

Examination of the Arun Local Plan (ALP)

Agenda for the hearing session on 3 June 2015 (AM)

Issue 3.2: Enterprise Bognor Regis (EBR) - covering the relevant parts of ALP part 7 (policy EMP DM2) and part 8.5 (policy EMP SP2)

Note: Discussion will cover only the site-specific merits/demerits and deliverability of the EBR proposals. Wider aspects of ALP part 8 (employment and enterprise) will be covered after the Council's pending reconsideration and clarification of the District's position on 'objectively assessed housing needs' (OAN) and the implications of that for the future of the plan as a whole.

The following topics will be discussed in sequence. When the Inspector is satisfied that he has obtained the information he needs on each topic he will move the discussion on to the next topic.

1 Are the proposals for EBR justified by a convincing evidence base?

1.1 The economic rationale of EBR

Is there a justified economic rationale for EBR as a strategic allocation? Do the sources quoted in ADC response paper for matter 3 at paras 3.2.4 & 3.2.5, including the ALP Validation Study on Economy and Enterprise (PE PP1) together justify the need for, and value of, the allocation in economic terms?

1.2 Environmental questions: Representations concerning these focus on (a) flood-related questions and (b) the nature conservation interest of the EBR sites.

1.2A Is there an over-arching strategy for addressing flood-related issues for the whole site? Has such a strategy been agreed with the Environment Agency? Is the flood mitigation scheme in the planning permission for Oldlands Farm part of that planned over-arching strategy?

1.2B Is there an over-arching strategy for ensuring 'no overall loss of biodiversity' (see EMP DM2e) or is each phase of development to be judged independently in this respect?

Note: As identified at 8.5.11 the area between the A259 and the Bognor Regis Northern Relief Road is an area of wildlife interest identified in ALP as a 'biodiversity opportunity area' (BOA) although rep EMP DM2 290 by Bersted PC claims that Salt Box and Rowan Park are of arguably greater importance. EMP DM2(e) also appears to ascribe importance to 'the area', plainly referring in this context to the whole of the EBR area.

Can it be confidently concluded that the quantity of development planned at 'Former LEC Airfield and adjoining land' (table 8.3), together with the land-take for the new road, will be compatible with ALP's aims for the BOA?

2 Are the EBR allocations likely to be viable and deliverable within the plan period – are they ‘effective’ in soundness terms?

I note that there have been long-term discussions between the major stakeholders here, including the LEP, that construction has commenced at Oldlands Farm Phase 1 and that work is well advanced on finalising the first of the two proposed Local Development Orders.

2.1 Is there an agreed overarching delivery mechanism (or a reasonable prospect of one being concluded) which will (a) involve all the landowners and any other major stakeholders and (b) guarantee appropriate and proportionate sharing of all the required infrastructure investments and access rights needed to complete the whole development to an overall master plan, thereby giving confidence that EBR could be completed over the plan period (subject of course to demand)?

2.2 Development of LEC Airfield is clearly seen as a later phase requiring its own infrastructure provision including the provision of the road link forming ALP proposal SP3(e). [The Enterprise Bognor Regis Highway Infrastructure Viability Study (PE CP2) estimates the costs of the road infrastructure at £11.3m (option1) or £17.8m (option 2) describing them as ‘challenging’. This appears to differ substantially from the cost of £7.1m for the ‘safeguarded alignment’ quoted in ALP 8.5.11. Sime Darby also raises the question of whether or not the plan is clear on the nature of this road and seemingly by implication how it is to be funded - see their suggested change to ALP 15.3.4.] Is ALP clear and effective on these points?

2.3 Phasing What areas are covered by respective phases 1 and 2 of Oldlands Farm, Salt Box and LEC Airfield in ALP 8.7.7? A simple plan to illustrate these areas would be helpful. To what extent is this phasing ‘indicative’, as stated in 8.7.8? Is this description compatible with 8.7.9 which seems to say that a departure from the phasing would require ‘exceptional circumstances’? Are the 3 phases merely an indication of the order in which development is thought most likely to occur in terms of present expectations of market demand and likely future infrastructure availability, or is it in some way partly policy-driven?

2.4 Is relocation/development of Bognor Regis Golf Course necessary to ensure funding of the road infrastructure for the LEC airfield site (rep PUB-TSP3-508)? The ADC response statement (at 3.2.23) indicates that this question cannot be answered until the exact position and form of the northern tie-in road (T SP3e) is known.