

Hearing Statement

Chichester Local Plan Examination
Matter 6: Area Policies and Allocations

69 Carter Lane
London EC4V 5EQ

T: 020 7489 0213
F: 020 7248 4743
E: info@dwd-ltd.co.uk
W: dwd-ltd.co.uk

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CONTENTS

1.0 INTRODUCTION.....1

2.0 QUESTION Q.210.....2

3.0 QUESTION Q.211.....6

4.0 QUESTION Q.212.....7

APPENDICES

- APPENDIX 1: SITE-WIDE INDICATIVE MASTERPLAN**
- APPENDIX 2: PARAMETER PLANS**
- APPENDIX 3: CDC PRE-APPLICATION ADVICE**
- APPENDIX 4: STATEMENT OF COMMUNITY INVOLVEMENT**

1.0 INTRODUCTION

- 1.1 This Hearing Statement is submitted on behalf of Obsidian Strategic Asset Management Limited (Obsidian), DC Heaver and Eurequity Ltd and addresses Matter 6: Area Policies and Allocations, in particular Questions Q.210, Q.211 and Q.212 of the Inspectors' Matters, Issues and Questions.
- 1.2 Obsidian, acting on behalf of the landowners DC Heaver and Eurequity Limited, have been promoting part of draft site allocation A8 since 2018. The eastern part of the site allocation is shortly to be the subject of a planning application for residential-led development. The description of development will be:
- “Outline application with all matters reserved (except for access) for the construction of up to 370 dwellings, specialist accommodation for older persons, plots for self/custom build, neighbourhood centre including community uses, employment, retail and primary school (including early years and special educational needs and disability facilities), open space and green infrastructure provision, play areas and associated landscaping, internal roads, parking, footpaths, cycleways, drainage, utilities and other infrastructure and new access arrangements.”*
- 1.3 The application is expected to be submitted in September 2024.
- 1.4 This Hearing Statement follows representations made to the Regulation 19 consultation by Quod, on behalf of the same parties, in March 2023.

2.0 QUESTION Q.210

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

Housing delivery

2.1 The definitions of “deliverable” and “developable” are set out in the Glossary to the National Planning Policy Framework (NPPF) and require evidence that there is a *“realistic prospect that housing will be delivered within five years”*. In assessing this matter, it is necessary to consider the key issues that might affect delivery. These were addressed in Obsidian’s representations of March 2023, notably paragraphs 3.5 – 3.35. Since those representations were made, significant progress has been made in preparing a planning application, to the point where an outline application will be made later in September 2024. The steps taken include:

- Pre-application meetings with Chichester District Council (CDC), in March, April, May and June 2024.
- Community engagement including a presentation to Oving Parish Council (September 2023) and community engagement events both in-person and online (December 2023).
- Pre-application discussions with West Sussex County Council (WSCC), in its capacity as education and highway authority. WSCC have confirmed their interest in delivering a new school in this location.
- Working with the neighbouring landowners Suez Recycling and Recovery Limited, produced an indicative masterplan for the whole A8 site allocation.
- Drafting of a detailed (indicative) masterplan for the eastern part of the A8 site allocation, parameter plans and assessment of these, notably with regard to ecology, heritage, transport, landscape, flood risk and drainage, land contamination, noise, lighting, arboriculture and minerals.

2.2 The indicative masterplan for the site can be seen at Appendix A and the parameter plans to be submitted with the planning application can be seen at Appendix B.

2.3 The most significant work done since the March 2023 representations relates to the layout of the proposals and the proposed Strategic Wildlife Corridor (SWC). Draft Policy A8 requires the design and layout of housing proposals to avoid harm to *“SAC designated species, section 41 priority species, other protected species and the existing habitat features within, and in the vicinity of the*

site, that support these species.” Buffers to the draft SWC sufficient to “reduce light levels down to a maximum of 0.2 lux in the horizontal plane and 0.4 lux in the vertical plane” are required. This has been achieved by siting non-residential uses along the boundary to the proposed SWC, including the school and its playing fields, allotments and SuDS features. CDC officers have expressed their support for this approach, noting that full assessment will be required as part of the planning application¹. This has been undertaken with lighting and noise assessments confirming that light levels will be below the maximums set out in the draft policy and that the SWC will not suffer from noise disturbance. These documents will be available with the planning application.

- 2.4 CDC provided a formal response to the pre-application consultation in June 2024. This can be seen at Appendix C. This provides detailed advice on all the key issues but concludes that:

“...based upon the current policy position, which includes the IPS, it is considered likely, subject to addressing the points raised above, and the provision of satisfactory surveys, reports etc. that the proposal could be considered favourably in principle by Officers.”²

- 2.5 Thus, the proposals have progressed to the point where the applicant and the planning authority are confident that an application will be successful. The expectation is that planning permission will be granted in 2025, followed by reserved matters consents later the same year or in 2026. The first homes will be completed in 2028/29, i.e. within five years. In addition, the owners of the remainder of the A8 site, Suez Recycling and Recovery UK Ltd, intend to submit their own planning application in 2025. Their expectation is that the first houses on their land will be delivered in 2030/31. The expected delivery of housing for the whole of the A8 site allocation is set out in the table below:

¹ See page 17 of CDC’s pre-application advice (Appendix C)

² Page 22

Table 2.1: Expected housing delivery

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	

2.6 Aside from the views of the planning authority, the experience of the site promoters and landowners is relevant to the question of delivery. Obsidian Strategic is an experienced land promotor with a strong track record of securing planning permission for residential and commercial developments and are supported by a strong consultant team. The landowners are also experienced local developers, having overseen the delivery of the adjacent housing development “New Fields”³ and 500 homes as part of the North East Chichester Strategic Development Location⁴. Both parties are therefore well placed to deliver new homes at Land East of Chichester and to do so within the next five years.

2.7 There also appears to be no impediment arising from public opinion. The engagement exercises with both the local community and with Oving Parish Council have been positive and Obsidian have addressed concerns where these have arisen. A Statement of Community Involvement has been

³ 20/02471/FUL

⁴ Phase 1 application refs: 15/03524/OUTEIA and 18/01024/REM; Phase 2 application refs: 16/03791/OUT and 19/03191/REM; Phase 3 granted on appeal: APP/L3815/W/21/3270721

prepared for the planning application that summarises the consultation work and this is included here at Appendix D.

- 2.8 There is, therefore, no reason to believe that the site is undeliverable. The site should be considered “deliverable” in NPPF terms.

Conclusion

- 2.9 The question is whether there is clear evidence that the site is neither deliverable or developable. The work undertaken to prepare the Drayton Water planning application is clear evidence that it is both deliverable and developable.

3.0 QUESTION Q.211

Q.211 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?

- 3.1 Obsidian's comments on the site-specific development requirements are limited to the wording around the number of units and the requirement for self-build plots.
- 3.2 Regarding the overall number of units, it is imperative in a highly constrained area such as Chichester that the development potential of deliverable sites is maximised. The limitation imposed by "approximately 680" homes, as proposed by CDC in their schedule of proposed modifications (CM303) needlessly limits the site's potential. Replacing "approximately" with "at least" would remove this restriction while still retaining control over the quality of development via the need to comply with the National Design Guide, relevant Local Plan design policies and a future Design Code. This would be a more effective approach at achieving sustainable development, given the need to make best use of available sites.
- 3.3 The council's proposed modification CM304 raises the requirement for self-build plots from 10 to 34. Given that the draft allocation has existed since publication of the Regulation 18 Local Plan in 2018, it is very late in the process to be adding such a significant requirement. We recommend that this proposed modification is rejected and the level of self-build provision remains as per the Proposed Submission version of the plan.
- 3.4 Policy A8 (requirement 11) references Policy T1, which Obsidian comment upon in their Hearing Statement for Matter 4A.

4.0 QUESTION Q.212

Q.212 With particular regard to biodiversity and protected species, what is the justification for the proposed site boundary?

- 4.1 Obsidian have commented upon the boundaries of the proposed Strategic Wildlife Corridor (SWC) in their Hearing Statement on Matter 5: Other Policies, specifically Question Q.120. With regard to Policy A8, the work done on the Drayton Water proposals (shown in the appendices to this Hearing Statement) demonstrate that it is possible to accommodate at least 680 homes and the required infrastructure (including neighbourhood centre, school and elderly care facility) alongside the SWC as delineated on the draft Policies Map. An appropriate balance has therefore been struck between having regard to biodiversity and protected species and the need to make use of a deliverable strategic housing site. The proposed site boundary for A8 (and by extension this part of the SWC under Policy NE4) is therefore justified.

APPENDIX 1: SITE-WIDE INDICATIVE MASTERPLAN



- 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



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PROJECT TITLE
LAND AT DRAYTON WATER, CHICHESTER

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

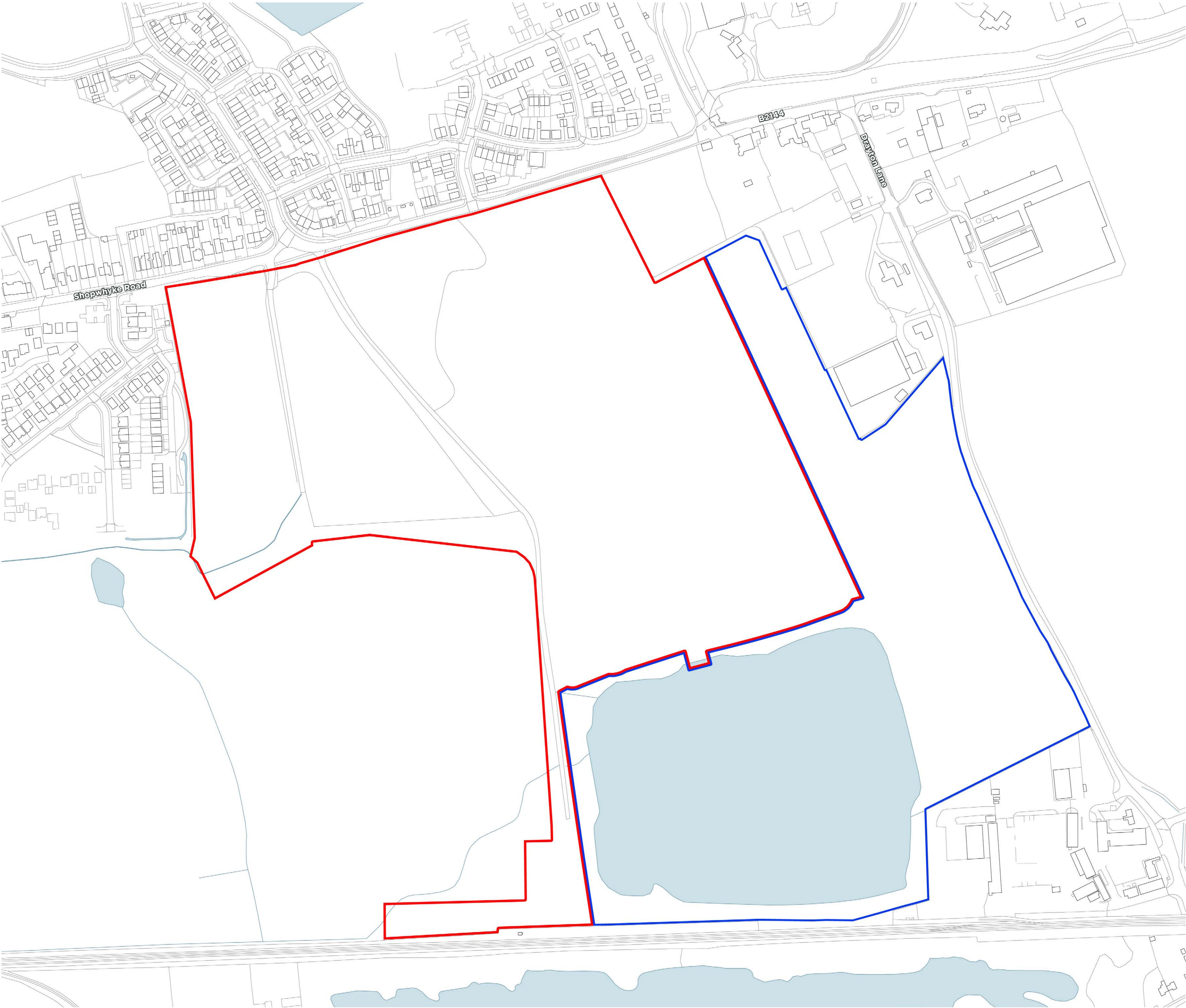
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DATE	September 2023	DRAWN OT
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STATUS	Final	APPROVED JC

DWG. NO. J0058438_006_V8

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All dimensions are to be checked on site.
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APPENDIX 2: PARAMETER PLANS



LEGEND

- Site boundary
- Wider land ownership



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PROJECT TITLE

LAND AT DRAYTON WATER, CHICHESTER

DRAWING TITLE

OBSIDIAN STRATEGIC
RED LINE BOUNDARY PLAN

ISSUED BY

London

T: 020 7016 0720

DATE

June 2024

DRAWN

MH

SCALE@A2

1:2500

CHECKED

JC

STATUS

Design Freeze

APPROVED

JC

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LEGEND

- Site boundary
- Residential use (C3)
- Education use (F1)
- Assisted living & Retirement (C2/C3)
- Indicative area of land required for access and highways, not within the residential land use
- Open Space
- Indicative location of local centre
- Existing water body
- Strategic Wildlife Corridor (SWC)

REFERENCES

NB1: Parameters
Please refer to the following sequence of parameter plans for further information.

- J0058438_007: Red Line Boundary Plan
- J0058438_008: Land Use Parameter Plan
- J0058438_009: Landscape Parameter Plan
- J0058438_010: Access and Movement Parameter Plan
- J0058438_011: Building Heights Parameter Plan



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PROJECT TITLE
LAND AT DRAYTON WATER, CHICHESTER

DRAWING TITLE
OBSIDIAN STRATEGIC
LAND USE PARAMETER PLAN

ISSUED BY	London	T: 020 7016 0720
DATE	June 2024	DRAWN MH
SCALE@A2	1:2500	CHECKED JC
STATUS	Design Freeze	APPROVED JC

DWG. NO. J0058438_008_PL_V1

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LEGEND

Site boundary

Open space

Allotments

Mixed use development area

Indicative location of LEAP

Indicative location of LAP

Indicative location of surface water attenuation basin

Strategic Wildlife Corridor (SWC)

Existing water body

REFERENCES

NB1: Parameters

Please refer to the following sequence of parameter plans for further information.

J0058438_007: Red Line Boundary Plan

J0058438_008: Land Use Parameter Plan

J0058438_009: Landscape Parameter Plan

J0058438_010: Access and Movement Parameter Plan

J0058438_011: Building Heights Parameter Plan



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PROJECT TITLE
LAND AT DRAYTON WATER, CHICHESTER

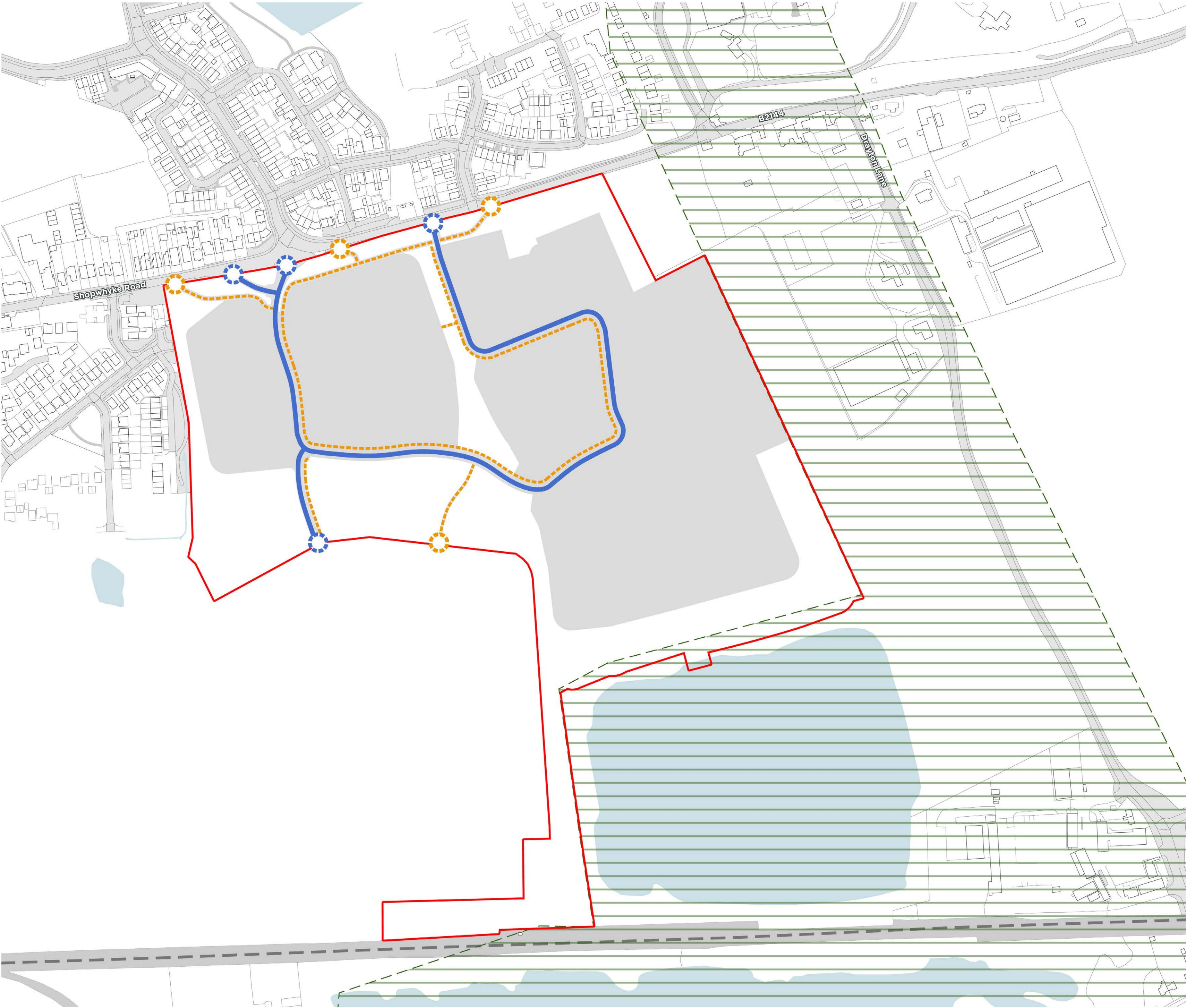
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OBSIDIAN STRATEGIC
LANDSCAPE PARAMETER PLAN

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LEGEND

- Site boundary
- Primary access point
- Primary vehicular corridor (indicative route)
- Cycle / pedestrian access point
- Cycle / pedestrian corridor (indicative route)
- Strategic Wildlife Corridor (SWC)
- Mixed use development area

REFERENCES

- NB1: Parameters**
Please refer to the following sequence of parameter plans for further information.
- J0058438_007: Red Line Boundary Plan
 - J0058438_008: Land Use Parameter Plan
 - J0058438_009: Landscape Parameter Plan
 - J0058438_010: Access and Movement Parameter Plan
 - J0058438_011: Building Heights Parameter Plan



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PROJECT TITLE
LAND AT DRAYTON WATER, CHICHESTER

DRAWING TITLE

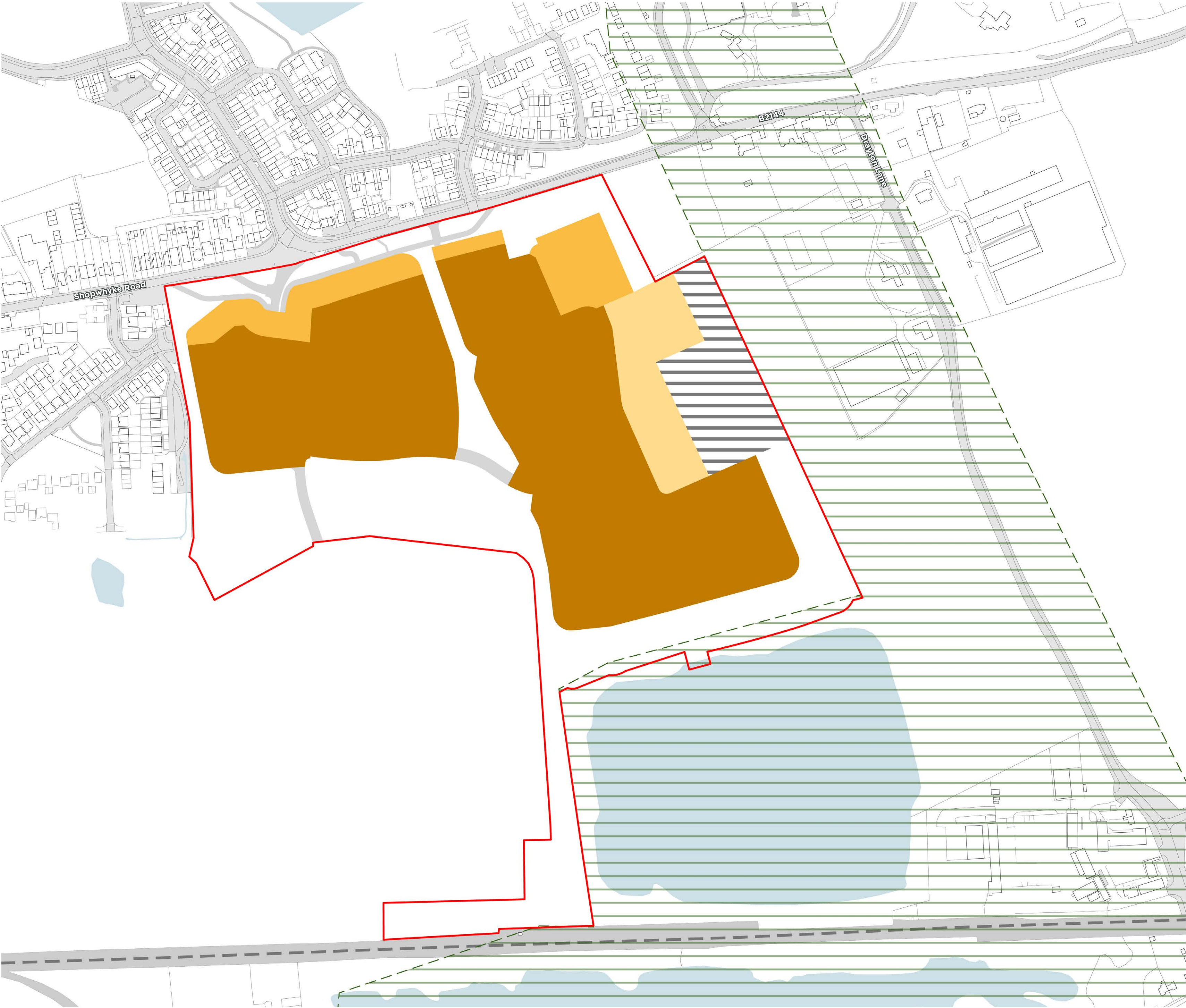
OBSIDIAN STRATEGIC
ACCESS & MOVEMENT PARAMETER PLAN

ISSUED BY	London	T: 020 7016 0720
DATE	July 2024	DRAWN MH
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STATUS	Design Freeze	APPROVED JC

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LEGEND

Site boundary

Up to 3 storey building height

Up to 2 storey building height

Single storey building height

Strategic Wildlife Corridor (SWC)

School grounds

Wider infrastructure area

REFERENCES

NB1: Parameters

Please refer to the following sequence of parameter plans for further information.

J0058438_007: Red Line Boundary Plan

J0058438_008: Land Use Parameter Plan

J0058438_009: Landscape Parameter Plan

J0058438_010: Access and Movement Parameter Plan

J0058438_011: Building Heights Parameter Plan

0

100m

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PROJECT TITLE
LAND AT DRAYTON WATER, CHICHESTER

DRAWING TITLE
OBSIDIAN STRATEGIC
BUILDING HEIGHTS PARAMETER PLAN

ISSUED BY	London	T: 020 7016 0720
DATE	July 2024	DRAWN MH
SCALE@A2	1:2500	CHECKED JC
STATUS	Design Freeze	APPROVED JC

DWG. NO. J0058438_011_PL_V2

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APPENDIX 3: [CDC PRE-APPLICATION ADVICE](#)

Case Officer: Calum Thoms
E-mail: cthomas@chichester.gov.uk
Our ref: O/23/02402/PRELM

7 June 2024

Dear Stephen,

Site address: Land East of Chichester, West of Drayton Lane (B2144), Oving, West Sussex.

Proposal: Pre-application enquiry in relation to a future Outline planning application for residential-led mixed use development comprising approximately 370 dwellings, a neighbourhood centre (comprising flexible units suited to Use Class E, Sui Generis uses, community uses and residential care home), a two form entry primary school, open space, allotments, footpaths, cycleways, associated landscaping, utilities and drainage infrastructure, including on-site pumping station with connection to the strategic foul network and associated infrastructure and groundworks with all matters reserved except for access junctions to the B2144.

I write in reference to your client's pre-application enquiry regarding the above site and provide a response based upon a desktop assessment of the submitted information, the three meetings held, our records and the consultee replies provided. I have considered the information submitted, identified the relevant planning policies and considerations, and provide a summary of our discussions/further advise on the latest iteration of the proposal.

Site Context and Planning History

The enquiry site is located in the countryside, or 'Rest of the Plan Area' as defined by Policy 2 of the Local Plan. It comprises of a predominance of woodland, interspersed with areas of dense scrubland, with a small extent of arable farmland in the north-western corner and extends to approximately 36.2 hectares (ha) in site area. There is a large waterbody located in the southern corner, associated with the historic aggregate extraction and operation of a sand and gravel quarry which was subsequently landfilled until 1990.

The site lies approximately 1.5km east of Chichester city centre, with access into the site from the B2144/ Shopwhyke Road to the north. The A27 (Chichester Bypass) lies approximately 290m to the west, with Bognor Road/ Chichester Road (A259) located approximately 210m to the south beyond the railway line. The site is located in Flood Zone 1.

The site lies within the 12km buffer of the Singleton and Cocking Tunnels SAC and within the 5.6km 'Zone of Influence' for the Chichester and Langstone Harbours Special Protection Area. The Chichester Harbour AONB lies approximately 4km to the west and the South Downs National Park (SDNP) is located approximately 2.5km to the north. In addition, a Strategic Wildlife Corridor, proposed in the Chichester Local Plan 2021 - 2039: Proposed Submission (Regulation 19), lies to the east and encompasses the existing pond to the south east corner.

Policy A8 (East of Chichester) of the Chichester Local Plan 2021 - 2039: Proposed Submission (Regulation 19) seeks to allocate a 39ha parcel of land for a phased residential-led development. This pre-application is for the northern half (the Obsidian land) of the proposed allocation, as the western parcel of land (the Suez Land) lies under separate ownership. The pre-application enquiry includes within its red line a parcel of land which is not proposed to be allocated by Policy A8, notably the inclusion of the area around the existing pond/Proposed Wildlife Corridor.

Planning Policy Situation

The Chichester Local Plan: Key Policies was adopted by the Council on 14th July 2015 and forms part of the Development Plan for the district outside of the SDNP. Legislation requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan also includes 'made' neighbourhood plans. The site falls within the Oving Parish Council designated Neighbourhood Plan area; however, the Neighbourhood Plan is at a relatively early stage of preparation.

Chichester Local Plan 2021 - 2039: Proposed Submission (CLPPS)

The Chichester Local Plan 2021 - 2039: Proposed Submission, was submitted to the Secretary of State for independent examination on the 3 May 2024, and at the time of writing, the Council is awaiting the appointment of an Inspector. The Local Plan Review is an important material consideration in the determination of planning applications; however, the weight that can be attached to the policies contained therein is dependent on the significance of unresolved objection attributed to any relevant policy, commensurate with government policy at Paragraph 48 of the NPPF. As discussed during our last meeting, the application process is likely to coincide with the CLPPS progression through examination, where policies may gain increasing weight. The application submission should therefore seek to address both the Local Plan and the CLPPS, as Officers will be considering the application against both sets of policies, with determination based upon the relevant policies, commensurate with the CLPPS progression through examination.

The proposal responds to draft Policy A8 in the Chichester Local Plan 2021 - 2039: Proposed Submission, which proposes to allocate the land east of Chichester for a phased residential led development to include approximately 680 dwellings, *(including 34 suitable service plots), specialist accommodation for older persons,*

neighbourhood centre incorporating local shops, a community centre, flexible space for employment/ small-scale leisure uses, a one-form (expandable to two-form) entry primary school, on-site public open space and play area and nine gypsy and traveller pitches. However, the intention is to apply for half the proposed allocation, on the Obsidian land by the 21 June 2024, ahead of any likely Examiner's Report or adoption of the CLPPS. As previously described, the weight that can be afforded to the emerging plan and Policy A8 is limited; however, it does indicate the Council's intended direction of travel, and seeking to address each criterion within Policy A8 is strongly encouraged.

Adopted Chichester Local Plan: Key Policies

The relevant Local Plan policies are:

- Policy 1: Presumption in favour of Sustainable Development
- Policy 2: Development Strategy and the Settlement Hierarchy
- Policy 5: Parish Housing sites 2012 – 2029
- Policy 7: Masterplanning Strategic Development
- Policy 8: Transport and Accessibility
- Policy 9: Development and Infrastructure Provision
- Policy 13: Chichester City Transport Strategy
- Policy 33: New residential development
- Policy 34: Affordable housing
- Policy 39: Transport, Accessibility and Parking
- Policy 40: Sustainable design and construction
- Policy 42: Flood risk and water management
- Policy 43: Chichester Harbour Area of Outstanding Natural Beauty
- Policy 45: Development in the Countryside
- Policy 47: Heritage and Design
- Policy 48: Natural Environment
- Policy 49: Biodiversity
- Policy 50: Development and disturbance of birds in Chichester Harbour Special Protection Area
- Policy 52: Green Infrastructure
- Policy 54: Open Space, Sport and Recreation

Four-year Supply Position and Interim Position Statement (IPS)

The NPPF 2023 advises Council's like Chichester that have an emerging Local Plan which has completed its 'Regulation 19' formal consultation stage and is ready to submit for examination, need only identify a four-year supply of housing sites for the 5-year period. The Council has recently re-issued its Updated Position Statement on its 5YHLS housing supply (as of 1 April 2023). The current assessment for the Chichester Local Plan area demonstrates a four-year housing land supply of 4.19 years. However, Paragraph 226 of the NPPF confirm the new arrangement on housing supply is only a temporary

arrangement which will apply for just a 2-year period from the date of publication of the NPPF, which ends on 20 December 2025. As a result, the relevant housing policies in the Local Plan (2, 5 and 45) which were previously considered out-of-date when measured against a requirement to demonstrate a 5YHLS, are no longer out-of-date when measured against the requirement for a 4YHLS which the Council is able to demonstrate.

Although the Council's housing land supply position is greater than 4 years, this is not by a significant margin, and it is therefore important that the Council grants permission for appropriate developments to ensure that the housing supply remains positive to meet the identified needs of the District and enable the Council to control the location of development by defending against inappropriate development proposals. In addition, it is important that housing supply remains buoyant to ensure the Council is able to maintain the provision of a 5-year housing land supply upon adoption of the emerging local plan. In the absence of a 5YHLS housing land supply the Interim Position Statement (IPS) was introduced (see below) and whilst the Council is currently only required to demonstrate a 4YHLS, the document remains a useful tool to consider the merits of a proposal and to ensure that where housing is needed to maintain a housing land supply it is guided to appropriate and sustainable locations.

As the intention is to apply ahead of the completed examination and formal adoption of the CLPSP, the development would be a speculative scheme, albeit one where there is a clear direction of travel, namely the proposed allocation (Policy A8), rather than a plan-led development. Consequently, you are encouraged to demonstrate any future application's compliance with the current local plan policies, and those within the CLPPS. In addition, any future application must include a IPS justification statement setting out how the proposal and any necessary mitigation addresses the 13 identified criteria.

Planning Assessment

Principle of Development

The primacy of the Development Plan and the plan-led approach to decision-taking is a central tenet of planning law and is enshrined in section 38(6) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) which states that applications 'should be determined in accordance with the development plan unless material considerations indicate otherwise'.

The site currently lies outside of a Settlement Boundary, within the Rest of the Plan Area, wherein Policies 1, 2 and 45 of the Local Plan resist development of the nature and scale proposed. It will therefore be necessary to demonstrate why a departure from the development plan would be appropriate in this instance, considering the proposed A8 allocation, and through compliance with the IPS.

Criterion one of the IPS requires a site boundary in whole or in part to be contiguous with an identified settlement boundary and even if separated by a road, it must show that it is sustainable and integrated with the settlement it adjoins. Criterion two requires that the

scale of development proposed is appropriate having regard to the settlement's location in the settlement hierarchy and the range of facilities which would make it a sustainable location for new development.

Whilst the proposal would not currently be capable of meeting criterion one of the IPS, it is noted that the Schedule of proposed changes to the Policies Map for the CLPPS, indicates the revised settlement boundary would include the Redrow Homes development and the land for the proposed Policy A8 allocation. It is also acknowledged that the proposal is situated close to Chichester city, which is identified by Policy 2 of the Local Plan as a sub-regional centre providing education, health, employment, and entertainment facilities for a wide catchment area, extending outside the district. Policy 2 also advises that the city will continue to be a focus for major development in the Plan Area, indicating the scale of development sought by this pre-application is likely to be appropriate in this location. Clear evidence to support the sustainable location of the proposed site should be submitted with any future application to support criterion 2 of the IPS.

Masterplan

As discussed, whilst Officers appreciate the proposed allocation lies within the ownership of two landowners, criterion 1 of Policy A8 requires the site to be masterplanned and designed to provide for a high-quality form of development in accordance with the National Design Guide and any design code or guidance adopted or approved which is relevant to the site. As such, it would be necessary to provide a masterplan vision for the entire site, as is your intention, as part of the planning application submission. As confirmed, the Planning Committee does not need to have endorsed the masterplan before submission of the planning application; however, it is likely Officers would present it to Planning Committee for endorsement ahead of presenting the planning application for determination.

The masterplan will need to comprehensively consider both halves of the site, to ensure the Council can consider the strategic development 'in the round' and persuade Officers that the required infrastructure can be accommodated. As both halves of the site are progressing separately, the masterplan will also need to demonstrate the Obsidian site is capable of meeting its infrastructure demands separately and then cumulatively should the Suez site come forward. It will need to illustrate how infrastructure, designed to meet the entire allocation (the school and local centre etc.) will be phased to deliver what is required for this development and then the subsequent development should that come forward. This should be detailed within a phasing plan that includes timescales of delivery, and clearly details what will be provided by the proposed development.

The current pre-application proposal seeks to deliver a slightly higher proportion of housing on the Obsidian half of the land. To persuade Officers there is adequate infrastructure, including open space, local centre etc, the overall density/delivery of

dwellings (across both sites), and the necessary infrastructure should be clarified on the masterplan.

Scale of Development

Policy A8 of the CLPPS seeks to allocate approximately 39ha of land at Land East of Chichester. The 'red line' for this pre-application includes the north east half of the proposed allocation, together with land outside of the allocation within the proposed Westhampnett-Pagham Harbour Strategic Wildlife Corridor. The land subject to this pre-application which falls within the proposed allocation amounts to approximately 20 ha with the remaining half (Suez land) amounting to approximately 21ha, in an almost even split.

The proposed allocation is for approximately 680 dwellings, across the entire allocation, but the pre-application which covers just under half the allocated area, seeks 365 dwellings, 25 dwellings above half the intended number of dwellings. If this density were to be replicated on the Suez land this would likely deliver around 730 dwellings, 50 above the intended allocation. As the pre-application site is delivering the school, older persons accommodation, and local centre, which in land area terms would be capable of meeting the requirements for the entire allocation, the number of dwellings proposed is surprising and in Officers view overly ambitious.

Whilst building at higher densities can be appropriate, the IPS, local plan policies and Policy A8 require the development to respect the character and appearance of the settlement and deliver adequate on-site infrastructure. As such, Officers will need to be convinced the higher delivery of dwellings can be comfortably achieved in this edge of settlement location of the site, without compromising the landscape character or provision of adequate infrastructure. The density is also contingent upon the off-site delivery of the nine Gypsy and Traveller pitches and sports provision which Policy A8 specifies should be delivered on-site, which are discussed in more detail below

Landscape

The site is located within sub-area CH39 Sherwood Worked Ground of the Chichester District Landscape Capacity Study (2019) and is identified as having medium capacity for development. The site retains a somewhat rural character despite its previous use and contributes to the countryside surrounding the city and the wider setting of the cluster of listed buildings at the junction of Shopwhyke Road and Drayton Lane. There are views from local roads and railway across this area with some views out to Chichester Cathedral and Oving Church spires and potentially panoramic views to the key locations within the South Downs.

The landscape study concluded that some development may be accommodated adjacent to the existing settlements, around existing cluster of built form or on previously developed land, provided it is informed by further landscape and visual impact assessment and sensitively integrated into the landscape, however great care would need to be taken to avoid any landscape or visual harm. Any future

planning application must demonstrate how the proposal is landscape led and fully complies with the Landscape Capacity Study and is appropriate in this edge of settlement development.

The pre-application proposal has considered retaining the setting and character of the cluster of buildings at Shopwhyke Road/Drayton Lane (including the listed buildings at Shopwhyke Manor, Shopwhyke Hall and Shopwhyke Grange) and protect key views. Officers acknowledge that the pre-application proposal has sought to incorporate an appropriate the level of separation between the listed buildings, and the proposed development so as to ensure no likely adverse impact upon their setting. The suitability of the layout and the impact upon the listed buildings, and their setting will need to be fully explored within a heritage statement, submitted with the planning application.

Policy 47 of the Local Plan requires development to respect the predominantly open and undeveloped character of the area and the openness of the views towards the city, Cathedral and South Downs. Policy A8 highlights the need to ensure key views, particularly of Chichester Cathedral spire, are protected and that such views are considered as part of the design and layout of the proposed development in order to create attractive views and vistas, particularly from important public spaces.

The South Downs National Park Authority (SDNPA) have previously advised they expect that the visual setting of the National Park and key views and visual character should be fully explored within the LVIA that accompanies the application. The SDNPA has also advised that development outside of the National Park (even when in close proximity to existing sources of sky glow) can adversely affect sky quality within the Dark Night Sky (DNS) Reserve. The viewpoints for the LVIA have previously been discussed and have been demonstrated to have had regard to views to and from the SDNP and it is acknowledged a final version of the LVIA will be provided to support the planning application.

Design, Layout and Landscaping

There have been several versions of the indicative layout, provided as part of this pre-application enquiry, which have each sought to address the Officers comments and observations on the Design and layout. The Council's Conservation and Design and Landscape Officers have provided written feedback on previous design layouts. The comments below have taken into consideration the latest layout received on the 5 June. In providing these comments, Officers are mindful the plan provides a high-level indicative layout at this stage, and significantly greater detail will be required to demonstrate it will be a genuine landscape-led and high-quality development.

The indicative layout has evolved in a positive direction, overcoming some of the earlier concerns particularly in regard to the sub-urban to rural transition. This has included revision to the northern boundary and re-considering the placement of built form and the level of screening. The local centre, older persons accommodation and school now all appear to relate better in terms of position and

benefit from pedestrian focussed public realm linking all these uses. The area of public realm added adjacent to the school is a welcomed addition that subject to design evolution should provide a suitable place to accommodate the larger volumes of people at pick up and drop off times. As the design evolves consideration should be given to the position of street furniture and trees / planting to ensure the area benefits from a suitable mix of sunny and shaded locations. The design of the older persons accommodation and school building require further thought to ensure these are suitable for their setting and plot shape and size. The design of the local centre shows the community facility is located on the west side of the proposed built form away from the communal open space. It is appreciated the shop will require space for deliveries, etc to be made, but would it not be preferable for the community building to benefit from a better / direct relationship with the open space? The revised location of the allotments is considered to be an improvement and helps to set the built form away from the Proposed Strategic Wildlife Corridor.

You will need to ensure that all roads are appropriately terminated, and parking areas are well laid out and include meaningful soft landscaping. The parking areas currently appear to have less landscaping and appear intense with continuous area of paving. You should also seek to achieve pedestrian priority through a clear hard landscaping approach. The parking for the care home and allotments currently terminates the public realm and highway and you will need to ensure that it is adequately defined and visually of high quality.

The use of three-story buildings would need to be carefully explored, and limited towards the centre of the site, along the primary access routes, where the National Design Guide encourage strong frontages and focal buildings. However, the older persons accommodation and local centre would need to be limited to a maximum of two stories in height due to their position within the site. The distribution of taller buildings will also need to minimise interruption of key views to Chichester Cathedral and create new public views of the cathedral as an integral part of the development if possible, and this should be informed by the LVIA. A building height parameter plan should be provided with the outline application.

Officers had previously discouraged the use of non- perimeter blocks, and the courtyard arrangements, as we were unconvinced how successful they would be, and the use of courtyards is not characteristic of Chichester. The 5 June layout has resulted in the reintroduction of multiple blocks of housing that are not true perimeter blocks. Officers are unconvinced by their reintroduction and remain to be convinced they would result in a high-quality design and layout, provide adequate amenity for future occupiers, and would not result in poor parking arrangements. Their re-introduction reaffirms concerns regarding the ambitious densities sought by the proposal.

The 5 June layout has resulted in a considerable reduction to the width of the north to south green corridor through the site, which is disappointing. It is also unclear how this aligns with your previous landscape strategy, as the green corridor formed an

important component of the landscape strategy. The broadly rectangular open space, which overlaps with the other half of the site, would be a positive feature for the entire development should both halves be developed. As explored in more detail below, it will be necessary to demonstrate how the revised layout complies with the open space requirements. Officers are particularly concerned with the SuDS to the south west and those within the main open space (adjacent to the LEAP) and we will be particularly keen to understand the nature of these SuDS in order to establish whether they can form usable open space. The relationship of the Western edge of the proposals against the Redrow scheme should be worked on further as the scheme develops. This is an opportunity to connect the two developments and provide a positive space between the two visually and physically. The proposal does not include a connection with the Redrow housing development. To not make connections here would be a missed opportunity to link communities and prevent the developments being disconnected despite being adjacent to each other. This is something which should continue to be explored between relevant parties, in the interests of building a connected and walkable community.

The layout of the site should be based upon a climate resilient approach, with the local centre, school, an older persons accommodation designed to ensure there is shading of large areas of glazing. The dwellings should be designed to maximise the use of Solar PV on south facing roof slopes. As the design evolves, you would be expected to provide meaningful shade to public realm and seating and also in the positioning of street trees to provide shade to buildings during the summer months.

The landscaping shown on the plans is only indicative at this stage, and whilst it does provide an indication on the intended landscape scheme, a fully worked up soft landscaping proposal would be required as the design evolves. The inclusion of tree lined streets is a welcome addition, but you will need to provide sufficient detail to satisfy officers there is space to accommodate tree planting (including tree pits etc), to avoid conflict between built form and established tree canopies and root zones. The indicative landscaping show native hedgerow could help to screen sensitive edges and mitigate wider landscape setting, play, and amenity spaces and this should be developed further. The use of hardscape specifications that consist of a material palette to demonstrate an effective hierarchy of vehicular drives, pedestrianised and shared spaces should also be developed further.

The boundary treatment, particularly along the northern edge are of key importance, with Officers having previously confirmed we would be looking for a planted boundary to the north, which tapers off towards the roundabout. This is intended to ensure the western half of the site, closer to the settlement and exiting development has greater legibility from Shopwhyke Road, whilst the eastern side retains a transitional character into the countryside with the built form set further back, behind established planting. The latest iteration of the boundary has been the most successful, but there would be scope to open it up slightly just east of the roundabout, to allow the buildings there to be fully legible. The breaks in the boundary to allow for pedestrian and cycle access and second vehicle access

appropriately ensure the development is not totally 'closed off' and remains legible even where there is established planting.

The eastern boundary is well established due to the Proposed Wildlife Corridor, which retains a thick planted buffer. It will be crucial not to impact this existing buffer, and care should be taken to ensure an appropriate relationship is retained between the built form and Proposed Wildlife Corridor. The placement of the school, allotments, and older persons accommodation, which are all low-key uses, serve a dual purpose as a visual and ecological buffer to the sensitive eastern boundary. It will be important to ensure adequate screening, fencing and controls on external lighting are incorporated to ensure this.

The southern boundary, within the Obsidian land comprises the existing pond, planting, wetlands, and landscaping, which ensure the built form is set at an appropriate distance into the site. Finally, the western boundary with the Redrow Homes development, feels too narrow in places, and Officers would need to see improvements to this boundary to be satisfied there is adequate space for the landscaped area, drainage, footpath, and internal road.

In summary, the layout of the pre-application layout has evolved in a positive direction from the initial layout/pre-application meeting through to the Design Meeting 2 layout. The local centre, older person accommodation, school site and allotments are more resolved, and better related to each other. The treatment of the northern boundary has also improved, as has the built developments relationship with the Proposed Wildlife Corridor. However, it will be necessary to further consider the above comments, particularly in relation to the 5 June layout which is less successful than the Design Meeting 2 layout. Officers also remain to be convinced that the level of development proposed together with associated infrastructure can be achieved on the Obsidian site. As the design progresses, there will be a need to provide greater levels of detail to demonstrate the proposal will be a genuine landscape-led and high-quality development.

Market and Affordable Housing - Size, Mix & Tenure

The consultation response from the Council's Housing Delivery Team, has previously been provided and is based upon the initial 270 dwellings (now revised to 265). As the size and tenure of dwellings are unknown, their comments are based upon the typical mix required to ensure a policy compliance scheme.

National planning policy requires a minimum of 25% of all affordable homes secured through developer contributions to be First Homes. Local authorities should then prioritise securing their policy requirements for rented properties once they have secured the First Homes requirement. Other tenure types should be secured in the relative proportions set out in planning policy and supporting evidence. For Chichester the required proportions are as follows:

- First Homes – 25%
- Social Rent – 35%

- Affordable Rent – 22%
- Shared Ownership – 18%

	Open Market		First Homes		Social Rent		Affordable Rent		Shared Ownership		Total
	Units	%	Units	%	Units	%	Units	%	Units	%	
1 bed	12	4%	12	43%	16	41%	8	40%	-	-	48
2 beds	93	36%	16	57%	12	31%	6	30%	12	50%	139
3 beds	103	40%	-	-	8	20%	4	20%	8	33%	123
4 + bed	51	20%	-	-	3	8%	2	10%	4	17%	60
Total	259	100%	28	100%	39	100%	20	100%	24	100%	370

Affordable housing should be scattered throughout the development, in groups which do not exceed 15 dwellings and they should not be distinguishable from open market dwellings. Different tenures of affordable housing cannot be placed within the same flatted blocks. The Council's preference would be for two bed units to be dwellings, to reduce additional service charges where possible and provide direct access to outside space for children.

Policy H8 requires all housing sites over 200 units (including those allocated within the plan) to provide specialist accommodation for older people to include a support or care component. This proposal seeks to provide older person accommodation, with support or care components adjacent to the local centre. In addition to this, H10 states 5% of affordable housing must meet wheelchair accessibility standards, with the remaining meeting the accessibility and adaptability standards. As such, we would expect the proposal to provide some bungalow accommodation, in order to meet the accessibility requirements. Policy A8 requires the provision of self-build plots, and it will be necessary to demonstrate to Officers how the outline application addresses this requirement.

Neighbourhood Centre

Policy A8 requires 'A neighbourhood centre incorporating local shops, a community centre, flexible space for employment/ small-scale leisure uses and a two-form entry primary school with provision for early years/childcare and special educational' to be provided. The previous pre-application confirmed Officers anticipate the commercial use to including those within Class E which are suitable in residential areas such as smaller scale offices/business/retail/recreation/café uses.

The Council's Economic Development Service notes there is limited details of the commercial element of the scheme, in relation to the pre-application site and the wider proposed allocation, as the commercial centre should be capable of meeting the demand for the entire proposed allocation. As such, it has not been possible to provide comments on the viability of the proposed commercial uses or the likelihood of a commercial occupier/occupiers coming forward to fill the space. Nevertheless, Officers support one local centre identified for the whole strategic allocation and agree the proposed location of the commercial centre is best placed to serve the

development and the wider catchment of the Redrow Homes and Shopwhyke developments which is likely to best ensure the commercial viability.

In our last meeting, Officers advised that the local centre feels small, particularly the community building, shown at 170sqm. The local centre should meet the needs of the entire A8 allocation. Policy P15 (Open Space, Sports, and Recreation) and the suggested modifications published on the Council's website, of the CLPPS sets out within table 6.4 the minimum size and internal requirements for a community hall for a development of this size, with the minimum being 300sqm. As you are aligning the development to meet the requirement of Policy A8, you should also be looking to meet the requirements of Policy 15.

You have subsequently advised, following our meeting that the community building would be made larger, initially exploring it over two floors, but subsequently confirming it can be achieved over a larger single storey footprint. Either approach may be a suitable solution, so long as it delivers a community building with all necessary provision which meets the minimum size requirements. You will need to demonstrate, as part of the outline application information, the illustrative layout of the community building, and local centre, including floorplans of the proposed units, to satisfy Officers the development can adequately meet the infrastructure requirements. On other sites, Officers have looked favourably upon retail units with a greater level of flexibility (i.e., one larger unit which could be subdivided).

If you decide not to provide the full provision of the community building with the first application and instead provide it on a phased basis, this would be acceptable in principle. If the community provision is to be phased it will be necessary to ensure that sufficient provision is provided to meet the needs of the planning application including illustrative details to demonstrate how the future extension would work in layout and built form and meet the overall necessary, level of provision. Full details should also be included with the masterplan.

Primary School

As part of the pre-application, we initially consulted WSCC Education, who raised concern with the layout of the school, as 0.4ha was sited within the SWC and 0.3ha comprised a SuDS pond serving the school and wider development, both of which were unlikely to meet the requirements for a new school. They also confirmed they would strongly resist attempts to provide public access to the school site for the use of the playing fields, as access could cause safeguarding issues and add additional site constraints and management costs to the school administering such use and maintaining the space. They did agree the size of the school site to be acceptable, although it is just below the 2.4ha.

In addition to this, we met with WSCC Education, who provided detailed feedback on the design, which provided clarification on drainage, the location of the 'T' junction, and concerns with teacher parking and the potential bottleneck for

vehicles, and the lack of on-site drop off and visitor parking. As such, the layout of the school has been substantially revised, to address WSCC Education's comments but also those raised by the Council's Conservation and Design Officer, who sought to integrate the school, with the local centre, MUGA/open space, and older persons accommodation. The provision of public playing fields is no longer being explored for the school site, which Officers agree is a sensible approach.

As a result of these changes, Officers consider the school site and its integration with the wider development to be better resolved, although we appreciate further amendments are expected through the course of the application, including to resolve the earlier points on the community centre provision. Similarly, care will need to be given to the placement of the buildings and their interaction with key viewpoints and their contribution to the streetscene. The school will require secure, high boundaries, including to the west boundary, so it would be advisable to explore a layout which could see secure boundaries set further back within the school site, limiting the amount adjacent to the highway. The revised layout has also removed the SuDS pond, in favour of a small swale which would drain the school site only to the south. It will be necessary to address any possible safety concerns (i.e., through fencing etc) and future maintenance issues that may arise during the application.

Open Space

The orange table indicates the on-site open space requirements for 365 dwellings based upon the Planning Obligations & Affordable Housing Supplementary Planning Document (SPD) 2016. These are the current open space requirements which would be applied to the speculative application. However, as discussed and set out above in the context of the community centre provision, as you are aligning the development to meet the requirement of Policy A8, you should look to meet the revised open space requirements of Policy 15. As such, the blue provides the same calculations based upon the on-site open space requirement, but for the Chichester Local Plan 2021 - 2039: Proposed Submission including the Council's suggested modifications, which have amended the figures and introduced two new categories, accessible natural green space, and equipped play space (youth).

Open Space Requirements - Planning Obligations & Affordable Housing
Supplementary Planning Document (SPD) 2016.

Housing Mix						
Number of dwellings	1 bed	2 bed	3 bed	4+ bed	TOTAL	
Enter number of dwellings	47	138	122	58	365	
Household size (persons per dwelling)	1.3	1.8	2.3	2.7		
Equivalent number of residents	61.1	248.4	280.6	156.6	746.7	
On-site Open Space requirement						
Open Space requirement	Equipped Play Space	Amenity Open Space	Parks, Sport & Recreation Grounds	Natural/Semi-Natural Green Space	Allotments	Total
Requirement per 1000 population (hectares)	0.15	0.50	1.60	1.00	0.30	3.55
Total requirement (hectares)	0.112	0.373	1.195	0.747	0.224	2.539
Threshold for on-site provision	50 dwellings	10 dwellings	200 dwellings	200 dwellings	200 dwellings	
On-site provision required?	Yes	Yes	Yes	Yes	Yes	
Required on-site open space (hectares)	0.112	0.373	1.195	0.747	0.224	2.651
Required on-site open space (sq.m)	1,120	3,734	11,947	7,467	2,240	26,508

Open Space Requirement - Chichester Local Plan 2021 - 2039: Proposed Submission including the Council's suggested modifications.

Housing Mix								
Number of dwellings	1 bed	2 bed	3 bed	4+ bed	TOTAL			
Enter number of dwellings	47	138	122	58	365			
Household size (persons per dwelling)	1.4	1.8	2.4	2.8				
Equivalent number of	65.8	248.4	292.8	162.4	769.4			
On-site Open Space Requirement (Chichester Local Plan 2021 - 2039: Proposed								
Open Space requirement	Equipped Play Space (Children)	Amenity Green Space	Parks, Sport & Recreation Grounds	Accessible Natural Green Space	Allotments	Equipped Play Space (Youth)	Total	
Requirement per 1000	0.075	0.65	1.20	1.20	0.30	0.075	3.50	
Total requirement	0.058	0.500	0.923	0.923	0.231	0.058	2.692	
Threshold for on-site provision	50 dwellings	20 dwelling	100 dwellings	TBC (Required for this development)	100 dwellings	100 dwellings		
On-site provision	Yes	Yes	Yes	Yes	Yes	Yes		
Required on-site open	0.058	0.500	0.923	0.923	0.231	0.058	2.693	
Required on-site open	577	5.001	9.233	9.233	2.308	577	26.929	

As you can see, the overall required on-site provision is not significantly greater within the blue table, mostly due to a reduction in the requirement for on-site parks, sports, and recreational grounds. The distribution between the categories is different, with a greater amount of equipped play space, amenity green space, accessible natural green space and allotments required.

The on-site open space provision detailed within the Design Workshop 2 presentation and is set out below, and the corresponding-coloured brackets compare the provision against the requirements of both tables overleaf. However, the layout has subsequently been replaced by the revised layout received on the 5 June 2024 and the relevant open space figures have not been provided or calculated for this pre-application response. It will be necessary to demonstrate the actual requirements are met on the revised layout.

- Parks and Recreation = 0.94ha (-0.255ha) / (+0.17ha)
- *Equipped Play Space (Children) 0.06ha (however this notably includes unequipped play space) (-0.052ha) / (+0.02 but includes non-equipped)
- Allotments = 0.23ha (+0.006ha) / (-0.001ha)
- *Amenity and Natural Green Space = 2.79ha (+1.67**) / (+1.367**)
- *Equipped Play Space (Youth) = 0.00ha (children & youth not separated) / (-0.058ha)

**Please indicate separately for the planning application.*

***Officer will need to be satisfied all space included within these figures is usable i.e., some SuDS if mostly wet, fenced or steeply graded may be excluded. In addition, landscaping /buffer areas are unlikely to meet the requirements of open space land.*

The Design Workshop 2 layout was mostly compliant with the open space requirements, but there is a clear shortfall in the equipped play space generally, and it is unclear how the youth equipped play space would be catered for. This shortfall appears to have been carried over to the 5 June layout, as the centralised LEAP overlooked by residential units is welcome, it is too small and should either ideally be increased in size or a second LEAP provided to meet the shortfall. Similarly, the two LAPs appear rather small, and Officers would question their overall quality and usability. There could be an opportunity to provide a LEAP and or LAP closer to the school, as they could provide useful space outside of the school grounds that could tie in with the local centre and be utilised before and after school pickup times by parents/carers etc.

You will need to demonstrate the areas included within the amenity green space and accessible natural green space are accessible and provide meaningful amenity space within the development. In order for SuDS areas to be included, you will again need to demonstrate these would be usable for the majority of the year, and not permanently wet, fenced or steeply graded to prevent usability.

The area reserved for wildlife 2.39ha would not be included within the open space calculations as it serves as a buffer to the SWC. The landscape gateway 0.12ha appears as though it could fall into amenity space, although again Officers would need to be satisfied on the usability of the space

Sports Provision

It is generally accepted the on-site provision of playing pitches, is unlikely to be appropriate, due to the lack of available space, but also due to concerns that it would result in a disjointed and underutilised provision.

As an alternative to this, off-site provision would be an appropriate solution; however, the Council has no available land to accept a financial contribution to deliver playing pitches. As such, if off-site playing pitches were to be proposed, you would be required to identify a suitable area of land to provide the pitches and all necessary associated infrastructure including parking, changing facilities and storage/maintenance equipment provision, and demonstrate, via securing planning permission (for the pitches and ancillary provision) that they are a realistic off-site alternative. It would be necessary to secure planning permission for the pitches and ancillary provision before outline planning consent could be granted. The S106 obligation would also require the off-site provision to be provided, at a realistic occupancy trigger, which would be mindful of the fact that if you apply for full planning permission for the pitches, the permission would be subject to a three-year implementation time limit.

As discussed briefly at our meeting on 04 June 2024, the playing pitch strategy identifies the re-development of the Priory Park Cricket Pavilion as a key requirement to ensure cricket can be retained within Priory Park. The playing pitch strategy identifies the pavilion, to meet the needs of the cricket pitch would require upgrading to align with the ECB specification for a cricket pavilion. As an alternative to the delivery of pitches and ancillary provision, if the development secured the upgrading of the existing facilities at Priory Park Cricket Pavilion, it is Officers view that the development would be considered to have complied with its sports provision requirements.

Again, with regard to the delivery of the upgraded Priory Park Cricket Pavilion, Officers would require certainty the re-development of the cricket pavilion can be delivered, and this could be secured via two routes. In both instances planning permission would need to be secured for the upgraded provision before outline planning permission could be granted.

An indication of the required specification from ECB for a Cricket Pavilion can be found [here](#). Sarah Peyman, the Divisional Manager for Culture and Sport, has indicated that the specification link below is based on a club home pavilion and so she would suggest the community space and kitchen servery in diagram 05.1 on page 28 would be much smaller and there would be no need for spectator toilets.

The first route for delivery of the upgraded Priory Park Cricket Pavilion would be a commuted sum paid to the Council, as land and building owners. The commuted sum would be secured via the S106 obligation, which would require the Council to deliver the re-development works at the pavilion and would need to consider costings for professional services (architects etc.) as well as construction and other costs. The Council would have to undertake a piece of work to cost out the re-development, as these figures are not yet available. The second route would be for you to deliver the re-development yourselves, working closely with the Council to ensure that the proposal fulfils all requirements and is acceptable in planning terms. In this instance the S106 Agreement would secure a suitable trigger for delivery of the upgraded provision.

Ecology

The application will need to be accompanied by the necessary supporting ecological surveys to demonstrate the proposal would not adversely impact the Proposed Strategic Wildlife Corridor (SWC), or the Singleton and Cocking Tunnels SAC, as the SWC and waterbody to the south are considered to be a functionally linked habitat supporting SACs population of Barbastelle bats. In addition, the SWC and pond also represent important habitat for breeding birds and that the site is of greater than local importance for biodiversity.

Our discussions have focused on providing an effective buffer to the SWC, as required by criterion six of Policy A8. The layout has changed several time, in order to provide a greater level of separation between the SWC and built development. The latest layout sees the primary school retain its position along the eastern boundary, so the playing fields (which are typically unlit) and fenced school boundary can provide a sizable and secure buffer to the SWC. Similarly, the allotments have been located to the south of the school, allowing them to again form an unlit, fenced, and sizable buffer to the SWC, which represents a significant improvement from earlier layouts where dwellings were set far closer to the SWC. As a result of this, the layout now provides a far more effective buffer to the SWC than previously seen; however, Officers are unable to confirm whether or not the proposal will adversely impact the potential or value of the SWC/ Singleton and Cocking Tunnels SAC until the final layout, full ecological reports and lighting details are reviewed as part of the planning application and an AA undertaken with Natural England.

Biodiversity Net Gain (BNG)

As of the 12 February 2024 BNG is a requirement for all Major Developments. The proposal is a Major Development, and it would be necessary, as part of the outline planning application to demonstrate BNG. As discussed, it is generally preferable for BNG to be achieved on-site; however, it is acknowledged this is unlikely to be wholly possible, given the site clearance required to facilitate the development. It will therefore be necessary to demonstrate, via the BNG matrix, both suitable on and off-site BNG. As part of the application, the Council's Environmental Strategy Team would review the BNG calculations, together with the proposed biodiversity gain, to

consider its suitability. It will be necessary for off-site BNG and all necessary on-going management and monitoring details and monitoring fees to be secured via the S106 obligation.

Highways

As you will be aware both National Highways and WSCC Highways run a separate pre-application service. High level consultation replies from both National Highways and WSCC Highways have already been provided for your consideration. These provide a detail understanding of necessary requirements for the development. It is also clear that engagement outside of this pre-application has and will continue to take place with both highways authorities in order to provide the necessary supporting information. The Council's transport related validation requirements have already been provided and are confirmed below for clarity.

Flood Risk

The site lies solely within Flood Zone 1 (lowest risk) and in accordance with the NPPF development should be steered to areas at the lowest risk of flooding. As such, and as previously confirmed the site is satisfactorily located in respects of flood risk. An FRA will be required, given the size of the site, and the drainage strategy would need to consider, amongst other things, the small area on the site subject to surface water flood risk, but it is appreciated this has been explored with the LLFA.

Foul Drainage

The proposed site falls within the catchment of the Apuldram WwTW which discharges to Chichester Harbour. To ensure that the Apuldram WWTW does not exceed its environmental permit, the Council's Position Statement 'Managing new housing development in the Apuldram Waste Water Treatment Works catchment' states that major housing development (10+ dwellings) will need to demonstrate no net increase in flows to the sewer network of Apuldram.

It has been advised work remains ongoing with Southern Water to provide an off-site connection which would ensure the foul drainage can be discharged to the Tangmere WwTW. Full details including the results of the Southern Water feasibility/capacity study should be provided with any subsequent application to demonstrate this is a suitable and certain alternative.

Nitrate Neutrality

The site lies outside of the Chichester Harbour Fluvial Catchment, and within the Pagham Rife Fluvial Catchment, and consequently would not be required to demonstrate nitrogen neutrality.

it is however worth noting that if the development does drain to Apuldram WwTW instead of the intended Tangmere WwTW, nitrate neutrality will need to be demonstrated for the foul water discharge as Apuldram WwTW is located within the Chichester Harbour Fluvial Catchment.

Sustainability

It will be necessary to provide a sustainability statement, as part of the outline planning application. As a minimum, it should address the requirements of Policy 40 (Sustainable Design and Construction) and Policy P1 (Design Principles). The sustainability statement should detail how the proposal (particularly the layout) has incorporated sound sustainable design, good environmental practices, and measures to adapt to climate change. This should particularly address how the proposed layout achieves a climate resilient layout. It should also address sustainable building techniques and technology, including the use of materials that reduce the embodied carbon of construction and make use of re-used or recycled materials. It should also evidence how the proposal has been designed to minimise energy consumption, through the building fabric but also through the use of renewables.

The proposal should maximise the use of renewables, with the layout designed to maximise the number of suitable roof slopes for solar PV. The PV should be set within roofs, matt black and non-reflective. You are encouraged to explore the option of PV to be added as an 'optional extra' to dwellings, over and above the minimum PV requirements. The provision of Air Source Heat Pumps is also encouraged, and where they are used, noise specification and details of screening (for the ASHP) should be provided with the application. The proposal will be subject to Building Regulations which require the provision of Electric Vehicle (EV) charging points; however, you should consider how EV charging points will be provided for off-plot parking, visitor parking and within the local centre and school.

Archaeology

The Council's Archaeology Officer has considered the proposed development and has advised that whilst the potential for archaeological interest would have been almost completely negated by historic gravel extraction, small pockets of undisturbed land that may survive could contain deposits meriting preservation. This could be secured by the imposition of a planning condition. The full consultation response from the Council's Archaeology Officer accompanies this letter.

Recreational Disturbance of Chichester and Langstone Harbours SPA

The proposed site falls within 5.6km of Chichester & Langstone Harbours SPA. As such, a financial contribution towards the Strategic scheme of mitigation (Bird Aware Solent) will be required. In addition, given the scale of the development, alone and in combination with the wider A8 allocation, it is likely separate provision to address potential recreational impacts may be required. This might comprise an on-site circular walking route(s) for dog walking and other exercise/recreational pursuits. The potential for impact together with the required mitigation should be detailed within the planning application, to provide Officers adequate details to undertake an Appropriate Assessment.

Gypsy and Traveller (G&T) Pitches

Draft Policy A8 requires nine Gypsy and Traveller pitches to be provided, on-site, if there remains an outstanding need for pitches. At the time of writing, the Council has a significant unmet need for G&T pitches, with the GTAA 2022 (produced as part of the evidence base for the emerging Local Plan) identifying a requirement for a 104 pitches additional pitches, needed in the first five-year period (December 2022 – December 2027) and a further 22 in the five years beyond after December 2027. A number of pitches have been delivered; however, at the time of writing there is approximately 64 pitches that are required to be provided before April 2028. As such, Officers are confident there will be a requirement to provide pitches at the time of submission and consideration of your application.

To date, the masterplan does not indicate G&T pitches will be provided on site, and our discussions have focused on off-site provision. The principle of off-site provision is acceptable, as noted within Policy H11 (Meeting Gypsies, Travellers, and Travelling Showpeoples' Needs); however, this approach would require the submission of a separate planning application, which would need to run concurrent with the outline application and determined ahead of your proposal for housing, as Officers would need to ensure the G&T pitches obtain planning permission, to satisfy compliance with Policy A8/H11.

Any off-site location would need to comply with requirements of Policy 36 of the Local Plan, and Policy H13 and H14, in particular ensuring the pitches are well design/laid out, well related to the nearest settlement and avoid unacceptable harm to the character of the area. Officers strongly encourage the provision of G&T pitches, as close to the A8 allocation as possible, ideally within the same or adjacent parishes as this ensures a wider distribution of pitches across the district. There are some parishes with a higher concentration of G&T population, and Officers are aware of increases tensions between the settled and travelling communities. In your search for a suitable off-site location, Officers would encourage further discussions with the Council, which should take place via a separate and focuses pre-application enquiry.

Red Line Boundary

It is Officers view that the red line boundary for the outline application should not include the Westhampnett-Pagham Harbour Strategic Wildlife Corridor, to ensure the application aligns with the intended A8 allocation. However, where works within the WC are required to facilitate the proposed controlled access and require planning permission, then the red line should be revised only to include the necessary land for the controlled access. A blue line should be uses to denote wider land ownership.

S.106 Agreement and Heads of Terms

In the event the planning application submitted by your client receives a favourable officer recommendation, that recommendation will be subject to the applicant

entering into a S.106 agreement. The provision of appropriate infrastructure will reflect that needed for each phase of development but would also need to be able to accommodate future expansion of facilities to incorporate future housing in subsequent phases.

At this juncture the anticipated heads of terms, for the whole allocation, are likely to include the items listed below. Please note that this list is not necessarily exhaustive. Your proposed Heads of Terms should be included as part of your application documents.

- 30% affordable housing (no more no less) to a policy compliant mix and tenure and unit size
- Provision of 2 form entry primary school with SEN and pre-school. If to be delivered on a phased basis your application will need to identify the whole site requirement, one form entry classrooms (including SEN and pre-school provision) with 2 form entry core as a minimum
- Chichester Harbour SPA recreational pressure mitigation contribution to the Solent Bird Aware scheme, calculated according to final agreed mix of units together with additional on-site SANGS provision
- Any mitigation resulting from the HRA in relation to the Singleton and Cocking Tunnels SAC
- A27 Chichester Bypass junction improvements contribution, in accordance with the formula set out in the draft A27 Chichester Bypass Mitigation SPD (May 2024)
- Open space provision, management, and maintenance
- Equipped play area provision, management, and maintenance
- Allotment provision including car parking and associated infrastructure, management, and maintenance
- Delivery of proposed neighbourhood centre uses
- Landscape (and Ecology) buffers, management, and maintenance
- Any identified off-site highway infrastructure (directly related to the development)
- Travel Plan monitoring fee
- Unadopted Roads clause
- Biodiversity Net Gain (off-site) including management and monitoring fee
- Off-site sports provision/pavilion upgrades
- Off-site Gypsy and Traveller pitches
- S106 monitoring fee

Validation

The local list can be found [here](#).

It is likely you will require the as a minimum the following

- Masterplan and phasing plan
- Application form
- Application fee

- Certificate
- Plans and Drawings, including parameter plans
- Design and Access Statement
- Affordable Housing Statement
- Air Quality Assessment
- Biodiversity and Ecological Assessments (including BNG)
- Community Infrastructure Levy & S106 Planning Obligations Heads of Terms
- Flood Risk Assessment
- Drainage Assessments
- Interim Policy Statement Justification
- Land Contamination Assessment
- Lighting Assessment
- Noise Assessment
- Sustainable Construction and Design Statement
- Transport Assessment (including all relevant information as advised by NH and WSCC Highways)
- Road Safety Audit
- Travel Plans and Travel Plan Statements
- Parking Assessment
- Tree Survey/Arboricultural Implications & Method Statement
- Heritage Statement

Conclusion

The pre-application proposal has evolved in a positive direction through our on-going discussion and design reviews. It addresses many of the points raised within our initial meeting, and the earlier 2022 pre-application response. The 5 June layout has been considered, and Officers have provided a number comments which require further thought and consideration. The indicative layout will need to be worked-up to a fully detailed proposal (at reserved matters stage) and this should build upon the positive work of this pre-application and the design code, once developed.

The progress on the pre-application scheme has coincided within the Council's progression of the Chichester Local Plan 2021 - 2039: Proposed Submission which has now been submitted to the Secretary of State for examination. The pre-application proposal is now significantly more advanced than earlier versions and has addresses in principle many of the requirements of the Policy A8 allocation, although some off-site aspects, require further work and separate planning application.

As discussed, the proposal would be submitted ahead of the Examiners Report for the CLPPS, which means it will be necessary to address both local plan policies within your submission. It would be for Officers to determine the application against the most relevant policies, with this being dependent upon the progress of the CLPPS and timescales of the application. However, based upon the current policy position, which includes the IPS, it is considered likely, subject to addressing the points raised above, and the provision of satisfactory surveys, reports etc. that the proposal could

be considered favourably in principle by Officers. It is expected that the level of detail will need to be advanced for submission and consideration at outline application stage. There are still several specific areas that will require further thought and clarification, and these have been detailed above. These should be satisfactorily addressed ahead of submitting the application, to avoid potential delays during the application. It will be possible to address issues during the application, however this often necessitates periods of re-consultation, which could impact agreed timescales of the PPA.

We are in the process of finalising the details of the proposed PPA agreement, which will be able to share with you shortly. Finally, Jo and I would like to thank you for your engagement with the pre-application process, which we hope you have found as useful as we have, in addressing issues and shaping the vision for the East of Chichester (Drayton Water) development.

If you have any queries regarding the contents of this letter, please do not hesitate to contact me.

Yours sincerely,

Calum Thomas

Calum Thomas
Senior Planning Officer
(Majors and Business)

APPENDIX 4: STATEMENT OF COMMUNITY INVOLVEMENT

Drayton Water

Part of the emerging strategic Site A8 allocation

Statement of Community Involvement

Application summary:

Outline application with all matters reserved (except for access) for the construction of up to 370 dwellings, specialist accommodation for older persons, plots for self/custom build, neighbourhood centre including community uses, employment, retail and primary school (including early years and special educational needs and disability facilities), open space and green infrastructure provision, play areas and associated landscaping, internal roads, parking, footpaths, cycleways, drainage, utilities and other infrastructure and new access arrangements.

Prepared for **Obsidian Strategic** by:

Local Dialogue

Piano House

9 Brighton Terrace

London SW9 8DJ

020 7357 6606

September 2024

Contents

EXECUTIVE SUMMARY	3
1. ABOUT THE PROPOSALS	5
2. WHY CONSULT?	6
3. CONSULTATION SUMMARY	7
Phase 1: Initial engagement, Autumn 2020 to Spring 2022	7
Phase 2: More detailed engagement, Spring 2022 - Autumn 2022	9
Phase 3: Focused community engagement, Early 2023 – late 2023	11
Phase 4: Ongoing pre-application engagement, 2024	15
Phase 5: Future engagement, 2024 and beyond	16
4. RESPONDING TO THE EMERGING OIVING DESIGN CODE	17
5. SUMMARY OF INCOMING CONTACT	18
6. HOW THE DRAYTON WATER PROPOSALS HAVE RESPONDED TO STAKEHOLDER COMMENTS	20
7. ABOUT LOCAL DIALOGUE	21
8. CONCLUSION	22
9. APPENDICES	23

Executive summary

From 2020 to summer 2024, Obsidian Strategic (on behalf of DC Heaver and Eurequity), supported by a comprehensive project team, has conducted an extensive consultation on its proposals for the Drayton Water development, a major residential-led scheme located east of Chichester. This consultation process has actively engaged the local community, including Oving Parish Council, nearby residents, district and county councillors, and other stakeholders, allowing them to understand the proposals and provide valuable feedback.

Consultation Activity

- **Engagement with Local Authorities:** The initial Masterplan and proposals were shared with Oving Parish Council, West Sussex County Council, and relevant district councillors from as early as October 2020. Regular meetings were held to present updates and gather feedback.
- **Dedicated Consultation Website:** A dedicated consultation website was launched in September 2021, providing detailed information on the development, a feedback form, and a project email. The website has seen over 525 unique visitors.
- **Leaflet Distribution:** Leaflets outlining the updated Masterplan were distributed to local residents to encourage participation in consultation events.
- **In-person Drop-in Event:** A public drop-in event was held on 12 December 2023 at Oving Jubilee Hall, attended by 39 residents, providing an opportunity for direct engagement with the project team and discussion of the proposals.
- **Online Presentation Event:** An online presentation was conducted via Zoom on 14 December 2023, attended by 6 residents, allowing for broader participation and Q&A about the development.
- **Ongoing Engagement:** Since early 2024, Obsidian Strategic has continued to update the consultation website with refined proposals and engage in direct communications with key stakeholders, including the emerging Shopwyke Residents' Association.

Feedback

Since 2020, the team has received:

- 525 unique visitors to the consultation website
- Numerous emails and phone calls to the project hotline and dedicated email address
- 39 attendees at the in-person consultation event
- 6 attendees at the virtual consultation event
- A significant number of questions and comments during public presentations

Positive Feedback:

- Recognition of the need for affordable housing and specialist care facilities within the development.
- Support for the inclusion of public open spaces, green infrastructure, and community amenities.

Concerns Raised:

- **Traffic and Highways Impact:** Significant concerns were raised about the potential increase in traffic and insufficient pedestrian and cycling paths.
- **Loss of Green Spaces:** Issues were voiced regarding the loss of fields and public footpaths that the development might cause.

- **Environmental Impact:** Several residents were concerned about the impact on wildlife and local habitats, particularly in relation to the Strategic Wildlife Corridor.
- **Local Identity:** Worries were expressed that the development could lead to the loss of Oving's 'separate identity' and rural character.
- **Property Values:** Some residents were concerned that the new development could negatively impact the value of their properties.

While feedback on specific elements of Obsidian's proposals was generally neutral, with most focusing on specific impacts to their properties, a significant portion of respondents expressed opposition in principle to new housing developments in this area, rather than objections to specific elements of the Drayton Water proposals.

The feedback from the consultation process has been invaluable in refining the Drayton Water proposals to better align with community needs and concerns. However, there remains a clear sense of opposition from some community members against the principle of new development in the area. Obsidian Strategic remains committed to ongoing engagement and ensuring that the development contributes positively to the local community and environment.

1. About the proposals

Drayton Water is part of a strategic site allocated for residentially led development in the emerging Chichester Local Plan (Site A8, Land East of Chichester), which is allocated within the emerging Chichester Local Plan. The draft Local Plan states that site A8 can deliver approximately 680 new homes, specialist accommodation for older persons, a neighbourhood centre (incorporating local shops, a community centre, flexible space for employment/ small scale leisure uses and a one-form (expandable to two-form) entry primary school with early years and Special Education Needs and Disability (SEND) provision) and on-site public open space.

The land comprising site A8 is split into two separate ownerships. A large area in the southeast of the site is owned by Suez Recycling and Recovery Limited. The remainder of the site - the element known as Drayton Water - is being promoted by Obsidian Strategic, on behalf of the landowners DC Heaver and Eurequity.

It is important to note that the policy position for the site has changed over time, particularly regarding how many homes it can provide. At Regulation 18, the number was 600. This then rose to 940, and ultimately, following the inclusion of the Strategic Wildlife Corridor, the number dropped to 680 across both ownerships.

At this stage, Obsidian Strategic, DC Heaver and Eurequity are looking to submit an outline planning application for Drayton Water, to deliver a green, connected and inclusive community.

The Drayton Water proposals include:

- Around 370 new homes, including affordable homes
- Land for a two-form entry primary school, early years centre and SEND hub.
- A care home, including care and extra care suites
- 8 acres of public open space, plus a 15-hectares of retained green space as part of the draft Strategic Wildlife Corridor
- A new neighbourhood centre including shops and a community hall

The indicative masterplan for Drayton Water is shown below:



2. Why consult?

Consultation allows communities and stakeholders the opportunity to view and comment on proposals and for applicants to consider this feedback as they develop their proposals.

A thorough consultation can improve the process of bringing forward plans for housing in areas like Chichester by addressing issues and explaining proposals before applications are submitted and in doing so, help to make schemes better.

Consultations can often lead to increased support for proposals, as individuals and communities assume a sense of ownership for those elements, they feel they have influenced.

A successful consultation will engage the local community, making them feel informed about, and comfortable with, the proposals.

This can ensure that local residents are already familiar with, and informed about, the proposals when an application is made.

National legislation

The Government's National Planning Policy Framework (NPPF), revised in December 2023, encourages organisations making proposals for new developments to encourage local communities to engage from an early stage in their work. The NPPF is informed by elements that are key to creating 'healthy' planning outcomes, all of which should include the economic, social and environmental elements within the planning process.

The Localism Act (2011) seeks to encourage local people, representatives and businesses to engage with the planning system at a local level, and to make decisions about the future growth and expansion of their own neighbourhoods.

The ethos at the core of both the Localism Act and NPPF, which is in line with the previous governments' reforms, is about giving local people the chance to help make decisions in their area.

Chichester Policy

The site falls within the boundaries of Chichester District Council (CDC), and is identified as strategic site A8 in the emerging Local Plan

In its current Local Plan, 2014-2029, CDC states that 'Preparation of masterplans will involve the active participation and input of all relevant stakeholders, including the Council, landowners, developers, the local community, service providers and other interested parties.'

Obsidian Strategic's consultation approach has been guided by this statement.

3. Consultation summary

Obsidian Strategic, DC Heaver and Eurequity have undertaken an ongoing consultation programme around its Drayton Water proposals for approaching four years.

This consultation has been designed to ensure that all relevant stakeholders have had multiple opportunities to review and comment on the emerging Drayton Water proposals.

Stakeholders included, but were not restricted to, neighbouring residents, key local representatives and local community groups.

The consultation has been undertaken across a number of phases, which are described below:

Phase 1: Initial engagement, Autumn 2020 to Spring 2022

In autumn 2020, Obsidian Strategic (on behalf of DC Heaver and Eurequity) publicly confirmed its interest in promoting Site A8 (then known as Site AL3) through the emerging CDC Local Plan. Initial contact was made with District and County Councillors and Oving Parish Council, to inform them about Obsidian Strategic's early proposals.

In October 2020, Obsidian Strategic gave an initial online presentation of its vision for Site AL3 to Oving Parish Council.

Throughout 2021, Obsidian Strategic and its project team maintained close contact with Oving Parish Council, attending all relevant council meetings and other meetings focused on the emerging Oving Neighbourhood Plan and Design Code.

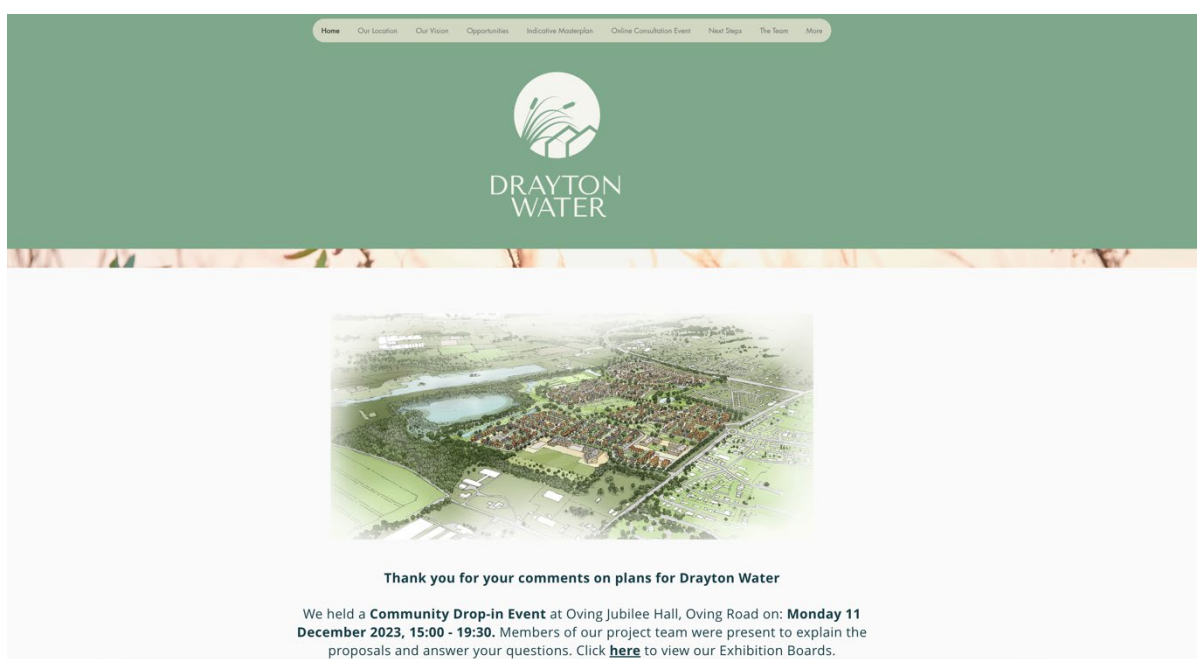
Website

In September 2021, a dedicated consultation website: <https://www.draytonwater.com/> was launched.

The website included information on housing need in Chichester, as well as the emerging plans for Drayton Water.

It also provided a response mechanism, allowing stakeholders to contact and ask questions of the project team.

This website has been regularly updated since September 2021 and has been extensively promoted in all communications with stakeholders. Since its launch, it has had 525 unique visitors.



Screenshot of our website homepage

Freephone and email

From late 2020, in all of our communication with local residents, we have advertised our contact details. Throughout the project, we have staffed a freephone number (**0800 319 6184**) between 09:00 and 17:00 Monday to Friday.

We have also offered residents a project email address (info@draytonwater.com), which has received various incoming emails and have advertised a Freepost address (**Freepost, Giveyourview**).

Phase 2: More detailed engagement, Spring 2022 - Autumn 2022

In Spring 2022, Obsidian Strategic unveiled its initial Masterplan for Site AL3, including more detailed proposals for Drayton Water, the first phase of development. 'AL3' was the policy title at the time of this meeting, and it has since changed to site 'A8'.

In addition to submitting an initial pre-application advice request to CDC, Obsidian Strategic informed all local stakeholders, and provided a briefing document [**Appendix ****] to Oving Parish Council.

Parish Council Meeting

In March 2022, Oving Parish Council discussed the AL3 proposals at its Full Council Meeting.

The Chair of the Parish Council explained the key elements of the masterplan. He noted that the site for the primary school is in phase 1 of the scheme, saying that this was 'quite unusual' and that most developers would wait until later in the programme.

He confirmed that Obsidian Strategic had offered to meet with the Parish Council to discuss the masterplan and he opened the floor to comments. A number of councillors stated their objection to the level of new housing development proposed for Chichester District, however most acknowledged that, while this opposition might lead to a reduction in housing numbers, it would not completely stop new housing developments. Against this background they recognised that site AL3 is identified as being suitable for development and noted that they should engage constructively with the consultation process.

The Chair of the Parish Council noted that he had already had a number of general comments about the draft Masterplan, and he provided these to the meeting. These comments/subsequent questions from councillors, were:

- Given that 940 new homes were proposed for the site, how does this work in terms of highways impact? (940 homes was what Chichester District Council had assessed as the site capacity at the time of this meeting)
- While the masterplan shows a landscape buffer along Drayton Lane, the tree belt here is not wide enough and needs to be increased in size, not only to create a buffer but also to protect the setting of listed buildings
- New roads etc need to align to create views to the Cathedral
- The proposed open space does not fully align with the location of existing mature trees and should therefore be amended to ensure that all mature trees are retained
- More information was sought about cycle and pedestrian routes around and into the site. A pedestrian/cycle route through the West Sussex depot onto Drayton Lane would be a good idea, it was suggested

- More thought needed to be given to how the green spaces within the site connect with each other and create effective corridors for wildlife movements
- More information was sought about drop off /pick up arrangements at the proposed new primary school. There was a concern that parents could cause congestion issues.
- It was suggested that, given there are already community facilities at Shopwyke Lakes and in Oving, site AL3 might not need any additional community facilities, and that any money set aside for these might be better spent on improving connections
- Confirmation was sought that the site will deliver compliant biodiversity net gain levels
- The provision of a pedestrian and cycle crossing on Shopwyke Rd 'by the Taylor Wimpey site' was proposed
- A cycle and bridle path linking the site to Oving village was considered to be essential
- Councillors asked why the site was not being accessed directly to/from the A27. Others suggested that it would be a good idea to consider a one-way system into the new development (i.e. one route in and a separate route out)
- It was felt that consideration should be given to a roundabout where the intersection of Shopwyke Road and Longacres Way will connect to our site
- Consideration should be given to providing a turning lane on Shopwyke Road for vehicles accessing the site at its most Northeastern intersection with Shopwyke Road (there is no longer vehicle access proposed at this point)
- Councillors asked about parking provision and noted that a policy compliant position would not be good enough and that more car parking should be provided

The meeting concluded with general discussion about new developments in the area, the capacity of local roads and their ability to cope with this new development. Again, councillors touched on the need for an entrance/exit to the site from the A27 and also, potentially, a southern exit onto Drayton Lane.

Parish Council workshop

Following this Full Council Meeting, Obsidian Strategic held a half day workshop session with Oving Parish Council in May 2022 on the initial Masterplan.

This workshop included a site visit, presentation on the emerging Masterplan and detailed discussion.

Subsequently, over the summer and into the autumn 2022, Obsidian Strategic amended its Masterplan to reflect comments received from stakeholders, including Oving Parish Council.

The key focus of these amendments were on:

- highways and connectivity
- the location of the two-form entry primary school and the community centre
- the proposed wildlife corridor
- the inclusion of a care home and extra-care facilities

- and developing a detailed drainage strategy.

Alongside this activity, Obsidian Strategic continued to have close contact with Oving Parish Council and to attend key Neighbourhood Plan and Design Code meetings.

Phase 3: Focused community engagement, Early 2023 – late 2023

Through the first months of 2023, the Obsidian Strategic team focused on developing its proposals for Drayton Water, to reflect the merging CDC Local Plan and specifically to respond to changes in the location of the proposed Strategic Wildlife Corridor which now covered the eastern part of the site, along Drayton Lane. As part of this, development was moved away from the lake, and access to the proposed SWC was restricted.

In addition to detailed and regular engagement with CDC and West Sussex County Council officers, engagement focused on other statutory stakeholders.

At the local level, Obsidian Strategic maintained ongoing engagement with Oving Parish Council and introduced itself and its proposals to the new District Councillors, elected in May 2023.

In September 2023, Obsidian Strategic and its project team gave an update presentation to Oving Parish Council, at which a revised site-wide Masterplan was presented.

At this presentation, Obsidian Strategic identified that the Masterplan would be submitted to CDC for consideration, and that an Outline Planning Application for the eastern element of the site (now known as Site A8), would be submitted following this.

Community Events

In December 2023, Obsidian Strategic held two well-publicised community engagement events focused on both the A8 site-wide Masterplan and the more detailed proposals for the eastern element (Drayton Water)

Drop-in Event

On 11 December 2023, an in-person drop-in event was held at Oving Jubilee Hall. Representatives from Obsidian Strategic (promoter), Quod (planning consultant), Carter Jonas (masterplanner), i-Transport (highways consultant) and Local Dialogue (community engagement) were present to explain the proposals and answer questions.

39 local residents attended this in-person drop-in event.

Your chance to comment on plans for Drayton Water

We expect to submit an outline planning application in the first half of 2024 for a residential-led development on part of a site allocated in the emerging Chichester Local Plan (Site A8).

Known as Drayton Water, our well-located site lies to the east of the A27 (Chichester by-pass) and immediately south of the Shopwyke Lakes development.

Our plans include:

- Approximately 370 new homes, including affordable homes
- Land for a two-form entry primary school and early years centre
- A 72-bed care home, including care and extra care suites
- 8 hectares of public open space
- 15 hectare Strategic Wildlife Corridor
- A new neighbourhood centre

We want to hear your views on our plans. See overleaf for how you can find out more.



Outline masterplan of the Drayton Water proposal

We are holding a **Community Drop-in Event** at Oving Jubilee Hall, Oving Road on:


Monday 11 December 2023, 15:00 - 19:30

Members of our project team will be present, to explain the proposals and answer your questions.

We are also holding an **Online Consultation Event** on:

Wednesday 13 December 2023, 18:00 - 19:00

You can sign-up for this online event via our website.



The green marker shows the location of our Drop-In Event

FIND OUT MORE
www.draytonwater.com 0800 319 6184 info@draytonwater.com

Leaflet publicising our drop-in and online events, sent out on the 24th November 2023

Promotion: the drop-in event was promoted by:

- A leaflet distributed to c1500 addresses within Oving Parish
- Email notification to:
 - Oving Parish Council, Tangmere Parish Council, Chichester City Council
 - Chichester District Councillors and West Sussex County Councillors
 - Chichester Society, Chichester BID and other amenity/business organisations
- Notification on the Shopwyke Lakes Facebook page (700 members)
- Information on the Drayton water consultation website (www.draytonwater.com)

Photographs taken at our drop-in event

The key issues raised during the drop-in event were:

Highways/connectivity

- Concerns about highways impact were raised by many attendees
- These concerns were both about local roads and the wider network

- Attendees questioned how local roads will cope. Attendees commented that Drayton Lane is already a rat-run and frequently jammed. Concerns were raised that Longacres Way, through Shopwyke Lakes, will have to carry too much traffic
- Some attendees stated that the wider highways network is already at capacity. There were lots of comments about the need to improve the A27.
- The exit from Shopwyke Lakes onto the A27 was considered by some attendees as already very dangerous
- Some attendees noted that several other developments are coming forward and asked if we have considered the cumulative impact

Environment/ecology

- Attendees generally welcomed the environmental/ecological credentials of the proposals
- The wildlife corridor was welcomed, with some attendees asking about management
- The intention to create a wetland edge to the lake - and for the lake to be focused on ecology, rather than leisure - was welcomed
- Some concerns were raised about the general loss of wildlife habitats in the area

Drainage/flooding

- Several attendees noted issues of poor drainage in the area, and asked what would be done on site to mitigate this
- Sewage treatment capacity was also raised by a number of attendees

Need

- Questions were asked about whether there really is a need for further development in Chichester – some homes at Shopwyke Lakes have not yet been sold
- If homes are going to be built here, what steps can be taken to make sure that they are affordable and available to local people
- Some attendees raised concerns that this development would mean that more settlements follow, and that Oving will not remain separate from Chichester's expansion

Primary school

- Comments focused on whether there is a need for a new primary school – with the suggestion that there is a greater need for a new secondary school
- What will be the catchment area of the primary school - is it mainly focused on the new families moving into Shopwyke Lakes?
- Some questions were asked about handling drop-off and pick-up

Local centre

- The need for a new local centre was questioned by some attendees, who pointed out that the new centre in Shopwyke Lakes is still predominantly empty
- Other attendees expressed a desire for a doctor's surgery/pharmacy as one of the community facilities offered
- Several attendees noted that the proposals should include a pub.

Care home

- A couple of attendees suggested that there was no need for an additional care home – the Chichester area is already well-provided
- Others asked about the accessibility of the assisted living facilities
- There was a request for the housing mix to include bungalow accommodation

Design/delivery

- The team were asked about when the project could be coming forward
- Questions were also asked about likely timescales for the SUEZ land (the south east element of Site A8)
- Several attendees sought reassurance that the scheme would be well designed and in keeping with the local Chichester vernacular.

General

- Some attendees asked whether this was the right location for additional development
- There was some disquiet about the overall scale of development in Chichester and the impact that this is having on the character of the district
- Questions about whether the proposals will include a Traveller site

The exhibition boards were uploaded to the Drayton Water consultation website.

Online presentation via Zoom

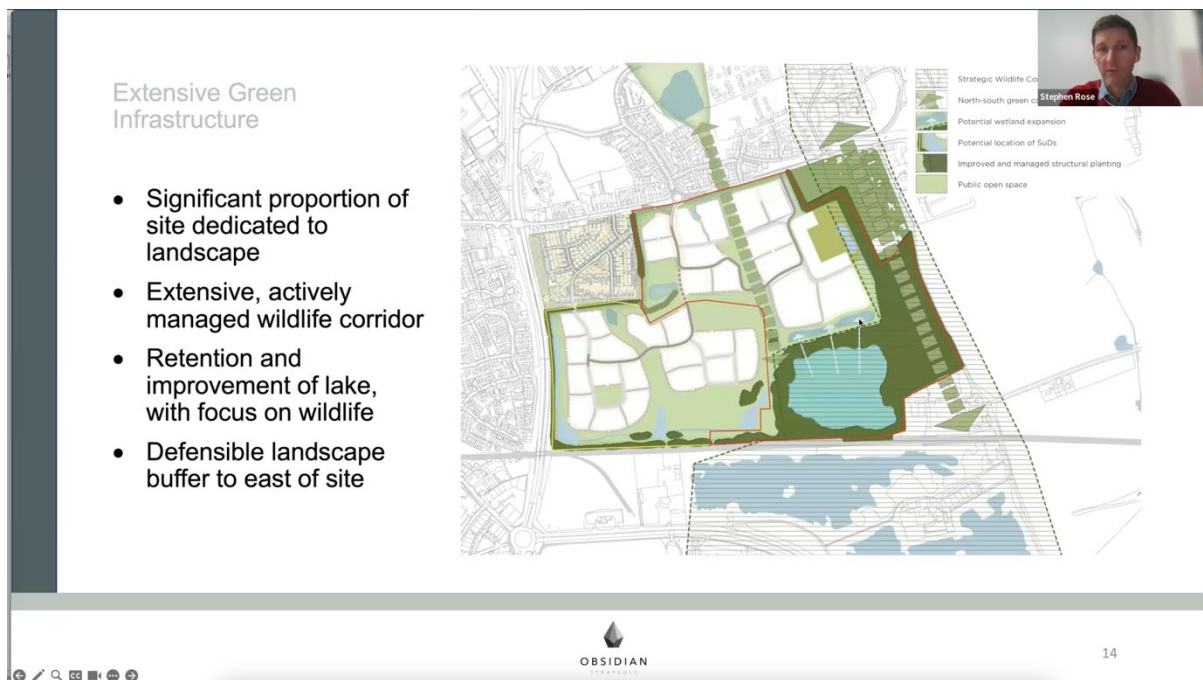
An online consultation event, via Zoom, was held on 13 December 2023. 6 local residents attended this event. Attendees included the local County Councillor and a Parish Councillor, living in/representing Shopwyke Lakes.

The key questions asked during this session broadly replicated those asked at the in-person event, although more focus was put on the sustainability credentials of the proposals, with a number of questions focused on heat pumps, solar panels etc:

- Questions about highways impacts, likely traffic volumes and specific off-site mitigation measures that could be considered
- Question about whether all the hard surfaces will be permeable to improve drainage and reduce flooding risk
- Clarification was sought on what facilities could be provided in the 'community centre'
- The anticipated parking standards for the development
- Clarification about current bus routes and the location of bus stops
- Questions about the likely catchment area for the new primary school

- Questions about construction impact, and particularly measure that will be taken to address noise and dust
- Reassurance sought that the ‘benefits’ of the masterplan will actually be delivered – with a questioner expressing some concern that if all the benefits were delivered by the SUEZ element, these might not materialise.

A recording of the online presentation and question and answer session has been loaded onto the Drayton Water consultation website.



Screenshot of Zoom presentation, showing the ‘Green Infrastructure’ slide

Phase 4: Ongoing pre-application engagement, 2024

Community engagement has continued throughout 2024.

As the Masterplan has evolved, the latest versions have been uploaded onto our consultation website.

In addition to maintaining contact with Oving Parish Council, the project team has been in regular conversation with the Chichester Development Trust (CDT), particularly regarding the newly opened community space in Shopwyke Lakes, to understand and strengthen Drayton Water’s integration into the local area.

The team has also contacted the emerging Shopwyke Residents’ Association, who are involved with the CDT.

In addition, we have continued to reach out to key stakeholders including, but not restricted to:

- Local councillors
- Chichester Society
- Chichester City Council
- Chichester Business Improvement District (BID)
- Chichester Development Trust (CDT)

Each of these stakeholders has been offered an opportunity to meet the Drayton Water team to discuss the project further. The Chichester Society has also been provided with additional briefing materials; however, they have indicated that they do not wish to meet the Drayton Water project team until after a planning application has been submitted.

Over this period, we have continued to monitor both our phone line and our email address. This ongoing engagement underscores Obsidian Strategic's commitment to creating meaningful connections with the surrounding community, and to engage in dialogue with local stakeholders.

Phase 5: Future engagement, 2024 and beyond

Obsidian Strategic is committed to ongoing engagement on the Drayton Water proposals with all interested stakeholders throughout the planning determination period (and beyond).

4. Responding to the emerging Oving Design Code

Throughout the consultation on Drayton water, the project team has carefully monitored the progression of the emerging Oving Design Code.

The project team has ‘audited’ the Drayton water proposals against the objectives of the Design Code, to ensure that the Drayton Water plans align with its guidelines:

1. **Design & Architecture:** Drayton Water embraces a blend of contemporary and traditional architectural styles, reflecting Oving’s commitment to maintaining local character and heritage. The project team has designed Drayton Water to complement the existing aesthetic and provide a cohesive look with the surrounding area.
2. **Landscaping:** The Drayton Water Masterplan features extensive green spaces and water features, carefully designed to boost local biodiversity and support sustainable drainage systems. Landscape architects working as a core part of the project team have sought to ensure that the Drayton Water proposals fully meet Oving’s landscaping principles.
3. **Sustainability:** Obsidian Strategic is committed to sustainability and the Drayton water proposals include innovative energy-efficient designs and the integration of renewable energy solutions. This approach reflects Oving’s sustainability objectives and includes features such as solar panels, rainwater harvesting systems, and high-performance insulation.
4. **Transport & Connectivity:** In alignment with Oving’s focus on enhancing connectivity, Drayton Water will include well-planned pedestrian pathways and dedicated cycling routes. The Masterplan promotes safe and convenient transportation options, encouraging a healthy and active lifestyle for residents.

Obsidian Strategic is continuing to monitor the progression of the Oving Neighbourhood Plan and will engage with its upcoming six-week consultation, which will take place in late 2024.

5. Summary of incoming contact

Throughout the consultation, an email and freephone line have been maintained in relation to the plans. Stakeholders have been able to share their feedback on the proposals, and many have done so. We have received **12 emails** and **4 calls**.

Comments in these communications can be summarised in the following categories:

Issue	Count
Traffic and infrastructure concerns	4
Development quality and impact on residents	4
Environmental concerns	2
Sustainability and ecology concerns/suggestions	2

Please note: a number of communications fit within more than one category.

We categorised each response as 'positive', 'neutral' or 'negative'. 9 were 'neutral', and 7 were 'negative'.

Traffic and Infrastructure

Concerns about traffic and infrastructure are frequently mentioned. Residents worry about the impact of the new development on already congested roads, particularly around the Chichester bypass. One resident raised concerns about the lack of pedestrian and bicycle paths, which makes the area dangerous for families. Another resident suggested adding a train stop to improve public transport and reduce traffic, showing that infrastructure improvements are crucial to the community.

Development Quality and Impact on Residents

The quality of the development and its impact on residents is another significant concern. One resident expressed interest in specific housing types, while another raised concern about the safety of building on a former landfill site, citing potential risks from chemical pollutants. Other residents requested access to detailed plans to better understand the implications of the development.

Environmental Concerns

Environmental issues, particularly related to wildlife and habitat preservation, are also a concern. One resident emphasized the need to protect local wildlife, highlighting the potential destruction of valuable habitats. There was also advocacy for sustainable development practices that preserve the environment.

Sustainability Initiatives

Sustainability is an important aspect of the development, with companies and residents showing interest in supporting green initiatives. The emphasis on environmentally friendly practices aligns with the community's values and the desire to create a sustainable living environment.

6 How the Drayton Water proposals have responded to stakeholder comments

From 2020 to late 2023, the masterplan for the site underwent continuous evolution, shaped by a deeper understanding of the site, developments in the local plan process, and early community engagement feedback.

In 2024, the masterplan was further refined, incorporating pre-application advice from CDC and input from other stakeholders. In particular, this has included 3 pre-app design meetings with CDC in 202, and a further pre-app meeting focusing on non-design matters. Our masterplan has responded to stakeholder comments in the following ways:

- Relocation of the community hub to move it closer to the easterly access from Shopwhyke Road.
- Relocation of the easterly site access further west along Shopwhyke Road to preserve trees and vegetation in this area
- Relocation of the care home create a cluster with the other community hub uses.
- Broadening of the green space onto Shopwhyke Road and retention of green space and trees along this boundary.
- Reworking of the housing parcels, including housing proposed at the north-east boundary of the site and experimenting with housing courtyards as a way of keeping road traffic away from the SWC.
- Allotments incorporated to the western boundary alongside the Redrow scheme.
- The primary school moved entirely out of the SWC.
- Location of the non-residential uses along the SWC boundary, to minimise light and noise pollution within the SWC. This included the allotments and school.
- Creation of a larger central recreation area including SuDS.
- The team provided an indicative layout of the school site, to demonstrate that it could accommodate the requirement level of development.
- Future access points for the remainder of the site allocation were agreed
- Straddling of the SWC boundary with SuDS, as it had been established that drainage features would not be incompatible with the SWC.

7 About Local Dialogue

Local Dialogue is an award winning, specialist public consultation agency with a wide expertise of advising on and implementing consultation programmes for both public and private sector clients.

Our extensive experience includes working with local authorities, housing associations and with private sector organisations on consultation, facilitation and communications for largescale planning applications, regeneration and development proposals.

We have a dedicated team of consultation professionals, based in London and Leeds and supported by an extensive network of freelance consultants.

8 Conclusion

The consultation for the Drayton Water development saw a range of responses from the local community, with a mix of neutral and negative feedback, largely from those with concerns about new development in the area. While some residents appreciated that the proposals addressed the need for affordable housing, especially for young first-time buyers, and supported the idea of designing new homes to reflect the Oving Design Code, several concerns were also raised.

Key issues highlighted during the consultation included worries about the unfinished Kingsbrook scheme nearby, potential loss of green spaces and public footpaths, traffic management challenges, fears that Oving could lose its 'separate identity,' and concerns about potential declines in property values. Although many villagers expressed concerns, much of the feedback was general opposition to new homes in the area rather than focused critiques of Obsidian's specific proposals for the Drayton Water site.

Overall, the consultation efforts by Obsidian Strategic and its project team have led to a more informed community that is now more aware of the details and intentions behind the proposals. The input from various stakeholders has been carefully reviewed and is reflected in the development plans, ensuring that community concerns are addressed while also meeting local housing needs.

9 Appendices

Removed for ease of circulation