



CONTEXTUAL NOTE: CONSULTATION ON CHICHESTER LOCAL PLAN 2021-2039: PROPOSED SUBMISSION UNDER REGULATION 19 OF THE TOWN AND COUNTRY PLANNING (LOCAL PLAN) (ENGLAND) REGULATIONS 2012

OVERVIEW OF SUBMISSIONS BY KINGSBRIDGE ESTATES LIMITED AND LANDLINK ESTATES LIMITED

17 March 2023

On behalf of our clients Kingsbridge Estates Limited and Landlink Estates Limited, I am pleased to make representations on the Chichester Local Plan 2021-2039.

This letter is intended to support and provide an overview of the detailed representations that have been lodged via the consultation portal on the Chichester District Council website, and as such should be read in conjunction with these representations and The Sector Review and Economic Benefits Statement (SREBS) produced by Savills Economics Research.

The Runcton Horticultural Development Area (HDA)

The horticultural industry is a well-established and successful indigenous industry in the south of England. The Coast to Capital Local Enterprise Partnership (LEP) estimates that the industry employs upwards of 9,000 FTE jobs providing in excess of £1 billion production.

An especially high concentration of the constituent elements of the industry are located within the administrative boundary area of Chichester District Council, which identifies a hierarchy of four key horticultural development areas. Runcton Horticultural Development Area (HDA) is identified as one of only two sites within the Chichester District that is suitable for delivering large scale horticultural growth.

The Runcton HDA, of which Chichester Food Park forms a key part, comprises a cluster of the key elements of the horticultural economy in Chichester and provides in excess of 550,000m² of floor space in use for horticultural and affiliated purposes.

Every effort should be made during the plan period to accommodate efficiencies that will improve the competitiveness of the food cluster in the interests of promoting local economic growth and job creation, foster more environmentally sustainable ways of working, and enhance the resilience of the UK food supply. Given the existing concentration of food production activity within the Runcton HDA, future growth of the industry will be heavily reliant on existing business located within the Chichester Food Park.

Kingsbridge Estates Limited and Landlink Estates Limited

Kingsbridge Estates Limited and Landlink Estates Limited are the two main owners of land within the Runcton HDA. As landowners, both companies have a demonstrable track record in supporting the growth of the local food production industry over the course of the last 20 years. They have previously submitted

representations to the 2018 draft Local Plan in connection with proposed policies of relevance to horticultural employment and the contribution of the HDAs to the local Chichester Economy. Kingsbridge Estates Limited and Landlink Estates Limited have a very clear understanding of the immediate and future needs and evolution of the food production industry and are resolute that (a) the policies within the current adopted local plan have acted to suppress growth and efficiency of the local industry, and (b) the realisation of future market demand in accordance with sustainability obligations will increasingly rely upon smoothing out the transition of produce ‘from field to fork’. The representation we have made reflect this understanding.

Summarised Representations on Chichester Local Plan 2021-2039.

The economic significance (both current and future potential) of the food production industry within Chichester to the local, regional and national economy is clearly acknowledged within the Council’s evidence base, particularly the 2018 and 2020 HEDNA documents. The significance of the industry more generally is also acknowledged in various governmental, industry and third-party reports. Accordingly, these representations seek to assert that the findings of these research reports, in addition to the Savills SREBS, must inform the Council’s Local Plan submission to the Secretary of State in order to demonstrate that the Local Plan submission meets the definition of ‘sound’ as outlined within paragraph 35 of the NPPF.

Identified need for functionally-linked development

The principal concern with the proposed approach to the Runcton HDA detailed within the Chichester Local Plan is the wording of planning policy E4 (Horticultural Development) and the associated supporting text. This policy seeks to support the delivery of new horticultural and ancillary development only, and fails to support the delivery of development that is functionally-linked to the horticultural industry. Such development is necessary to foster and maintain the growth and competitiveness of a world-class food cluster.

Chichester Food Park has gone from strength-to-strength in recent years and now comprises a range of businesses that supply fresh produce nationally. While the focus of the Runcton HDA remains centred on food production, there is a demonstrable business need to deliver functionally linked developments to support the overall vitality and viability of Chichester Food Park. Such developments include, but are not limited to, storage and distribution facilities, food processing and packaging, research and development, and renewable energy/energy hub.

The siting of functionally associated developments within the Runcton HDA would facilitate locational synergies such as reduced transaction costs and knowledge spill-overs, enabling local businesses to establish more efficient vertically integrated value chains. Such approaches have been adopted by other LPAs nationally, such as the Holbeach Food Enterprise Zone in South Holland, Greater Lincolnshire. It is paramount that a similarly facilitative and flexible planning policy approach that allows functionally associated uses within the Runcton HDA is established if Chichester’s horticultural industry is to remain nationally competitive and realise national and local carbon reduction ambitions.

The benefits of siting functionally linked uses within the Runcton HDA are not, however, limited to harnessing the economic potential of the food cluster. It will also significantly reduce vehicular movements that would be associated with the movement of raw materials and prepared products. The Savills SREBS references a pre-application enquiry in which the benefits of an on-site storage and distribution hub within the Runcton HDA was forecast to reduce mileage by 84,000 per annum. This considerable mileage saving would both assist in reducing greenhouse gas emissions in line with the Council’s environmental policies

and assist in achieving the Government's net zero targets. Furthermore, previous research into the benefits of an on-site storage and distribution hub have been estimated to reduce vehicular movements associated with the Runcton HDA along the A27 by 6%. This is a significant benefit when considering the acknowledged constraints associated with the A27. The realisation of that distribution hub proposal was obstructed by the restrictions of the current adopted local planning policies applicable to Runcton HDA.

Notwithstanding the benefits associated with the colocation of functionally linked facilities within the Runcton HDA, the need for such development to be delivered within the Runcton HDA also arises from the 'extremely undersupplied' commercial property market (HEDNA 2022). It is not considered that the employment allocations proposed within the Local Plan will address this substantial unmet need; indeed, a number of the employment land allocations are not preferentially sited relative to the Runcton HDA. This undersupply of commercial property is likely to continue to have a significant impact upon the ability of the industry's requirement for functionally linked commercial premises that are necessary to maintain competitiveness.

What is fundamentally needed is a policy approach that allows for the development of functionally linked development at the Runcton HDA. This would provide greater certainty to horticultural businesses that the demonstrable need that is currently unmet by the market can be delivered within the Chichester District.

The restraint of the Pre-submission Draft Local Plan on development that is functionally linked to the horticultural industry within or close to the designated HDAs will suppress the productivity and prosperity of the industry and thereby its significant contribution the wider local economy.

Requirement for land within the HDAs to be utilised first

The requirement that land within the HDA should be used first (in advance of 'other' land') to accommodate all forms of new horticultural development, albeit with caveats, does lack a progressive planned approach to the delivery of the range of development and infrastructure necessary, in the right locations, to realise the potential of the industry.

The Council's approach to HDAs correctly acknowledges the hierarchy of HDAs, with Runcton HDA a focus for large scale horticultural development. The terms of the policy imply that all of the allocated land in all four HDAs would need to have been saturated before development outside any one of the HDAs would be permissible. This would fail to acknowledge the specific locational needs of the operations and businesses occupying each of the HDAs and should be amended.

The requirement for development to demonstrate why it cannot be accommodated within the HDAs fails to take into consideration that the plan itself expects that approximately two-thirds of horticultural development across the Local Plan period will need to come forward outside of HDAs. Accordingly, the Council should plan positively for this growth by taking a sequential approach to horticultural development that includes provision for associated and functionally-linked development in the right way.

It is suggested that the Runcton HDA should therefore be the focus for functionally linked horticultural development – a horticultural/food cluster or hub. This in turn may require that the core "growing" elements of the Runcton HDA are delivered in proximity to, but outside of, the HDA, and the land within the HDA focussing on the more intensive features of food production and functionally linked activity. Evidence shows that prioritising the siting of functionally-linked development within The Runcton HDA will encourage benefits associated with agglomeration and colocation. Please see attached Savills SREBS for more details.



Requirement to protect the character and appearance of the surrounding countryside

Criterion 5 of Draft Policy E4 seeks to preserve the rural character of the surrounding areas. However, the purpose of the HDA designations at Runcton is specifically to accommodate and consolidate development at scale. Developments previously granted consent at Runcton HDA have already created a general urbanised character. It is therefore suggested that the Runcton HDA should be the focused for functionally linked development in order to minimise landscape impacts. By consolidating development in this form, the aim of preserving the amenity of the surrounding countryside may be better realised. It is therefore important that Criterion 5 does not act to obstruct the clear ambition of the policy which is to facilitate growth by accommodating larger scale development.

Suggested amendments to the regulation 19 Chichester Local Plan 2021-2039

In order to address the above limitations of the Regulation 19 Chichester Local Plan, the following modifications are suggested:

- Change the term 'ancillary' to 'functionally linked' within the context of permissible horticultural activities. This will allow for the development of logistics, research and development, processing of the food produced at the site, and associated businesses and functions. This is essential to maintaining the competitiveness of the food cluster both at a national and international level.
- Adjust the terms of the policy E4 so that the rational and effective location of horticultural and functionally associated development outside the HDAs is not obstructed if alternative space remains within any of the designated HDA.
- Modify the terms of criterion 5 of Policy E4 to acknowledge that making the most effective use of the designated HDAs for their intended purpose may have some landscape impacts, which should be accommodated here in order to protect the character of the wider undesignated landscape.

With these changes, the Local Plan would perform better against the 'positively prepared', 'justified', 'effective' and 'consistent with national policy' tests of soundness outlined within the NPPF and enable the delivery of sustainable development that meets the identified needs of the horticultural employment sector.

Summary

For the reasons set out in this letter, and within both the representations made via the Council's online consultation portal and within the Savills SREBS, the Regulation 19 Chichester Local Plan does not comply with the soundness tests outlined within the NPPF.

In advance of the Local Plan proceeding to examination, our clients would welcome the opportunity to discuss the contents of this representation with the LPA and to advise on minor modifications that could be agreed.

Rob Henderson

March 2023