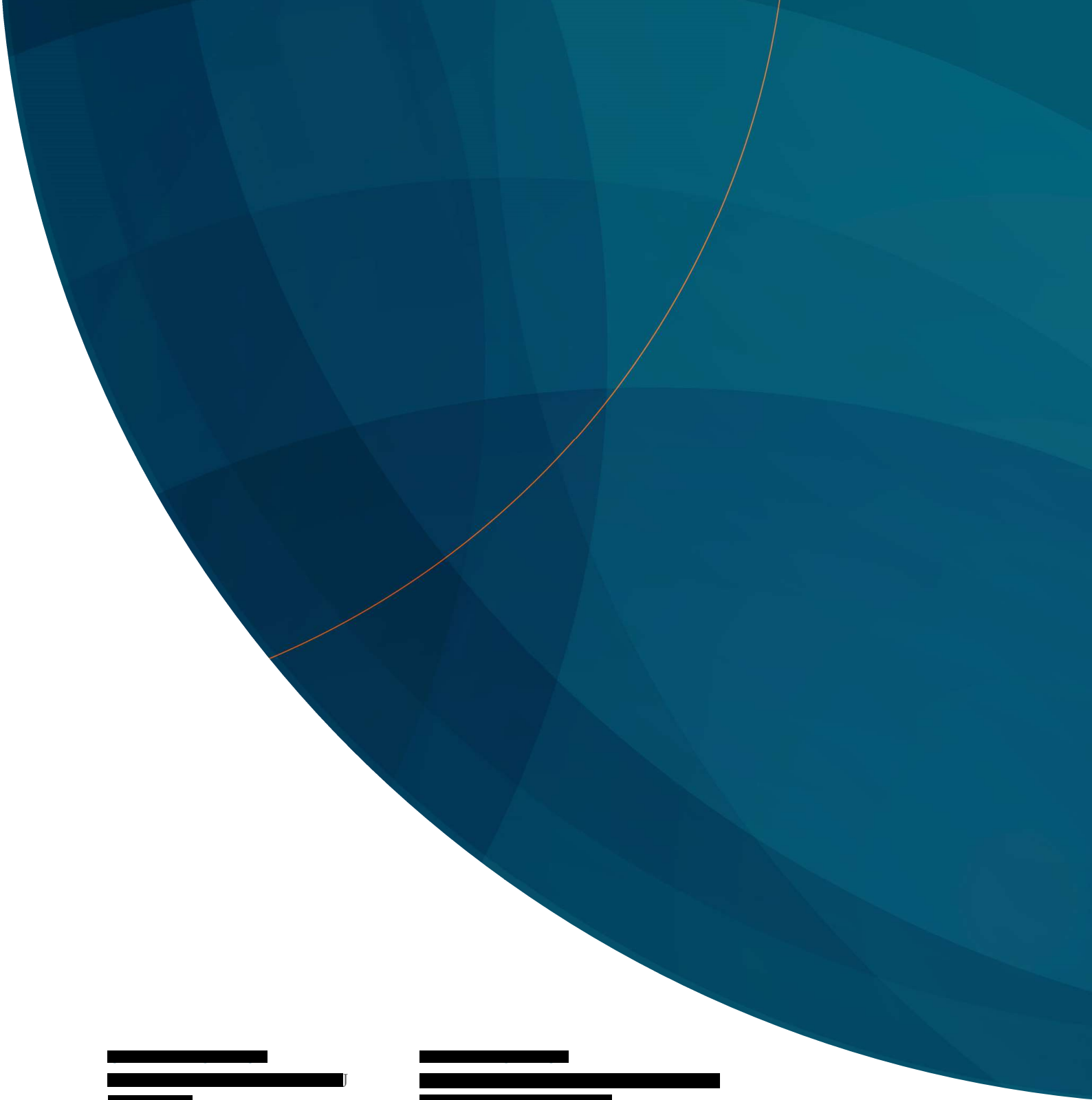
- 3.22 Having considered the benefits of scenario 1, none of the benefits associated with scenario 2 appear overwhelmingly more important. Whilst there is the notion that a multi-modal bridge could be provided, there are acknowledged challenges to this, including landownership and flood risk. This uncertainty and the evident risk to deliverability is a clear disbenefit of the second scenario.

Scenario 3: Mixed scenario

- 3.23 Again, having considered the benefits of scenario 1, none of the benefits associated with scenario 3 appear overwhelmingly more important. It is instructive that the absence of a new railway crossing appears to create additional traffic congestion which is a clear disbenefit of the third scenario. Moreover, the extent to compensate for the loss of brent geese habitat does not appear to be catered for with an absence of green infrastructure in comparison with scenario 1.

4 Conclusions

- 4.24 These representations have been prepared on behalf of Hallam Land Management Limited.
- 4.25 Hallam control the land north of Gosden Green and west of Alfrey Close that is identified as a potential development location in the first scenario - land to the west of the settlement.
- 4.26 This scenario has a great many benefits. None of the challenges represent absolute constraints to development west of Southbourne. For the most part they give rise to masterplanning considerations rather than factors that preclude development. **For all of these reasons set out here and in the consultation material, scenario 1 should form the basis of the DPD.**
- 4.27 What is also evident is that the development opportunity south of the railway is eminently suitable whichever scenario is taken forward. It is conveniently located to key services and facilities including the railway station. Development here does not give rise to significant environmental considerations other than separation with Hermitage which can readily be avoided. Nor are there physical constraints and development here does not require a new road crossing of the railway line. It provides a discrete development opportunity that can be easily assimilated with the existing settlement pattern via the recent development at Gosden Green and Alfrey Close.
- 4.28 In the event that, for some reason, either scenario 2 or 3 are preferred, that does not preclude the Hallam land from being a part of that strategy. **The Hallam land should feature regardless.**



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