

Local Plan Examination Matter 6

Hallam Land

September 2024

INTRODUCTION

1. Our response to Matter 6 has been prepared on behalf of Hallam Land, who has submitted representations at successive stage of the emerging Local Plan including the Regulation 19 plan.
2. On this occasion, our hearing statement concerns Policy 13A and the Southbourne Policy Area. The overarching issue is whether the proposed policies and allocations are justified, effective and consistent with national policy?
3. In response to Matter 3 we have discussed the spatial strategy and settlement hierarchy as it relates to Southbourne and do not repeat that. Suffice to say, given the role and function of Southbourne and its demonstrable public transport accessibility, it is in our opinion justifiably a Settlement Hub.

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?

4. BP12 is a background paper concerning specifically the proposed Broad Location at Southbourne.
5. The notion of a strategic growth area at Southbourne originates from the early stage of the plan making process and stems both from its suitability as a location for new development as a node in the east-west corridor as a matter of principle, and the limitations on growth elsewhere in the corridor. The scale and components of this growth area emanate from large scale land promotions located either east or west of the settlement. Viewed through the lens of simply land availability, BP12 explains that a larger scale of development could be accommodated at Southbourne.
6. The Southbourne Neighbourhood Plan Group sought to take forward that early-stage notion and attempted to crystallise a location for that development and its components. Absent a strategic policy in an adopted Plan to this effect, this Neighbourhood Plan was found not to meet the necessary basic conditions.
7. Policy A13 is therefore the culmination of work over a period of time to determine the suitability of Southbourne as a broad location for growth. Critically the submission version of the Local Plan does not in fact define that location east or west of the settlement but rather around the settlement as a whole; in other words east and west. Appendix 2 of BP12 illustrates this. This is a fair reflect of the fact that there are development opportunities in both directions and there is no single direction or location for growth.

Q.242 Is there clear evidence that the site would not be developable in terms of the NPPF?

8. The submission version of the Local Plan has not alighted upon a direction of growth and thus there is no site *per se*. This is explained in BP12 in the following terms:

“The work carried out by the council to date on Southbourne has been based on the principle of it being a suitable location for strategic scale development rather than considering the comparative suitability of specific sites to deliver that development. Whilst some technical work was available for the preparation of the Southbourne Neighbourhood Plan review, this was not at a sufficiently detailed or consistent basis across all potential sites to justify the making of a local plan allocation.” (emphasis added)

9. There are plainly competing interests as to how and where this scale of development is best met and that simply has not been resolved as part of this Local Plan process.
10. Whilst there are major landowner interests to the west and to the east there are other complementary development opportunities regardless of an overall direction of growth. For example, HSB0022a – land east of Tuppenny Barn Lane - is assessed as developable by the HELAA (Appendix 1 of BL12 refers). The conclusions of the HELAA are reproduced below:

Suitability: The site is potentially suitable subject to detailed consideration on matters including landscape impact. The promoter’s estimate of yield includes consideration of landscape gaps with approximately half the gross site area envisaged for open space and structural planting.

Availability: Submitted previously in 2016, 2018 and 2019, the site is under single ownership with no known legal constraints and has the involvement of a developer with the promotion of the land.

Achievability: The site is not currently being marketed, and could expect to be developed within five years.

Deliverability/Developability: The site has been assessed as deliverable, within the early part of the plan period.

Yield: 110 (years 1 – 5 70 dwellings; years 6-10 40 dwellings).

11. It benefits from being south of the railway line and thus not constrained by any need to improve the existing crossing. This an opportunity that the site is considered to has potential to make a valuable contribution to local housing supply, as well as providing further benefits green infrastructure and connectivity benefits whilst contributing proportionately to social infrastructure as necessary.
12. Initially the District Council had intentionally left this to the Neighbourhood Plan but more recently, because of the importance of bringing forward new development at Southbourne, it has seized itself of the opportunity to prepare a Development Plan Document. This is referenced in BP12 and the July 2023 Local Development Scheme. The District Council believe this can be prepared and adopted in some three years, which is not unreasonable given its relatively narrow focus.
13. This inevitably protracts the period before which there is a plan led direction of growth in comparison to a firm allocation at the present time. However short term and small-scale opportunities for new development exist to counteract this delay, notably a number of planning permissions and other developable opportunities exist in this regard.

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?

14. Yes, it would. It is common-place for what are in effect “part two” plans to take forward strategic policies and define specific allocations. Bearing in mind the scale of the task, we agree that this responsibility best sits with the Local Planning Authority

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?

15. In the context of a Development Plan Document being prepared to this effect, yes they would.
16. Policy A13 intends that the Development Plan Document establishes "*the site extent, definition of the boundary, including any amendments to the Southbourne settlement boundary, and detailed guidance for the development within this broad location*". This is a clear and unequivocal instruction.
17. The "*detailed guidance*" will of necessity provide a greater level of specificity to the broad criteria listed in A13 presently relative to the location of growth proposed.
18. Together, this would then enable a judgement to be formed as to whether any subsequent planning applications satisfactory meet the requirements and achieve sustainable development.