

Neighbourhood Planning,
Chichester District Council,
East Pallant House,
1 East Pallant,
Chichester
PO19 1TY

Date: 3rd June 2021
Our ref: 19743370v4
Your ref:

Dear Sir/Madam,

Response to the Southbourne Neighbourhood Plan (Submission Plan – Regulation 16): Submission made on behalf of the Church Commissioners for England

We write in response to the Southbourne Neighbourhood Plan (Submission Version) consultation on behalf of our client, the Church Commissioners for England (CCE). Our submission relates to CCE's landholdings to the north and west of Southbourne.

Following the Regulation 14 consultation on the draft Southbourne Neighbourhood Plan, we are aware that the CCE land has not been allocated as the preferred development area within the submission version of the Neighbourhood Plan. This is disappointing from CCE's perspective. We would like to reaffirm our position that the CCE's site represents the best option for meeting the future development needs for Southbourne as it fully meets the Parish Council's objectives for the proposed site allocation, can be accessed easily and, importantly, will deliver significant local benefit. It is therefore requested that the CCE site be kept under consideration.

Nevertheless, should the land to the east be taken forward in the Neighbourhood Plan, CCE suggest that their land holdings to the east of Stein Road should also be included within the allocation in order to help improve access into the preferred allocation site.

Background

The CCE land in Southbourne comprises 69.3ha and, since 2016, has been promoted as a suitable site for a housing-led development, incorporating significant opportunities including a primary school and extensive areas of open space. A Vision Document has previously been prepared and presented to Southbourne Parish Council which included a detailed analysis of the site and its surroundings, and responds to the examination of various technical matters including landscape and visual appraisal, air quality and noise, flood and drainage, ecology, transport, utilities and character. Importantly, there are no technical impediments that would prevent development from coming forward on this site.

Chichester District Council's emerging local plan policy (AL13) proposes the allocation of at least 1,250 new homes at Southbourne with an average density of 30 dwellings per hectare. This includes the consented scheme for 199 dwellings on the western side of the proposed allocation on Land North of Cooks Lane

(SB/18/03145/OUT granted on appeal APP/L3815/W/17/3173380). The remaining development will therefore be for approximately 1,050 dwellings.

To deliver the scale of development, with associated infrastructure, set out in the Local Plan the Parish Council considered growth options to the west of Southbourne (Option B) and to the east of Southbourne (Option C). The publication of the Draft Neighbourhood Plan has demonstrated that the Parish Council has allocated Option C, Land to the east of Southbourne (Policy SB2). The Commissioners consider that the site to the west, could better meet the Parish Council's objectives for new development.

As part of the Regulation 14 consultation, which took place in October 2020, representations were submitted by Lichfields on behalf of CCE which suggested that the access arrangements for the proposed allocation have not been fully tested and requested that the CCE land is kept under consideration, particularly the land parcel east of Stein Road. The representations also noted CCE's position in relation to objecting to the isolated Local Green Space designation on the site, in the absence of a wider proposal for the land.

Within the Consultation Statement (February 2021) (Appendix 2 page 127) our comments in relation to the Local Green space have been considered and it concludes that the designation should remain. However, our previous representations in relation to the site allocation and access do not appear to have been given consideration by the Parish in the publication of the Submission Version of the Neighbourhood Plan and would therefore reaffirm the position in relation to these matters.

Land to the East – Site Allocation

It is recognised that the Parish Council sought to consult extensively on its Plan. The Submission Version of the Neighbourhood Plan notes that 226 questionnaires were received from residents, of which 51% voted in favour of the land to the east being allocated. It is noted that this was an important consideration for the Parish Council when determining which allocation should be in the Neighbourhood Plan. However, as noted in the Plan, at the time of the last census (2011), there were 6,265 people living in the Parish. Therefore, only 4% of the village's population provided a view on the Plan's allocations, with only 2% voting for the land to the east. Whilst fully respecting the process that the Parish Council has conducted and the weight that they have placed on community feedback, we would question whether this consultation is reflective of the wider Southbourne community. Therefore, the weight afforded to the public consultation in determining the best site for Southbourne should be re-considered.

Access

The site allocation plan on page 76 of the Neighbourhood Plan does not include the access arrangements for the land to the east of Southbourne. Neither does Southbourne Masterplan document (appendix B of the Neighbourhood Plan), with only key pedestrian/cycle routes illustrated on the supporting images/plans. However, the supporting text suggests one of the key vehicle access points into the allocated site to be provided via South Lane to provide a connection on to Stein Lane. South Lane is narrow, without footways and has a 90-degree bend with poor forward visibility. As such it is not considered suitable to facilitate primary access for any significant number of vehicle movements.

CCE maintain the position there is a better and more straightforward connection on to the existing highway network to be provided from their landholdings to the west of Stein Road. However, should land to the east of Southbourne be taken forward, it is also considered that part of the CCE land to the east of Stein Road should also be included within the allocation to help deliver a more appropriate access route for the allocation. The CCE land would enable a fit for purpose connection and junction with Stein Road. Stein Road would then provide an alternative connection to the A259 which would reduce the pressure on the existing / proposed junction with the A259.

CCE land as an Alternative Allocation

The CCE site presents the opportunity to provide a comprehensive development that would contain significant areas of green infrastructure and open space in a sustainable location. The CCE site also meets the requirements of Chichester Local Plan Policy AL13 and would provide a wide range of opportunities and benefits that the Parish Council are seeking.

Significantly, the CCE land offers a preferable access arrangement for Southbourne. It proposes the main access into the site from Stein Road, from two proposed new junctions located to the north of the existing settlement. Whilst both sites require a new vehicular bridge over the railway to provide a connection to the A259 Main Road, the CCE proposed connection would tie into the access routes already approved for land to the south of the railway. This connection is deliverable and would assist in reliving congestion at the level crossing.

The Vision Document for the CCE land shows how the scheme would provide the following to meet all of the Parish Council's requirements for the allocation:

- 1 **New Housing**- how the site could deliver a variety of housing types and sizes and providing affordable housing would be of benefit to the village.
- 2 **Sustainable development**- the development would have good access to existing facilities in the village such as the Tesco Metro, the railway station, schools, leisure facilities, library, village hall, bus services as well as being able to provide a range of new amenities on the site itself, such as a new primary school, doctors surgery or retail provision.
- 3 **Open Space**- Provision of extensive areas of new public open space, which could be developed as a landscaped park, as part of the 'Green Ring'. This would provide a beneficial new asset for the village, offer an alternative to Chichester Harbour for dog walking, and incorporate sustainable urban drainage systems and tree planting. The development would also provide the opportunity to create a positive interface with the landscape where development parcels front green infrastructure.
- 4 **Access** - The proposed access for the CCE site has significant advantages in terms of minimising traffic impacts on to Stein Road by avoiding either the need for traffic from the new development to be routed through the existing settlement when it is heading north or a connection via unsuitable roads i.e. South Lane. Together both the north and south access points avoid the need for traffic from the new development to unduly add to congestion along Stein Road.
- 5 **Delivery** - the site can be brought forward early in the plan period, without the need for costly infrastructure and utilising the existing road network.
- 6 **Integration** - the proposed development would have a well-considered relationship with Southbourne, creating a well-planned link between the new and old communities.
- 7 **Green Ring** - The eastern parcel is surrounded by a mature hedgerow on its western, southern and eastern edges with buffer planting to the A27 along its northern edge, creating a mature, well-established green structure. There is the potential to create additional green buffers, as part of the 'Green Ring', particularly in the western parcel, with the opportunity for additional tree planting around future development parcels. This would provide an improved green settlement edge to preserve and enhance the separation of settlements and visually enclose the development.

The Chichester Local Plan Review

As part of the current review, it is understood that CDC is considering evidence as to whether there is a requirement to increase the housing requirement to address any unmet need from neighbouring authorities.

As a consequence, it is possible that the 1,250 housing requirement for Southbourne could increase further prior to the Local Plan being adopted. Should this be confirmed, it may be necessary for the Neighbourhood Plan to allocate additional land for housing and, in such circumstances, the use of the CCE land should be reconsidered. The standard method figure for Chichester is 759 dpa using the April 2021 update. Even if the housing requirement does not increase in the current Local Plan review, it is likely that the Council will need additional land for housing in the future. It may be necessary to allocate additional housing within Southbourne.

Local Green Space 7

The Local Green Space designation on the CCE site has been included in the Draft Neighbourhood Plan despite the written representation submitted on 5th August 2020 and 8th October 2020.

As part of the evidence base for the Submission Version of the Plan a Local Green Spaces document (February 2021) was published which includes the Parish Council's response to the representations:

“Whether or not the surrounding land is allocated for development is not relevant. The land being privately owned is not relevant. The fact that the trees are TPO'd is not sufficient to protect this important landmark which is highly visible from a number of frequently used public footpaths. The Green Infrastructure Network Map in the SPNP Submission Plan shows the position of the proposed Green Ring passing close to this group of trees, which in due course is intended to provide a landmark along the route. While this is a long term aim, it is important that steps are taken now to protect this feature. This proposed site is not only about the trees. The location, within the former United States Army Air Service aerodrome, and the historical connection to this, is of particular importance to the community.”

The LGS designation would involve 33 beech trees which are set in the middle of an arable farmland field and are all covered by a Tree Protection Order (TPO).

The CCE fully appreciate the local significance and importance of the identified trees, but remain of the view that as they are already covered by a TPO, due to their amenity and value, there can be no merit in having the additional LGS protection which, is unnecessary in these circumstances. The NPPF (2019) includes reference to LGS and the requirements for designating land and how it should be managed. Paragraph 99 states that “the designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them.” However, in this case, it should be recognised that these trees are already protected by the TPOs and therefore do not require a further designation for protection.

Paragraph 99 also notes that “designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services”. It is not considered that this would apply in this case, if the surrounding land is not allocated for development and remains as open fields and will therefore be protected by existing countryside policies.

Further, paragraph 101 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts. Such an approach would be wholly inappropriate for this small group of trees in an isolated location where the application of Green Belt policy would be irrational, given that there is no other Green Belt or relationship with other LGS in this area.

CCE Land at Southbourne

To summarise, CCE consider that their land site is the most appropriate and sustainable location for a natural extension to Southbourne. The Vision Document provides a detailed analysis of the site and

surroundings and the background technical work on heritage, landscape, ecology, transport, character which has been carried out on behalf of CCE. This technical review of the site concludes there are no technical impediments to development.

The site is wholly within CCE's ownership, is available now and as demonstrated by the Vision Document, is a suitable site for development. The site could accommodate approximately 1,250 homes which could be delivered on a phased basis early in the plan period. There are no overriding physical or technical constraints that would act as an impediment to development. There is also a clear access arrangement proposed, which provides access for traffic going north onto Stein Lane, without routing it through the existing settlement. We consider this is a significant advantage over the allocated site which should be given further consideration before the Neighbourhood Plan is finalised.

However, should land to the east of Southbourne be taken forward, it is also considered that part of the CCE land to the east of Stein Road should also be included within the allocation to help deliver a more appropriate access route. This would also help facilitate the continuation of the 'green ring' through to Stein road, improving its accessibility for the community and making an improved 'gateway' to the new development.

Overall, the Submission Version of the Neighbourhood Plan requires further work prior to examination by an Inspector. This principally should involve review of the proposed sites access options and re-consultation with residents.

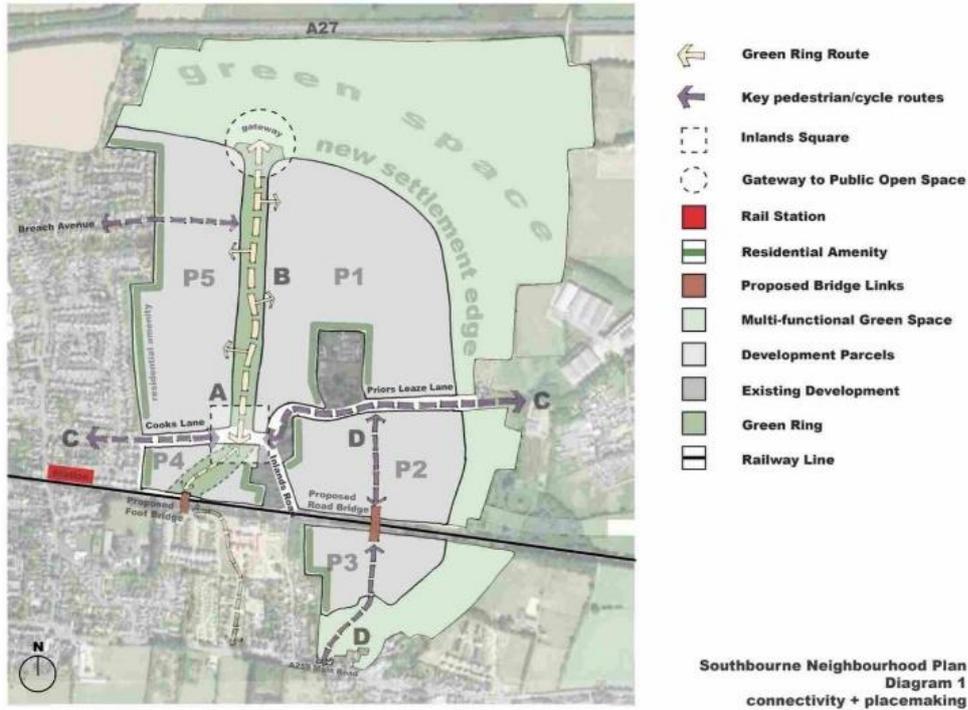
Should you have any questions regarding this submission or wish to meet to discuss the opportunity presented by CCE's land, please do not hesitate to contact me or my colleague Clare Catherall.

Yours sincerely

Tara Johnston

Planner

Annex 1: Site Allocation Connectivity and Placemaking Diagram



Source: Submission Version Southbourne Neighbourhood Plan 2021