

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

17th March 2023

Dear Sir/Madam,

Chichester District Council - Reg. 19 Local Plan Consultation - Land at Salthill Park

These representations are made on behalf of our client, the Salthill Trustees who wish to object to policy NE4 of the Chichester Local Plan 2021 – 2039 Proposed Submission Regulation 19 Version.

Background

Our clients own approximately 80 acres of farmland at Salthill Park which is edged red at enclosure 1. The land has been promoted at all relevant opportunities to Chichester District Council but wish to confirm to Chichester District Council and the Inspector that the land is available for development.

Site suitability

The land is edged red in Appendix 1 of this statement and is identified as land east of Salthill Road. The reference in the HELAA is HCC0039. The land is outside of any flood zones, is flat and approximately 32 hectares in size. The land has no significant natural constraints other than an area subject to a Tree Preservation Order that adjoins the site to the northeast and the reference for this is 58/00137/TPO. Located outside of the submitted red line plan, is Salthill House itself, which is a Grade II listed building. Although these constraints don't effect development on the site, they would be considered in the design phase.

The land immediately adjoins site allocation A6 West of Chichester for 1,600 units. Phase 1 of this land now has detailed permission, whilst the reserved matters for Phase 2 is being considered by Chichester District Council. In addition, we are also promoting part of an additional parcel of land to the south of this which is referenced HCC0038 in the HELAA.

Policy NE4

The policy is considered to be unsound, inconsistent national policy and is unjustified.



The owners object to these Strategic Wildlife Corridor (SWC) locations. The Council has not published its evidence base in the Regulation 19 consultation version for applying this new constraint layer. It states 'significant habitat surveys, data collection and evidence gathering to enable the mapping of the proposed corridors' has been undertaken, but it is not available to review for the Regulation 19 consultation.

Nor do the Council state the current use of these corridors, some are arable farmland and therefore do not necessarily present the best place for blanket 'additional layer of planning restraint' wildlife corridor. The Council have also not considered that these sites could have future development potential and maybe some of the better and more sustainable (with minimal other constraints) for future development in terms of sequential testing and are therefore precluding sustainable future development in these locations without having undertaken a proper assessment of all sites in the District.

The built environment and nature can work in unison and doesn't require blanket policy designations. Furthermore, the Council have not fully set out the methodology for applying a blanket 'strategic wildlife corridor' at the locations it proposes in the changes to the policy map. The Council have not fully consulted those affected by SWC and other stakeholders. The Council is further applying yet another restrictive 'additional layer of planning restraint' in a District which is already highly constrained, for example AONB, extensive areas covered by a National Park, the District contains large numerous ecological designations SSSI/SPA, Local Nature Reserves/National Nature Reserves and Nutrient Neutrality applies.

Accordingly, this further constraint, which appears to be located in areas adjacent to the existing settlements, where logically future periods of Plan growth would be located, appears unjustified and inappropriate in its current form.

We trust our comments will be considered as part of the Local Plan review, and please do not hesitate to make contact if you require anything further.

Yours sincerely

Chris Locke Henry Adams

Henry Adams LLP



Appendix 1



Henry Adams LLP

Sales ▶ Lettings ▶ Commercial ▶ Rural ▶ Development ▶ Fine Art