



## Representation Form

### Local Plan Review: Preferred Approach Consultation

The consultation on the Local Plan Review: Preferred Approach will run from 13 December 2018 to 7 February 2019. The document and more information on the consultation can be viewed on our website [www.chichester.gov.uk/localplanreview](http://www.chichester.gov.uk/localplanreview)

**All comments must be received by 11.59 pm on Thursday 7 February 2019.**

There are a number of ways to make your comments:

- Comment on the document on the internet using our online consultation website [www.chichester.gov.uk/localplanreview](http://www.chichester.gov.uk/localplanreview) (**Recommended**)
- Complete this form on your computer and email it to us at [planningpolicy@chichester.gov.uk](mailto:planningpolicy@chichester.gov.uk)
- Print this form and post it to us at: Planning Policy Team, Chichester District Council, East Pallant House, 1 East Pallant, Chichester, West Sussex, PO19 1TY

#### **How to use this form**

Please complete Part A in full. Please note anonymous comments cannot be accepted, a full address including postcode must be provided.

Please complete Part B overleaf, using a new form for each separate policy or paragraph that you wish to comment on. Please identify which paragraph your comment relates to by completing the appropriate box.

For more information, or if you need assistance completing this form, please contact the Planning Policy Team by email at [planningpolicy@chichester.gov.uk](mailto:planningpolicy@chichester.gov.uk) or telephone 01243 785166.

<b>PART A</b>	Your Details	Agent's Details (if applicable <sup>1</sup> )
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Is this the official view of the organisation named above? Yes  No

<sup>1</sup> Where provided, we will use Agent's details as the primary contact.

## PART B

Please use a new form for each representation that you wish to make. Please note anonymous comments cannot be accepted. Any personal information provided will be processed by Chichester District Council in line with the General Data Protection Regulations 2018. More information is available at:

<http://www.chichester.gov.uk/dataprotectionandfreedomofinformation>.

To which part of the document does your representation relate?

Page/ Paragraph Number:	110	Policy Reference:	AL6: Land South- West of Chichester
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Do you support, object, or wish to comment on this policy or paragraph?  
(Please tick one answer)

Support

Object

Have Comments

Enter your full representation here giving details of your reasons for support/objection:

### **Policy AL6: Land South-West of Chichester (Apuldram and Donnington Parishes)**

- 1.1 The Preferred Approach Local Plan proposes a new strategic employment land allocation of 85 hectares to the south west of Chichester (Policy AL6), to include approximately 33 hectares of employment land (suitable for B1b, B1c, B2 and B8 uses), at least 100 dwellings and a managed country park. Development of this site would require "a new link road to be provided between the A27 Fishbourne roundabout and the [A286] Birdham Road to mitigate the in-combination impact of the development planned for in this Plan" (see paragraph 6.49). Other requirements include the need to demonstrate that sufficient capacity will be available within the sewer network, including waste water treatment works, to accommodate the proposed development.
- 1.2 The land south-west of Chichester is proposed to accommodate a mix of uses which has yet to be determined. It is acknowledged that the impacts of the development (including landscape, flooding and transport) and its commercial attractiveness will need to be "tested further as this Local Plan Review is prepared" (paragraph 6.47).
- 1.3 The proposed strategic site allocation AL6 is therefore subject to significant technical and environmental constraints and is dependent on provision of a new link road for strategic access, which we understand is currently unfunded. We consider that the deliverability of the proposed employment land allocation of 33 hectares has yet to be properly established.
- 1.4 Even without these constraints the proposed strategic site allocation AL6 would not fulfil R-RMC's requirement for strategic expansion land for the following reasons:
  - It is remote from the existing Goodwood site and from R-RMC's logistics facility at Bognor Regis;
  - The only truck route between AL6, Goodwood and Bognor Regis is along the heavily congested A27;
  - The "early phase" employment provision is aspirational and requires further testing;
  - The required new link road is subject to a transport assessment and funding being secured; and

- The potential “abnormal” site costs are currently unknown, including contributions to an increase in the capacity of the sewer network and environmental impact mitigation.

1.5 We note that the Chichester HELAA methodology (March 2018) established the additional suitability criteria to be considered specifically in relation to the suitability of a site for economic development. The following suitability criteria are relevant in the context of our comments on Policy AL6;

- *Whether the site has / can gain good access to the strategic transport network;*
- *Whether the site adjoins / could adjoin part of an existing employment site.*

1.6 Paragraph 5.18 of the HELAA Methodology goes on to state that:

*"Sites that have potential for economic development will normally be considered suitable where there is good access to the strategic transport infrastructure, services and facilities or where the site adjoins part of an existing employment site."*

1.7 The detailed site assessment form for South-West of Chichester (HAP0003) included in Appendix 4 of the HELAA August 2018 states that:

*"The northern part of the site adjacent to the A27 and east of Donnington may be suitable for employment uses subject to access and other considerations."*

1.8 These comments on the suitability of the Plan’s largest proposed strategic employment site for B1, B2 and B8 uses underline the uncertainty regarding the deliverability of this proposed allocation and adds weight to the need for a separate and bespoke employment land allocation adjacent to the existing R-RMC facility at Goodwood.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

2.1 Our representation on Policies S3, S8 and DM9 include proposed changes to the Local Plan.

(Continue on separate sheet if necessary)

### Declaration

I understand that any comments submitted will be considered by Chichester District Council in line with this consultation and will be made publicly available on their website [www.chichester.gov.uk](http://www.chichester.gov.uk) and may be identifiable by my name or organisation, if provided.

Name ( <i>print</i> ):	Sheila Keene
Date:	07 February 2019