

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

Date: 7<sup>th</sup> February 2019

Dear Sir/ Madam

### **Gleeson Strategic Land Response to the Preferred Approach to the Chichester Local Plan**

Thank you for the opportunity to be consulted on the Council's Preferred Approach to the Chichester Local Plan. Gleeson's response to each of the issues is set out under the relevant headings below.

#### **Page 23 Spatial Vision & Strategic Objections**

Gleeson would like to suggest that the vision should specify that more homes will be delivered in the places people want to live. This would reflect the objectives of the plan set out on page 27.

#### **Page 33 Policy S2: Settlement Hierarchy**

Gleeson agrees with the Council's approach to settlement hierarchy which identifies the Service Villages as suitable places to accommodate new housing. The approach to housing delivery through assigning a housing figure to a number of parishes to be delivered through neighbourhood plans or a subsequent DPD worked well during the current plan period; and so it is hoped this will work well in delivering the housing requirement again.

#### **Page 35 Policy S3: Development Strategy**

Gleeson agrees that the strategy to focus the majority of growth towards Chichester and within the east-west corridor is sound, with suitable levels of development apportioned to a range of settlements. It is encouraging that the allocations to Service Villages are given the importance of strategic development locations whilst providing more flexibility through their delivery of the required housing via Neighbourhood Plans.

#### **Page 36 Policy S4 Meeting Housing Needs**

Gleeson is pleased to see that the Council is seeking to deliver the 12,350 dwellings based on the standard method. Gleeson also considers that a 20% buffer should be included within the Council's land supply to give the robustness required. This is especially important in light of the suppressed housing target adopted within the current plan. It will also be important for the Council to ensure that relevant neighbourhood plans are progressed at pace so that the smaller sites, which can often be delivered more quickly, come online during the first part of the plan period.

The table set out under Policy S4 is potentially confusing. It is suggested that the category 'Parish Housing Requirements' is relabelled 'Non-Strategic Parish Housing Requirements'. This would distinguish between the numbers allotted to parishes through strategic allocations and the remaining parish housing requirements.

### **Page 37 Policy S5: Parish Housing Requirements 2016-2035**

It is encouraging that a time frame has been set out for the production of Neighbourhood Plans following the adoption of the new Local Plan. However it should be made clearer that the same deadline should apply to all neighbourhood plans, including those that have been identified as strategic development locations.

### **Page 64 West of Chichester**

Gleeson agrees with the approach of directing a significant proportion of planned growth towards the settlements along the A259 corridor to the west of Chichester. These settlements are well connected to the Chichester City hub and provide sensible opportunities for sustainable growth.

### **Page 89 Green Infrastructure**

Gleeson agrees with the inclusion of private gardens, allotments and other features such as green roofs and walls as functional parts of Green Infrastructure in the District. As set out within our comments on the wildlife corridors the plan should continue to recognise that development can come forward with a positive impact on biodiversity and can maintain important connections for wildlife through the incorporation of suitable Green Infrastructure within new development.

### **Page 90 Strategic Wildlife Corridors**

Gleeson has commissioned Aspect Ecology to independently review the proposed Strategic Wildlife Corridors. Please refer to the attached briefing note by Aspect Ecology which concludes that development can come forward within the proposed wildlife corridors without undermining their integrity and function.

As set out in the note the proposed route of the wildlife corridors includes existing development and that development could come forward within the corridors without harming their purpose or function. Development proposals with an ecologically led masterplan and suitable layout can ensure wildlife connectivity. There is also recognition within the Preferred Approach Local Plan that Green Infrastructure can be successfully incorporated within new residential development. This would ensure that wildlife is able to traverse sites through this green network.

The review concludes that for the land Gleeson has control over the key features are the hedgerow and ditch/watercourse network. An opportunity is identified to bring forward a sensitively designed and ecologically driven site layout, which will ensure that the key functional habitats of the Strategic Wildlife Corridor are maintained, buffered and remain in dark corridors. The report also notes that development in this location on the east side of Fishbourne could in fact benefit biodiversity through the inclusion of Green Infrastructure and long term ecological management. This will ensure that long term future use of the site by protected species is fully accommodated and could result in a net gain for biodiversity.

Gleeson also suggests that the wildlife corridor at this point east of Fishbourne is extended east of the A27 to acknowledge the presence of key connective underpasses at this location and the role of the habitats east of the A27 as important links.

It is therefore suggested that the wording of Policy S30 is revised to reflect the characteristics of the proposed wildlife corridors and that sensitive residential development will not necessarily harm their function and purpose, and could in fact enhance it. It is therefore proposed that the current wording of Policy S30 is changed to the following:

*'Development proposals within, or in close proximity to, strategic wildlife corridors will be granted where it can be demonstrated that the development will not have an adverse impact on the integrity and function of the wildlife corridor and that for large scale strategic development there are no sequentially preferable sites available outside the wildlife corridor. Development within the strategic wildlife corridor will be acceptable where it does not undermine the connectivity and ecological value of the corridor. Development located in close proximity to a strategic wildlife corridor should protect and enhance its features and habitats.'*

The suggested amendment to the policy wording would still require any development proposals to demonstrate that the function of the wildlife corridor is maintained and not undermined. However it would also provide sufficient flexibility for the consideration of potential sites within the corridors as part of Neighbourhood Plans. Neighbourhood Plans would consequently be able to analyse and select the most suitable locations for growth taking into account the impact of development on the Wildlife Corridors as well as other relevant reasons, such as connectivity, access to facilities etc.

#### **Page 116 & 117 Policy AL9: Fishbourne Parish**

Gleeson Strategic Land controls land to the east side of Fishbourne and the recognition of Fishbourne as a suitable location for additional growth is welcomed. Gleeson believes that suitably designed residential development can come forward on the east side of Fishbourne. It is considered that none of the identified specific issues set out at paragraph 6.65 in the Preferred Approach plan would prevent development coming forward on the east side of Fishbourne.

Development on the east side of Fishbourne is considered to have the least impact on the surrounding landscape, being well contained by existing hedgerows and trees, and the A27 to the north and east. The A27 also acts as a defensible boundary that would prevent Fishbourne visually and perceptively merging with Chichester. It would also be the most suitable location to maximise the potential for sustainable travel links with Chichester City and other settlements along the East-West corridor. Furthermore noise exposure from the A27 can be acceptably mitigated through sensible design. Heritage assets at Fishbourne and their setting would also be preserved through development in this location.

#### **Conclusion**

To summarise the above points, Gleeson Strategic Land's position is that whilst the majority of the plan is supported it is considered that 'Policy S30 Wildlife Corridors' in particular requires amendment to reflect the overriding purpose and characteristics of the wildlife corridors proposed. There will be existing development within the proposed corridors which clearly demonstrates development does not necessarily prevent wildlife connectivity. In fact elsewhere in the plan there is recognition that Green Infrastructure, facilities present in new developments such as gardens, hedging, trees etc. can contribute towards positive wildlife connectivity. The current wording of Policy S30 is therefore considered to be unjustified because it could potentially frustrate Neighbourhood Plans in achieving the most appropriate strategy for delivering the housing requirement for their area. The current wording could result in the most suitable areas for development from being excluded from allocation in future neighbourhood plans. The proposed rewording would clarify that ecologically sensitive and suitably designed development can come forward within the Wildlife Corridors. The revised wording would serve to protect the function and purpose of the wildlife corridors and provide sufficient flexibility for neighbourhood plans to consider the most appropriate sites for development, taking into account all relevant considerations.

The Preferred Approach Local Plan is currently therefore not in our view the most effective way to meet the growth of the plan area and should be modified as proposed. Gleeson would also like to appear at any future examination into this plan to put across the points raised.

Yours Sincerely,



Peter Rawlinson  
Strategic Planner  
T: 01252 360 319  
E: [pjrawlinson@mjgleeson.com](mailto:pjrawlinson@mjgleeson.com)

Submitted by email.