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# **AL3 Land East of Chichester (Preferred Approach)**

## **Site Promotion Statement in response to consultation on the Chichester Preferred Approach consultation**

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Representation by Savills on behalf of SUEZ in relation to land east of Chichester

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## 1. Introduction

- 1.1. This representation is made on behalf of our client SUEZ Recycling and Recovery UK Ltd (SUEZ) in connection with land they own east of the A27 (formerly known as Drayton Manor), Chichester (hereafter referred to as 'the Site') to the current Preferred Approach to the Chichester Local Plan Review 2035. This statement provides information on the site, and seeks to justify why the site should be confirmed as a preferred allocation for housing and ancillary development in support of the Chichester Local Plan Review process.
- 1.2. The current Local Plan: Key Policies was adopted by Chichester District Council (CDC) in 2014. At examination the Government appointed inspector concluded that the Plan fell short of meeting the full housing needs of the area and required CDC to commit to review the Plan within the next 5 years.
- 1.3. The Local Plan Preferred Approach consultation document now presents Chichester's preferred approach to how they will shape future development in the district, excluding the area within the South Downs National Park, up to 2035. It includes the overall development strategy as well as relevant policies to meet the future needs of the area and development management policies to help guide development over the plan period. The Site is currently identified as Preferred Option AL3, forming the western part of a larger strategic site allocation, with land to the east owned by DC Heaver and Eurequity IC Ltd (with Obsidian Strategic AC Limited acting as their promotion partner), the subject of a separate response. Together the two landholdings total about 56ha, and will be hereafter referred to as 'Preferred Option AL3'. Preferred Option AL3 is fully supported by the two landowners, who are cooperating fully to deliver a comprehensive approach to development.
- 1.4. Our initial assessment has shown that the Site is exceptionally well located and well suited to assist with the delivery of the Council's housing requirement in a sustainable manner. The Site is suitable for residential/mixed use development, is available for development, and is deliverable in the Plan period, and so accords with paragraph 31 of the NPPF 2018 and PPG guidance. Further information will be assembled as the Site progresses through the Local Plan Review process and will be shared with the Council to help demonstrate that the Site is a sustainable option and deliverable within the Local Plan Review period in a phased manner.
- 1.5. We request that our responses are taken into account and we hope that they will assist the Council in its decision as the Review progresses, a process which is highly important in order to deliver Chichester's housing needs.

## 2. Background

- 2.1. The Site comprises the former Drayton Manor closed landfill site, located adjacent to the A27 to the east of the City of Chichester. It is in the freehold ownership of SUEZ, formerly known as SITA UK. The ownership boundary of SUEZ is shown on plan Ref: **Figure 1**, edged in red. The freehold boundary of Preferred Option AL3 directly abuts the public highway of Shopwyke Road and SUEZ have access rights through the approved Wellbeck appeal scheme to the north, and so SUEZ have control over the delivery of the Site.
- 2.2. The Site was put forward as a strategic development site as part of the Housing and Economic Land Availability Assessment in 2018, and to the Issues and Options consultation in August 2017. Ongoing liaison has also taken place with the adjoining land owners to adopt a collaborative approach, and with officers of Chichester District Council to share information.

### 3. The site and surrounding area

- 3.1. The site is located adjacent to the A27 Chichester by-pass, accessed off Shopwyke Road to the north and occupies an area of approximately 20 ha (47 acres). The site lies in the Parish of Oving, and borders the city of Chichester being adjacent to the A27 which forms the current settlement boundary.
- 3.2. The site lies at the heart of the East-West corridor, identified as key locations for the creation of new sustainable neighbourhoods with good public transport, pedestrian and cycle links to other parts of the city. We support the Council's view that strategic development to the east of the city can conserve and enhance the local distinctiveness, character and cohesion of existing settlements whilst recognising the important role of the City as the major focus of employment, shopping and leisure.
- 3.3. The site is believed to be a former sand and gravel quarry which was subsequently landfilled. The site was used as a landfill operation from September 1982 to October 1990 for mixed waste including that from households and is therefore regarded as a potential 'Brownfield' site according to the NPPF where Para 117 states 'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses in a way that makes as much use as possible of previously developed or 'brownfield' land.' Since landfilling ceased at Drayton Manor and the Site is not subject to any landfill licences or permits, the Site is now available for an alternative use.
- 3.4. The Site is visually connected to the Chichester City main settlement, lying adjacent to the A27, and is in close proximity to the Strategic Shopwyke mixed use development site currently being developed to the immediate north, and to other recently approved developments to the south.
- 3.5. The Site is clearly separated from the next nearest settlement, the village of Oving, located at least 1.5 km to the east. As a result there would not be an actual or perceived coalescence of existing settlements in developing this site.

#### Surrounding Development Context

- 3.6. Outline planning permission was granted in August 2017 for development to provide 100 dwellings on land at Oving Road adjoining the site to the north (HELAA 2018 reference HOV0004).
- 3.7. In addition, and directly to the south of the Drayton Manor site, a hybrid and full planning application under planning reference 14/04284/OUT for retail and employment development on the former Fuel Depot Site was approved on 6th July 2016 with s.106 requirements for pedestrian and cycling links to the town centre. Adjoining this land and also to the south of the Drayton Manor site an outline application under planning reference 18/01365/OUT is pending consideration for the redevelopment of the Springfield Site for B1/B2/B8 uses for up to 9240sqm of employment space (HELAA 2018 references HOV0009 and HOV0019).

- 3.8. In the wider area, the Strategic mixed use development site, Shopwyke Lakes is located to the east of the A27, to the north of the Site. It establishes a precedent for development adjoining the Chichester City Settlement Boundary, but separated from it by the A27, where the opportunity exists for the comprehensive planning of this entire area to the east of the A27 to enhance facilities, green infrastructure and transport networks for existing local communities, the City and the Plan area as a whole.

### **Sustainability and Accessibility**

- 3.9. The site is ideally located with respect to road and rail infrastructure. We are aware that Highways England (HE) previously consulted on options for the comprehensive improvement of the A27 and its associated junctions. Further work has also been considered in some detail by Chichester District Council, West Sussex County Council and local communities with a Council resolution to support a northern A27 improvement alignment as a preferred option in the event of a future opportunity to apply for central government funding. In the interim period, CDC propose to work with HE, WSSC and major development promoters to identify a coordinated package of transport measures to the junctions of the A27 to improve traffic capacity, congestion, queuing and safety. We fully endorse this collaboration and will work with CDC, HE and WSSC to consider improvement options for the A27 as part of the strategic development of site AL3.
- 3.10. The site is located within reach of the Stagecoach 55 bus route between Tangmere and Chichester Town Centre and the site also has excellent scope for improvements to pedestrian, cycle and new/improved public transport access with Chichester consequent of its location adjoining the current settlement boundary. The non-car improvements proposed at both Shopwyke and the former Fuel Depot development sites, secured through s.106, which will also be of benefit to the Drayton Manor site being directly north and south.
- 3.11. With respect to facilities; as part of a comprehensive redevelopment of this Site and those of adjoining land there is the opportunity to provide community facilities in accordance with the most up to date Infrastructure Delivery Plan. There are also schools, shops and community facilities located in the outer city area of Portfield, to the west of the A27, with larger supermarkets and retail stores being located directly off the A27 within close proximity of the site to the north and south. There are also numerous employment opportunities located within Chichester City and surrounding area with the larger settlements of Southampton, Portsmouth and Brighton being within a commutable distance.

### **Environmental**

- 3.12. The Site is not covered by any landscape, ecological or heritage designations of either European, National or local importance that could prejudice development of the site. There are also no landscape or ecological designations within 2km of the site, with just a handful of listed buildings located within 2km scattered around Chichester comprising residential properties that would not be adversely impacted by a development scheme of a mixed use nature. As far as SUEZ are aware, there are no protected species on the Site.
- 3.13. The site is also located in Environment Agency Flood Zone 1, the lowest and least constrained of the flood zone classifications.

## 4. The Vision for the Site

### 4.1. The Vision for the Site is as follows:

'Land east of Chichester can deliver a sustainable, sensitively designed neighbourhood, closely linked to the historic city. It can be a place with a variety of choices to live and opportunities for social interaction with biodiversity and recreational enhancements. It will be a welcoming place, with a strong sense of identity, and allow nature and landscape to form an integral part of the development.'

### 4.2. The Vision for land to the east of Chichester can be summarised as follows

- The opportunity to deliver up to 1,000 new homes on the wider development site;
- Mix of housing including affordable;
- Opportunity for new local facilities;
- Public Open Space;
- Improved footpath and cycle links;
- Access to high quality public transport;
- Biodiverse network of green infrastructure.

### 4.3. The Site could achieve the following key objectives:

- Early and consistent housing delivery throughout the Local Plan Review period;
- The creation of enhanced ecological habitats;
- Completion of the emerging community east of Chichester;
- Creating a positive identity to ensure the development responds well to the local landscape;
- Creating a viable and sustainable place;
- Creating a safe and walkable neighbourhood;
- Delivering best practice;
- Providing quality of life;
- Remediation of the former landfill site.
- Delivering sustainable development.

## 5. Chichester Preferred Options

### Housing Need

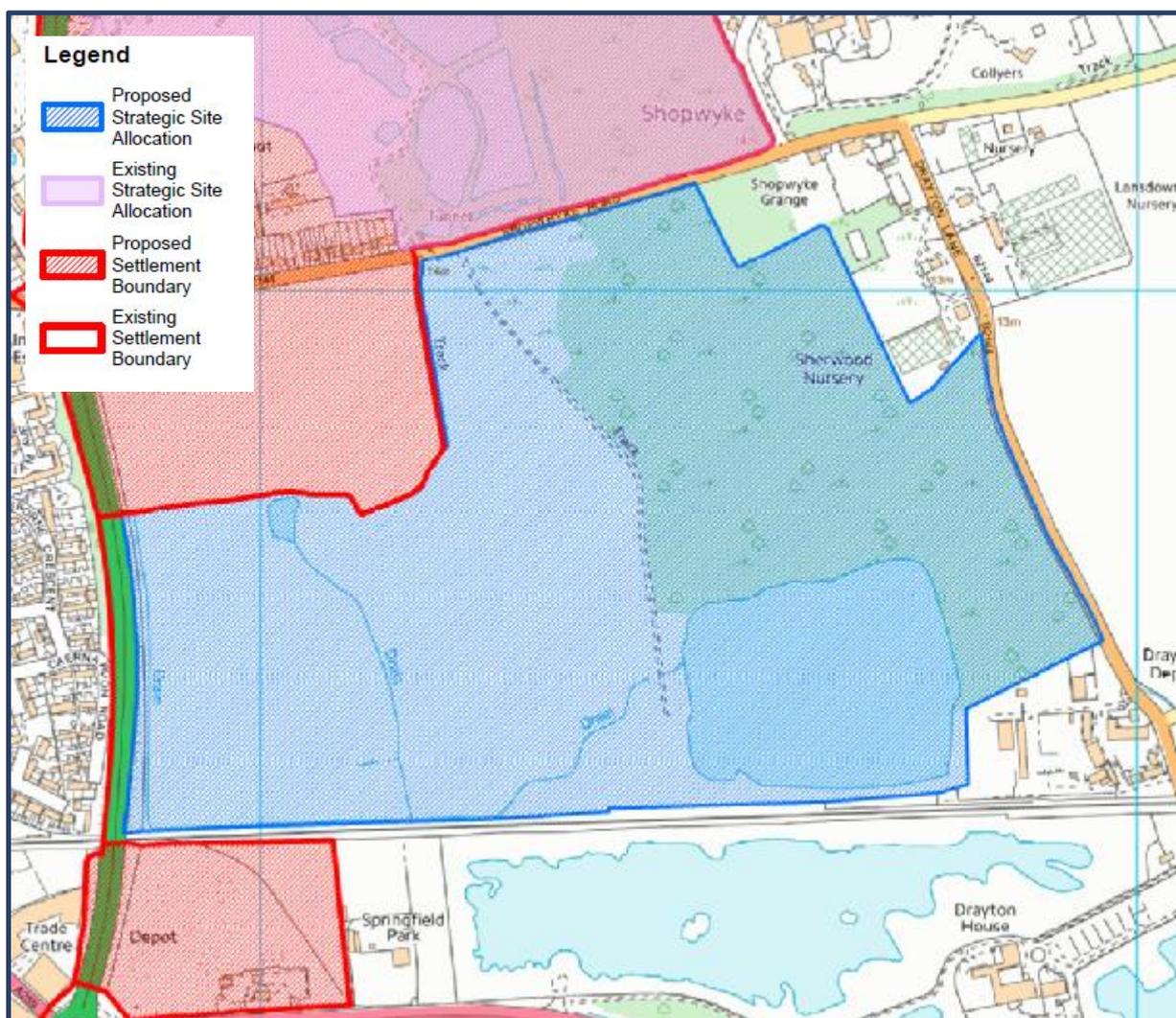
- 5.1. The updated NPPF (July 2008) requires local authorities to 'boost significantly' *the supply of housing by identifying and updating annually a supply of specific deliverable sites for years one to five of the plan period*. It states 'strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach, which also reflects current and future demographic trends and market signals' (para 60). Planning policies should 'identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability' (para 67). It is recognised that *'the supply of a large number of homes can often best be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns'* (para 72).
- 5.2. Plan-making authorities are advised to identify opportunities that can help meet identified needs in a sustainable way and they should consider the opportunities presented by existing or planned infrastructure, the area's economic potential and the scope for net environmental gains.
- 5.3. The Chichester Local Plan Review Preferred Options Consultation Document (December 2018) identifies there is a need for the plan to make provision for an additional 12,350 dwellings to be delivered during the period 2016-2035 in accordance with the findings of the Chichester Housing and Economic Development Needs Assessment (HEDNA).
- 5.4. Para 4.25 of the Preferred Options document states: *'In order to achieve the levels of housing supply required to meet identified needs, it is necessary to make provision for larger scale development in the plan area. In total the Plan provides for at least 4,400 dwellings to come forward from such sites.'*
- 5.5. The proposed allocation AL3 is strongly supported for the following reasons:
- Chichester District Council is unlikely to be able to accommodate its projected housing requirement without allocating land such as this;
  - Of all the sites identified as preferred options in the Local Plan Review, this is the most sustainably located with strong links to Chichester city centre and the services and facilities provided there;
  - The location and scale of the site would contribute to the achievement of sustainable development (NPPF para. 7 and 16) and would maximise the contribution the land could make to the Council's housing targets;
  - It falls within the Chichester East-West corridor, identified as a Spatial Vision within the adopted Chichester Local Plan and carried forward to the Chichester Local Plan Review 2035 Preferred Approach at Para 3.3 as a *'preferred location for developing key settlements, with a focus upon creating communities with good access to a range of existing employment opportunities and facilities'*. This site also offers the opportunity to complete the already emerging community to the east of the city;
  - Preferred Allocation AL3 is owned by only two land owning parties who are working collaboratively together to ensure that the allocated site is deliverable early and consistently throughout the plan period;

- The site can deliver a residential-led development of up to 1000 dwellings, including the provision of community facilities, to support the new sustainable community in a sustainable manner;
- As required by Policy AL3 a range of types, sizes and tenures of residential accommodation can be provided on the site.
- The southern part of the site is former landfill, although on the basis that landfilling ceased some time ago, it is economically efficient and suitable to develop this portion of the site for housing in the second half of the plan period. Further site investigation work will be undertaken to inform the phasing strategy for development.

## 6. Draft Chichester Local Plan 2035

### Policy AL3 – Land East of Chichester

- 6.1. Chichester District Council has identified the land owned by SUEZ and DC Heaver Eurequity IC Ltd (with Obsidian Strategic AC Limited acting as their promotion partner) for a new site allocation for a residential led development through draft Policy AL3. It is noted that together with the Shopwyke, Westhampnett/North East Chichester and Tangmere proposed allocations, which are located in relatively close proximity to Chichester City, these provide significant opportunities for strategic growth over the plan period. This position is strongly supported by SUEZ.
- 6.2. The Proposed boundary of allocation AL3 is shown below:



6.3. Draft Policy AL3 states:

*'Approximately 35 hectares of land at East of Chichester is allocated for a phased residential led development of a minimum of 600 dwellings, a neighbourhood centre/community hub (incorporating early years, primary school, local shops, a community centre and flexible space for employment/small scale leisure use) along with open space and green infrastructure.*

*Development in this location will be expected to address the following site-specific requirements:*

- 1. Provision of a high quality form of development to be masterplanned as a sustainable urban extension of Chichester City, that is well integrated with neighbouring areas on the east side of the city and to the north of the site, providing good access to the city centre and key facilities and to sustainable forms of transport;*
- 2. A range of types, sizes and tenures of residential accommodation to include specific provision to meet specialised housing needs including accommodation for older people;*
- 3. Existing ground conditions on the southern part of the site should be investigated;*
- 4. Provision of suitable access points from Shopwyke Road and contributions to off-site highways improvements, which will include promoting sustainable transport options;*
- 5. Provision of on-site public open space and play areas in accordance with Policy DM34;*
- 6. Provision of appropriate landscaping and screening to minimise the impact of development;*
- 7. Opportunities for the provision of appropriate landscaping and screening to minimise the impact of development;*
- 8. Existing views of Chichester Cathedral spire are to be protected;*
- 9. Provision of infrastructure and community facilities in accordance with the most up to date Infrastructure Delivery Plan.*
- 10. Be planned with special regard to the need to mitigate potential impacts on the Chichester Harbour SAC/SPA/RAMSAR including contributing to any strategic access management issues, and potential for loss of functionally linked supporting habitat.*

*Proposals will need to demonstrate that sufficient capacity will be available within the sewer network, including waste water treatment works, to accommodate the proposed development in accordance with policy S31.*

*Development proposals should address the provisions of West Sussex Minerals Plan, and associated guidance, in relation to the site being within a defined Minerals Safeguarding Area.'*

## SUEZ Response

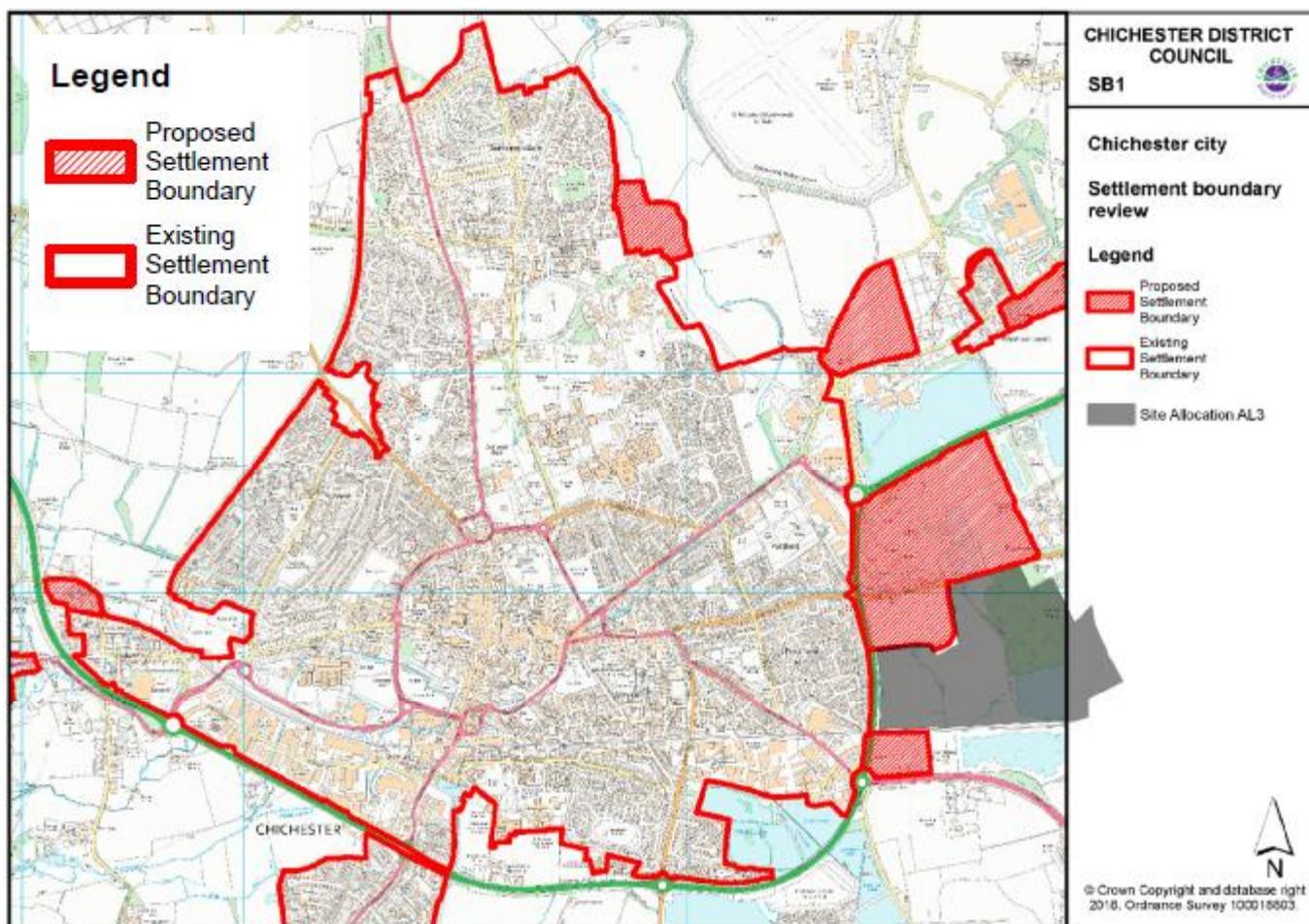
6.4. Whilst SUEZ strongly support draft Policy AL3, we would like to make the following amendments:

- The total area of proposed allocation AL3 is **56ha** (comprising circa 20ha for the SUEZ owned site and 36ha for the adjoining land owned by DC Heaver Eurequity IC Ltd (with Obsidian Strategic AC Limited acting as their promotion partner), and this should be corrected in Policy AL3.
- In the preceding text to draft policy AL3, it is acknowledged that 'there may be potential to deliver a strategic development of 1000 dwellings subject to further evidence including the testing of additional growth on the local highway network'. However draft Policy AL3 refers to a 'minimum of 600 dwellings' which we recommend is replaced with 'up to **1000 dwellings**', with Policy S4 amended accordingly. Initial transport and masterplanning work has identified that the Strategic Site allocation does offer the opportunity to deliver circa 1000 new homes, and we would urge the Council to amend the policy to better acknowledge this position and consequently the significant contribution that this site could make to Chichester's urgent need to plan for a minimum of 12,350 dwellings until 2035. We will share details of ongoing technical assessments to endorse the higher dwelling figure and will continue to engage with officers to agree a housing strategy that will deliver a truly sustainable and deliverable form of development which meets the needs of the existing and future communities of Chichester.
- In collaboration with the neighbouring landowner, my client seeks to deliver high quality community infrastructure across site AL3. It is agreed that this should be provided in accordance with the most up to date Infrastructure Delivery Plan as required by bullet 9 of draft Policy AL3. Given that the precise needs of the emerging neighbourhood are unknown, and surrounding strategic sites are incomplete, we believe that it is however premature to list specific requirements within Policy AL3. In place of this list, we consider the wording of bullet 9 to be suitably robust and request that the draft policy is amended accordingly. We commit to working closely with CDC officers to agree appropriate community provision prior to the preparation of a planning application.
- Land in the south of site AL3 is available within an estimated time frame of 5-15 years. As the northern part of the preferred Strategic Site allocation is within the ownership of DC Heaver Eurequity IC Ltd (with Obsidian Strategic AC Limited acting as their promotion partner), that area could come forward earlier in the Plan period. It is agreed that the site will be masterplanned as a whole, but should instead be delivered through a phased development over a **15 year** period, which will enable the site to commence early and to continue to deliver housing consistently throughout the plan period.
- We are aware that the West Sussex Joint Minerals Local Plan (July 2018) designates the site within the Sharp Sand and Gravel Consultation Area, as supported by Policy M9, although note that this safeguarding washes over the entire city of Chichester and surrounding area. Given the Sites known history as a former sand and gravel quarry site, that was subsequently landfilled, it is highly unlikely that there would be mineral deposits remaining on this Site that would be practicable or environmentally feasible to extract. This position will be fully assessed and explained in any planning application.

### Proposed Settlement Boundaries

6.5. CDC has undertaken a Settlement boundary review of Chichester City (SB1) as shown below:

#### Settlement Boundary review – Chichester city - SB1



### SUEZ Response

6.6. It is observed that this settlement boundary review proposes to extend the Chichester city settlement boundary to the east of Chichester to include the Shopwyke Strategic development site, the approved Oving Park appeal site which is located directly adjacent to preferred Strategic Site allocation AL3, and the Fuel Depot Site, located directly to the south of AL3. However, site AL3 itself is currently excluded from the proposed extension to the settlement boundary, as shown above, and on plan ref: **Figure 2**.

- 6.7. At para 6.21 the Preferred Approach document states that *'the East of Chichester development location is planned as an extension of Chichester City, south of the Shopwyke strategic development location, forming a new neighbourhood... with access to the existing facilities in the city'*. Given that the Local Plan Review identifies that site AL3 is planned as an extension to the City, we would strongly suggest that it would be logical and appropriate for Strategic Site AL3 to also be included within the extended City settlement boundary, rather than be surrounded north, west and south, but excluded.

### **Housing Mix**

- 6.8. SUEZ understand that the Local Plan must ensure that a sustainable mix of homes is provided. The NPPF is clear that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (Para 61). Draft Policy DM2 (Housing Mix) Part 1 prescribes the mix of housing sizes and tenures (market and affordable) sought for all new residential developments.

### **SUEZ Response**

- 6.9. We welcome the flexibility within Part 2 of draft policy DM2, which explains that an alternative mix will be accepted where alternative housing need evidence is submitted or where the non-market housing needs are met. This should however be subject to viability, to provide sufficient flexibility to avoid inhibiting the delivery of much needed new homes.
- 6.10. SUEZ therefore requests the following addition to draft Policy DM2 Part 2:
- "2. Planning permission will be granted for an alternative mix provided that:  
...  
c. **or, this is supported by robust housing market and viability evidence**".

### **Other Comments**

- 6.11. It is observed that Appendix E of the Preferred Approach consultation document, and the Infrastructure Delivery Plan incorrectly refer to land east of Chichester as site SA3, and this should be corrected to site AL3 accordingly.

## 7. Conclusions

- 7.1. This report provides a review of 'land East of Chichester' and highlights the strong potential of this site to make an important contribution to meeting the current and future housing needs of Chichester. This representation demonstrates that the site is suitable, available and achievable.
- 7.2. The site represents a highly sustainable and deliverable opportunity for high quality development in accordance with the 'Presumption in Favour of Sustainable Development' objectives of national and local policy.
- 7.3. We strongly agree with draft Policy AL3 which allocates the SUEZ owned site, together with land under the ownership of DC Heaver Eurequity IC Ltd (with Obsidian Strategic acting as their promotion partner) for a residential led development east of Chichester to deliver much needed housing in the district. We have made a number of observations which we respectfully request CDC to consider. Critically, we urge the Council to amend the number of dwellings that could be provided on this site, from a '*minimum of 600*' to '**up to 1000 dwellings**'.
- 7.4. The site offers the opportunity for phased development early and continually throughout the plan period. Ongoing assessments of technical and environmental matters including landfilling, landscape, ecology, heritage and transport have shown that there are no constraints to a comprehensive development across the site, in a form which retains manages and protects areas of ecological interest around the lake in the south east.
- 7.5. We also consider that the Local Plan Review should look again at the Chichester City Settlement boundary review exercise, to consequently include proposed allocation AL3 in the proposed boundary.
- 7.6. We will continue to engage with Chichester District Council and other stakeholders in relation to technical and environmental issues to identify and agree a strategy that will deliver a sustainable form of development which meets the needs of the existing and future communities of Chichester.

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