Chichester District Council

Issued by Email Only

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| 29th May 2025 | |
| Consultation on Main Modifications to the Chichester Local Plan 2021-2039 |
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To whom it may concern,

Thank you for the opportunity to respond to the above consultation.

SUEZ has been working with the adjacent landowners’ representatives, Obsidian (acting for DC Heaver and Eurequity Limited) since 2015 to promote draft site allocation A8. SUEZ has previously submitted representations in response to the Regulation 18 consultation in February 2018, the Regulation 19 consultation in March 2023 and submitted Hearing Statements to the Local Plan Examination in September 2024. We have summarised our most recent comments in Table 1. SUEZ has no further comments in response to the Main Modifications consultation.

As you’ll be aware, Obsidian have brought forward an outline planning application for residential-led development as Phase 1 of the A8 allocation (ref. 24/02401/OUTEIA) and SUEZ shall bring forward an application for our land holding, which forms Phase 2 of the A8 allocation.

**Table 1: *Summary of SUEZ representations***

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| **Policy Ref** | **Previous SUEZ comments** | **Main Modification** | **SUEZ response to the Main Modification** |
| Policy A8 | At Reg 19, SUEZ requested that the text includes the phrase, “*at least*” 680 dwellings. | The text now includes the phrase, “approximately” 680 dwellings. | No further comment. |
| Policy A8 | At Reg 19, SUEZ requested that the text at bullet point 11 (on transport contributions) includes the phrase, “*Should significant impacts on the local highway network be identified through assessment”* provide or fund mitigation for potential off-site traffic impacts through a package of measures in conformity with Policy T1 and T2. | The suggested text has not been adopted. | No further comment. |
| Policy A8 | At Reg 19, SUEZ suggested that the text at bullet point 6 (on the wildlife corridor) which required a “substantial and effective buffer with significant planting to the strategic wildlife corridor…”) lacked the certainty required by the NPPF. | The words “*substantial and effective*” have been replaced with, “*an appropriate buffer*..” | No further comment. |
| Policy A8 | No previous comments on point 12 made. | At point 12 (on providing sustainable travel linkages) the following settlements have been added: “*Westhampnett, Tangmere and Oving.”* | No comment. |
| Policy A8 | In our Hearing Reps, we noted the increase in the number of self-build plots which had increased from 10 (at Reg 19 stage) to 34 plots.  In our Hearing Reps, we stated that “*This significant change made after the Reg 19 consultation is not supported.”* | The 34 plots is retained as a main modification. | No further comment. |
| Policy I1 | At Reg 19, we suggested that the requirement at bullet point (v) “*To consider and meet as appropriate the in-perpetuity costs of infrastructure and arrangements for its future management and maintenance.” may not lie with the development.* | At point (v) the following text has now been added, “*The ongoing costs of infrastructure management and maintenance that is the responsibility of statutory providers and utility companies will continue to be met by those businesses.”* | No further comment. |
| Policy NE8 | At Reg 19, we suggested that the yellow highlighted words at bullet point 2 are deleted: “*Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient*  *woodland and trees; veteran trees; protected trees, groups of trees and woodland and hedgerows) should be refused unless there are wholly exceptional reasons and a suitable compensation strategy in accordance with relevant legislation, policy and guidelines;”* | These words have been deleted in the Main Modifications. | No further comment. |
| NE16 | At Reg 19, we suggested that the text on water quality and waste water at part (a) which requires, “*no adverse impact on the quality of water bodies*” would be amended to read, “*minimise adverse impacts…”* | No change to the original text. | No further comment. |

I trust the above is satisfactory, but should you require any clarifications, please do not hesitate to contact me.

Kind regards,

Emma Smyth

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Senior Planning Manager, MRTPI