

Planning Policy  
Chichester District Council  
East Pallant House  
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Chichester  
West Sussex  
PO19 1TY

**Date:** 29 May 2025

**Our ref:** 14733/04/PR/806D607A321C04/33829980v1

Dear Sir/Madam

## **Chichester Local Plan Main Modifications Consultation: Response on behalf of the Church Commissioners for England**

We write in response to the above consultation on behalf of our client, the Church Commissioners for England ('the Commissioners'). The Commissioners is a large land owner in the area largely to the south, west and east of Chichester.

We welcome the opportunity to further engage with the Local Plan process. Whilst we support some aspects of the Local Plan, we consider that some changes to the proposed Main Modifications (MM) are necessary to ensure that the Plan can be found sound.

By way of background, the Commissioners has been promoting several sites which could assist the Council in delivering much needed housing for the district. We respond to the Main Modifications consultation primarily in relation to the Commissioners' land to the west of Southbourne, which is identified as the 'Scenario 1' option for development in the draft Southbourne Allocation DPD. Representations were submitted in relation to the DPD's Regulation 18 consultation in December 2024 supporting Scenario 1 as the most suitable, feasible and deliverable option for the future development of a thriving and sustainable community in Southbourne. We comment on the Proposed Main Modifications that are relevant to shape the future development of the DPD, to ensure that it can be positively and effectively prepared.

We also take the opportunity to comment on the proposed Main Modifications in relation to horticultural development. CCE has significant landholdings which could assist the Council in addressing the insufficient availability of horticultural land.

The structure of this response follows the order of the Main Modifications Schedule. We integrate our comments on the accompanying Sustainability Appraisal Addendum prepared by AECOM (March 2025). As per the format of the Main Modifications Schedule, we show proposed ~~deletions~~ as strikethrough text and **additions** as bold text with underlining.

## MM6 – Chapter 3: Spatial Strategy, Policy S1 Spatial Development Strategy

Proposed MM6 includes the addition of an additional sentence at the end of Policy S1 Spatial Development Strategy in relation to the delivery of the housing target. The MM deletes the approach of ‘flexibly applying the distribution of development’ to ensure that the council delivers its housing target. The additional sentence states “**Additional housing allocations, if required, will be made through the Site Allocation DPD (or review of the Local Plan)**”. We comment further in relation to this point and the Sustainability Appraisal Addendum below.

## MM31 – Chapter 5: Housing, Policy H1 Meeting Housing Needs

Proposed MM31 is for the replacement of all Policy H1 text, including the deletion of the housing target being ‘to provide for at least 10,350 dwellings to be delivered in the period 2021-2029’ and replacement with the **‘housing requirement for the plan area is to provide for at least 11,484 dwellings (638 dwellings per annum in the period 2021/22 – 2038/39 stepped as follows: 575 dpa for the years 2021/22 to 2029/30, 701 dpa for the years 2030/31 to 2038/39)’**.

The proposed MM adds a new table to Policy H1 ‘Table XX Housing Supply’ detailing how housing requirement will be met. After allowing for 2,326 completions since April 2021 and 5,257 commitments (planning permissions, allocations) at 31 January 2025, the table identifies “**a residual requirement for 3,901 dwellings which will be met through new strategic site allocations, windfall sites and subsequent development plan documents**” including the Southbourne DPD, “**sites allocated through neighbourhood plans or a future Site Allocation DPD**” and “**sites allocated through the Site Allocation DPD or a review of the Local Plan (whichever is sooner)**.” Policy H2 Strategic Locations/Allocations 2021-2039 (MM32) continues to allocate the Southbourne Allocation DPD for 10,050 dwellings. We note that the allocation is unchanged, despite the overall increase in the housing target from 10,350 dwellings to 11,484 dwellings.

The accompanying Sustainability Appraisal Addendum (SAA) concludes “*The key consideration is the proposal to increase the housing requirement without identifying specific new supply (at this stage; i.e. specific new supply will be identified through a subsequent Site Allocations DPD or a new Local Plan) and in the context of an adjusted approach to A27 mitigation.*” The Commissioners supports the recognition of the lack of an identified specific new supply of housing as being a key issue, particularly in light of the increased overall housing requirement, and consider that must be addressed in order for the Plan to be found sound.

The Commissioners consider that there is scope to increase the quantum of development/new dwellings allocated for the Southbourne BLD. As per our previous representations to the regulation 19 Local Plan consultation (March 2023) and regulation 18 Southbourne Allocation DPD consultation (December 2024), it is considered that the Commissioners’ land west of Southbourne could accommodate circa 1,200 homes. The Vision Document for the Site (which has previously been shared with the Council) evidences this, and has been informed by detailed technical work. Given the ample provision of approximately 31ha of open space identified as being deliverable in the Vision Document (significantly above the minimum of 25.5ha identified as deliverable in the DPD), the concept masterplan remains balanced and able to deliver the necessary infrastructure alongside c.1,200 dwellings in a high-quality development. Therefore, leaving the identification of a specific new supply to a subsequent Site

Allocations DPD (it is not clear when preparation of this DPD will begin) is not considered to be an appropriate, justifiable strategy when considering that the Commissioners' land at Southbourne provides one such available evidenced-based option to contribute to a specific, measurable new supply (1,200 homes).

The SAA conclusion continues to state that *"A secondary issue is then the proposal to delete text quantifying the extent to which the spatial strategy is focused on the southern plan area. These proposed changes are supported from a perspective of supporting 'homes' objectives but give rise to a modest degree of tension in wider respects, most notably in terms of 'transport' objectives. This serves to highlight the importance of ongoing monitoring and work to monitor and manage transport impacts"*. The Commissioners considers that this issue further compounds the need to identify a more specific supply of housing at this stage. The Commissioners and Pell Frischmann are aware of and are supporting the ongoing technical work in relation to the A27 and the delivery of a multimodal bridge to allow for the full delivery of strategic development at Southbourne and understand that this will need to be carefully addressed and managed, including as part of any future planning applications for this site. The transport technical work that has been undertaken to date has informed the development of the Vision Document and has indicated that Scenario 1 has potential to deliver c.1,200 homes, subject to the delivery of a multimodal bridge, which has been confirmed to be technically feasible.

## **MM77 – Chapter 10: Strategic and Area Based Policies, Policy A13 Southbourne Broad Location for Development**

Proposed MM77 updates the Policy text for A13, to clarify that **"Policy H2 identifies a Broad Location for Development at Southbourne for 1,050 dwellings. Excluding sites over 5 dwellings within Southbourne parish which were permitted between 1 April 2021 and 31 January 2025 (which take the total for Southbourne BLD to 1,050 dwellings), the requirements of Policy H2 will be met by land being allocated through the Southbourne Allocation DPD for approximately 800 dwellings, local employment opportunities and supporting community uses and facilities, to be masterplanned as a whole"**. As set out above, the Commissioners Vision Document for the Scenario 1 Option comprising its land to the west of Southbourne shows a concept masterplan that can deliver 1,200 dwellings alongside local employment opportunities and supporting communities and social infrastructure in a high-quality green and biodiverse setting.

We note that MM77 amends Paragraph 10.56, to state that development will need to address additional issues, including linking to the National Cycle Network Route 2 along the A259. This can be accommodated as part of the extensive network of active travel infrastructure integrated throughout the concept masterplan. Development will also need to take into account relevant West Sussex Minerals and Waste Policy and Safeguarding Guidance. The Commissioners does not consider that this will be an insurmountable issue and agree that this MM is necessary to ensure that the Plan is sound.

MM77 seeks to make changes to the requirements for development within the broad location. Our previous representations and the Vision Document have evidenced that development of Scenario 1 will facilitate the achievement of biodiversity net gain and create high levels of habitat connectivity within the site. The wider green infrastructure network and identified strategic wildlife corridors through the Green Ring concept masterplan approach, will provide a unique and responsive landscape framework

for the Site (amended requirement 9). We are aware that any impacts on the Chichester Harbour SPA/SAC/Ramsar site will need to be mitigated (amended requirement 10). Ongoing technical work is also being undertaken to ensure that the severance caused by the railway line is addressed (requirement 5).

However, the Commissioners are concerned that amended requirement 1, to provide ~~16~~ **53** serviced self/custom build plots, is not justified. This is a significant uplift in the requirement that has not been sufficiently evidenced or explained. The Commissioners do not consider that this significant uplift reflects MM36 to Policy H6. Policy H6 states that new sites over 200 units which are allocated in the Local Plan will be required to provide self and custom build serviced plots at set out in the relevant site-specific allocation policies. The MM amends the policy to state that **“In the event that any housing sites come forward for development that are strategic in scale (over 200 residential units), and that are not allocated in this Plan, in all other instances a 5% of market units provided on strategic scale housing sites should be self/custom build”**. The significant uplift in the requirement from 16 to 53 at this late stage in Plan preparation, and the disparity between the requirement for allocated and unallocated strategic scale sites, are reflective of an inconsistent approach to the provision of serviced self/custom build plots. This raises questions as to how this approach has been evidenced and justified, and the Commissioners therefore do not consider the approach to be sound. The approach needs to be robustly evidenced and justified given that it will equate to a large number of serviced self/custom build plots on larger sites.

## **Chapter 7: Employment and Economy – Policy E3 Addressing Horticultural Needs and Policy E4 Horticultural Development**

The Commissioners has significant landholdings that are suitable for horticultural development. MM59 adds an additional paragraph after paragraph 7.29 and amends the Policy E4 text to allow for **‘functionally-linked’** development to come forward alongside horticultural development, to ensure that the Policy assists the national and international competitiveness of the district’s horticultural industry. The SAA confirms that the MM58 and MM59 have modest overall implications, and serve to provide greater clarity for the horticultural industry regarding what types of development will be supported within HDAs. The Commissioners are supportive of this approach and continue to welcome the opportunity for continued dialogue on supporting the delivery of horticultural development at additional locations to those already identified.

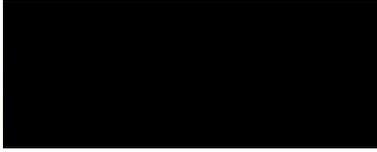
### **Summary**

The Commissioners have welcomed the opportunity to engage with the Local Plan process and are supportive of the Local Plan aspirations. However, the changes set out above in relation to the quantum of development that can be delivered on the Commissioner’s land to the west of Southbourne and the site-specific requirements for the Southbourne Allocation DPD are recommended to ensure the Plan is sound, and to allow for the ongoing effective preparation of the DPD.

Should you have any questions regarding this submission, please do not hesitate to contact me or my colleagues Sally Furminger or Amy Jones.

**LICHFIELDS**

Yours faithfully



**Pauline Roberts**

Senior Director

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