

Examination of Chichester Local Plan

Vail Williams LLP Hearing Statement obo Wates Developments

Matter 6: Area Policies and Allocations

Issue: Are the proposed policies and allocations justified, effective and consistent with national policy?

This Statement seeks to respond to the employment site allocations under Matter 6 and should be read in conjunction with the Matter 4B (Employment) Statement which sets the basis for the below discussions.

Policy A20 land South of Bognor Road

Q.265 What is the justification for the specific development requirements at the proposed allocation?

Q.266 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?

The Land South of Bognor Road allocation is the only new site to be allocated for employment floorspace delivery through the plan period. This is explained and considered further through the Hearing Statement provided on Matter 4B.

For ease, questions 265 and 266 are answered together and therefore avoiding repetition.

This is a large site, the delivery of which may be delayed given that: The site is new to the Local Plan production process, at Regulation 19, and therefore has only been through limited consultation. We note the National Highways comments on the site (see highways section below) which if forthcoming earlier could have influenced the allocation approach.

- The land is Grade 2 agricultural land (according to Defra's Magic website) which is (a) in active use, (b) forms part of wider farmland which is proposed to be separated from the farm buildings therefore potentially limiting the effectiveness of the remainder of the farmland, (c) it conflicts with other parts of the local plan which promote protection of the best agricultural land and food production.
- There are several site constraints to delivery to the allocation including a countryside location, flood risk, highways and landscape impact, which may affect timely delivery

LISTEN

CARE



INNOVATE

LEAD

- The Policy also seeks to provide plots for Gypsy and Travelling Showpeople alongside the employment provision and it is not clear whether these two elements can be delivered independently or via linked works e.g. access etc... This raises a deliverability concern.

Land South of Bognor Road – Policy A20 – Agricultural Land

The Land South of Bognor Road site is both grade 2 agricultural land (the best value) and in active food production. Development on this site would raise conflict with other Local Plan approaches and policies as follows:

- The proposed Local Plan at Paragraph 4.8 states that: The council will seek to protect the best and most versatile agricultural land from large scale, inappropriate or unsustainable non-agricultural development proposals that are not in accordance with the Development Plan.
- **Policy NE2 Natural Landscape** Development of poorer quality agricultural land is fully considered in preference to best and most versatile land Grades 1, 2 and 3a.
- **Policy NE10 Development in the Countryside** The proposal is complementary to or compatible with its countryside location and does not prejudice any viable agricultural operations or other existing viable uses.
- The National Planning Policy Framework (paragraph 174) and Natural England’s Guide to assessing development proposals on agricultural land (2021) promotes recognition of the value that best and most versatile agricultural land can provide.

Land south of Bognor Road - Policy A20 – Site Constraints impacting Delivery

Flood Risk

Policy A20 supporting text paragraph 10.87 outlines that parts of the site are at risk of surface and ground water flooding which would need careful management.

Highways

To facilitate development of Policy A20 the supporting text paragraph 10.87 identifies the need for realignment of Vinnetrov Road and works to the Bognor Road roundabout as part of a package of A27 improvements. It is understood that National Highways have pulled funding for these improvements and that they are to be delivered through a tariff on strategic sites. Therefore, the delivery of this site is reliant on the delivery of other strategic sites and raises concerns around timescales and deliverability.

The National Highways’ representations on Policy A20 (Employment Land South of Bognor Road) are also notable and state: “The planning of this site is dependent on considering a number of site-specific issues including the need for realignment of Vinnetrov Road and works to Bognor Road

Roundabout as part of a package of A27 improvements. The A259 Bognor Road/Vinnetrow Road Link is safeguarded (as shown in the Transport Study 2023) to ensure that the A27 improvements can be delivered, unless it can be demonstrated that they are no longer required. We seek to understand what happens if this is not delivered or can't be funded."

Q.267 Are the suggested MMs necessary for soundness?

We have no comments on the suggested MMs in relation to Policy A20

However, as set out in our Matter 4b Statement we consider that further Minor Modifications are recommended in terms of providing additional allocated sites and therefore removing the reliance on a single new allocation to meet the needs of the District

The other allocations carried over from the current Local Plan obviously do assist in meeting need but as explained through the Hearing Statement on Matter 4B these are old allocations that have not come forward since their allocation nearly a decade ago.

Our hearing statement focus has been to ensure that the Local Plan Examiners are aware of the concerns held over reliance on a single new allocation, that does not (on it's own) meet employment needs. To have a more robust Local Plan, to meet employment needs, additional sites should be identified.

Additional allocated sites would enable the employment floorspace needs to be more readily provided for along with also enabling needs to be met sooner than the Land South of Bognor Road is likely to come forward.

It is considered that the employment strategy within Chapter 7 of the proposed Local Plan is not **justified** as it is inappropriate as it relies on a single new site, with multiple issues some of which are in conflict with other parts of the local plan.

The allocation of Land South of Bognor Road alone is not considered **effective** in terms of soundness of policy given the risks surrounding the allocation of a single, large site.

In order to achieve a sound Local Plan in terms of employment allocations more sites should be allocated to increase deliverability and this would also hopefully enable market needs to be met sooner in the Local Plan period.