Examination of the Chichester Local Plan 2021 - 2039

Matter 6 – Area Policies and Allocations
Policy A13 Southbourne Broad Location for Development

Respondent 6219: Mrs Sue Talbot LLB, MRTPI (Retired)

Q.241 What is the justification for the proposed 1,050 dwellings, local employment opportunities and supporting community facilities and uses at the proposed broad location for development?

Q.244 Would the requirements to be addressed in the allocation of the site as set out in the Policy be effective in achieving sustainable development on the site?

Q.243 Would the establishment of the site extent and boundary through a future Development Plan Document or a revised Southbourne Neighbourhood Plan be effective?

- This statement provides up-dated evidence confirming why further "piecemeal development" should not be permitted in Southbourne. Accordingly, the Council's "Interim Position Statement for Housing Development Nov. 2020" (IPSH)) should be withdrawn in respect of Southbourne.
- 359 dwellings were permitted in accordance with the first Neighbourhood Plan. Since then, a further 460 dwellings have been permitted (East of Breach Ave. 34, Cooks Lane 199, Four Acres 40, Harris' Scrap Yard 103, and Penny Lane 84). None of these have provided the type of community infrastructure which is so badly needed in a parish of some 6400 people (2021 Census), for example a new community centre, recreational open space (the existing sole recreation ground provides one football pitch), and alternatives for crossing the railway line.

Table 1 – Housing Development within Southbourne, including first Southbourne Neighbourhood Plan 2015

Location	Status	No. of Dwellings	Comments
Neighbourhood Plan 1 (2015)			
Parham Place	Allocated site - built	20	Not in BLD
Priors Orchard	Allocated site -built	159	Not in BLD
The Paddocks	Allocated site - built	55	Not in BLD
Southbourne Fields	Allocated site - built	125	Not in BLD
		Total 359	
Unallocated sites			
East of Breach Ave.	Appeal allowed - built	34	In BLD
Cooks Lane	Appeal allowed – u/c	199	In BLD
Harris' Scrap Yard	Permitted	103	In BLD
Four Acres	Permitted	40	In BLD
Penny Lane	Permitted	84	In BLD
		Total 460	
Windfall sites			
Priors Orchard	Permitted	9	Not in BLD
Wayside	Permitted	8	Not in BLD
South Lane	Permitted	8	In BLD
Sussex Brewery	Permitted	1	Not in BLD
		Total 26	
	OVERALL TOTAL	845	
In Pipepline			
Willowbrook	At appeal	63	Not in BLD
North of Tuppenny Barn	EIA pending	110	In BLD
Oaks Farm	App submitted - pending	49	In BLD
South of Cooks Lane	Pre- app	84	In BLD
		Total 306	
	OVERALL TOTAL	1151	
BLD		Total 823	

- The new Local Plan 2021 2039 Proposed Submission and the BLD (Southbourne Broad Location for Development Background Paper CDC May 2024 Ref. BP12) currently propose a further 1050 dwellings during the Local Plan period. The District Council has calculated that since January 2023, and not counting windfall sites, 227 dwellings were granted within the BLD area (Housing Supply Background Paper CDC July 2024 Ref. BP07 para.3.23 and table page 14). This Background Paper states that the 1050 figure has now been reduced to a total of **823** dwellings. The Local Plan and the BLD documents do not refer to this revised number and this is confusing. They should be amended to include it, explaining how it has been calculated.
- There were shortfalls in infrastructure in 2015 which need to be made good. Since then Southbourne has accommodated an additional **845** new dwellings in the last 10 years without any significant new community facilities. It doesn't make any difference whether new development is within the BLD or not, all of this development has brought new residents who rely on the existing inadequate facilities whether they live within the BLD area or outside it. Some **306** further dwellings appear to be "in the pipeline" (south of Cooks Lane 84, Oaks Farm 49, north of Tuppenny barn 110, and South of Cooks Lane 84), and if these were all to be granted the total increases to some **1151** dwellings. If a further 823 dwellings (BLD) are added to the 845 already committed, the resulting total is **1668.** This amount of growth without accompanying infrastructure is simply not sustainable development. Consultations on the Neighbourhood Plans have shown that, on the whole, the local community appears not to be opposed to new development in principle provided there is proper provision for local housing need and the lack of infrastructure is made good.
- There is a shortfall in the Council's 5 year land supply, currently at 4.19 years in April 2023 (CDC Local Plan Area 5 Year Housing Land Supply 2023 2028 Ref. CD07). This shortfall triggers the application of the CDC IPSH, which in nearly every case ends up supporting the grant of permission because the Council considers that the IPSH criteria are met.
- The designation of the BLD confirms in principle the suitability of Southbourne for development, but when combined with the shortfall in the 5 year supply and the IPSH, the parish will continue to be seriously vulnerable to exactly the type of "piecemeal development" that Local Plan policy A13 is seeking to prevent. If this continues during the period up to the adoption of the Local Plan, and then further on until the adoption of a DPD in summer/autumn 2027 (which might be an optimistic date in view of Chichester's record) there will be little left with which to masterplan. Reality is fast overtaking the wish list set out in A13.
- The BLD boundary encloses an area of land more than sufficient in size to accommodate a further 823 dwellings in Southbourne, community facilities, and buffer zones within the periphery of the BLD which are required to maintain substantial gaps looking towards both Hermitage and Hambrook The issue is not the quantity of land, but whether such large numbers can be integrated into Southbourne. Landowners and developers within the BLD will need to be made co-operate with each other in some way; this failed when the second Neighbourhood Plan was reaching its final stages and developers in the "consortium" broke ranks.
- The Local Plan must be clear that the Southbourne Settlement Boundary is being replaced by the BLD and Policy A13. Otherwise, the combination of a Settlement Boundary and the IPSH will lead to further permissions being granted within the BLD irrespective of BLD policies.
- The Southbourne BLD is the only BLD in this Local Plan and its designation arose from exceptional circumstances when the second Neighbourhood Plan was withdrawn, not because the Neighbourhood Plan failed to provide sufficient housing but because it got ahead of the Local Plan 2021 2039 Proposed Submission. This should be recognised. While the IPSH is only Supplementary Planning Guidance, it has played a powerful role in granting permissions, and it conflicts with A13. If Southbourne is to have any chance of properly planned development, the IPSH should be precluded from playing any role in Southbourne and this should be made clear in the Local Plan. This could at least help prevent "piecemeal" development after adoption of the Local Plan enabling the proper planning of the BLD.

ST/6 Sept. 2024

NB I have asked for the Council's "Interim Position Statement on Housing Development" 2020 to be included in the Examination Library as I was unable to find it in the list. It is on the District Council website.