

SUEZ Recycling and Recovery UK Ltd

Hearing Statement

Chichester District Council Local Plan Examination

Emma Smyth

SUEZ Recycling and Recovery UK Ltd

September 2024



Introduction

1. This Hearing Statement is submitted by SUEZ Recycling and Recovery UK Ltd to address Matter 6: Area Policies and Allocations, Questions Q.210, Q.211 and Q.214 of the Inspectors' Matters, Issues and Questions regarding draft Policy A8: Land East of Chichester.

Matter 6 - Q.210 Is there clear evidence that the site is neither deliverable or developable in terms of the NPPF?

2. Evidence is presented to demonstrate that there is a realistic prospect that housing will be delivered within five years and that the Policy A8 Land East of Chichester is therefore deliverable and developable.

3. It is noted that the land is within two landholdings: the Obsidian Strategic Asset Management Limited, DC Heaver and Eurequity Ltd land in the north-east, which will be developed as Phase 1 and the SUEZ-owned land in the south-west which will be developed as Phase 2.

4. The delivery of the Phase 2 SUEZ-owned land was addressed in SUEZ's representations of March 2023, notably paragraphs 38 to 53. Since those representations were made, progress has been made within regard to site investigation work onsite which was undertaken in 2023-2024 which shall culminate in the preparation of a remediation strategy.

5. Once the remediation strategy is published for the Phase 2 land, it is SUEZ's intention to submit the Phase 2 land remediation strategy to the National Housebuilders Confederation for the initial stages of their Land Quality Certification Process.

6. This work is ongoing and whilst not completed in time for submission with this representation, SUEZ has provided an update to Chichester District Council (CDC) and shall submit details to CDC in due course and in preparation for the submission of a planning application on this Phase 2 land. A planning application for housing on this Phase 2 land is expected to be submitted in 2025.

7. In addition to this site investigation work, SUEZ has continued to work closely with the neighbouring landowners of the A8 Site Allocation, represented by Obsidian Strategic Asset Management Ltd, DC Heaver and Eurequity Ltd, to develop the indicative masterplan for the whole A8 site allocation; a copy of which is included at Appendix A.

8. With regard to the Phase 1 land, since March 2023, Obsidian and their partners have made significant progress in preparing a planning application. Their work includes community engagement, including a positively-received presentation to Oving Parish Council in September 2023 and formal pre-application consultation with CDC. The planning application will be submitted in September 2024 and it is expected that planning permission will be granted in 2025, with the completion of the first homes in 2028/2029 i.e. within five years.

9. The expected delivery of housing for the entire whole A8 site allocation is set out in the table below:

Year (1 st April – 31 st March)	No. of Dwellings in Phase 1 (the north-eastern portion of land being promoted by Obsidian and partners)	No. of Dwellings in Phase 2 (the south-western portion of land in SUEZ's ownership)
24/25		
25/26		
26/27		
27/28		
28/29	60	
29/30	60	
30/31	60	At least 60
31/32	60	At least 60
32/33	65	At least 60
33/34	65	At least 65
34/35		At least 65
35/36		
36/37		
37/38		
38/39		
Phase Totals:	370	At least 310
Whole A8 Site:	At least 680	

10. In conclusion, the progression of the planning application for the Phase 1 area and ongoing site investigation work and development of a remediation strategy to support a planning application for the Phase 2 area demonstrate that the site is deliverable.

Matter 6 - Q211 Are the site-specific development requirements as set out in the Policy justified, and will they be effective in achieving sustainable development on the site?

11. On the site-specific development requirements, CDC's proposed modification CM304 increases the number of self-build plots from 10 to 34 plots. This significant change made after the Reg 19 consultation is not supported.

Matter 6 - Q.214 Are the suggested MMs necessary for soundness?

12. SUEZ notes CDC's Suggested Modification CM303 to amend bullet point 1 of Policy A8 Land East of Chichester to read: "*Development to include **approximately** 680 dwellings, including...*" In our response to the Reg 19 Consultation, we suggested that the wording be amended to read, "*Development to include **at least** 680 dwellings, including...*"

13. It is SUEZ's view that the whole site can support more than 680 dwellings and this will need to be justified with up-to-date evidence in support of the Phase 2 planning application. The proposed wording, "approximately" unnecessarily limits the potential of the site and in our view is not in line with paragraph 61 of the National Planning Policy Framework, 2023 (NPPF), which states that strategic policies should be informed by a local housing need assessment to determine the "*minimum*" number of homes needed. We would therefore propose that the word "**approximately**" is replaced with the phrase "**at least**"; this still allowing CDC to retain control since it will be necessary to submit sound evidence to support future planning applications but doesn't unnecessarily limit housing delivery.












End



Appendix A: Indicative Masterplan for the whole A8 site allocation



LEGEND

-  Site boundary
-  Wider Policy: A8 allocation
-  Potential residential use
-  Potential open space and recreation
-  Potential open space
-  Potential SUDs location
-  Safeguarded access points
-  Potential primary route
-  Potential secondary route
-  Potential tertiary street
-  Potential private drives



Carter Jonas

PROJECT TITLE
LAND AT DRAYTON WATER, CHICHESTER

DRAWING TITLE
OBSIDIAN STRATEGIC
FRAMEWORK PLAN (INC. SUEZ LAND)

ISSUED BY	London	T: 020 7016 0720
DATE	September 2023	DRAWN OT
SCALE@A2	1:2500	CHECKED JC
STATUS	Final	APPROVED JC

DWG. NO. J0058438_006_V8

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.

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