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10th January 2023

Andrew Frost
Director of Planning and Environment
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Dear Andrew

Chichester Local Plan Review 2023

Initial comment by The Goodwood Estate

The Estate has found the regular meetings with the Council both helpful and reassuring that we share similar goals in ensuring the areas prosperity is sustained and enhanced. The local plan is interconnected with all activities at the Estate and will therefore be integral to what the Estate wishes to achieve in the future. The economic prosperity of the Estate and consequently that of the District, is inherently interlinked with emerging planning policy, and we are very keen to assist the Council in its promotion of the Local Plan Review; offering support where we can and suggesting modifications where we believe the plan can be improved.

Following our discussions and requests from both CDC and SDNPA for clarity on what the Estate proposes by way of future development, the Estate is to assemble a document covering each of its business areas and identifying likely physical requirements which may touch on planning requirements.

The Estate has assembled a considerable amount of background evidence and information to inform the document, such as trees, ecology and environment, drainage, ground waters, and is utilising this information to instigate Estate-wide environmental improvements. This approach will be material to future development proposals (by the Estate or others) and therefore when prepared, we will be very happy to share it, and the background information, with you as we are intending that it should align closely with the objectives and intent of the local plan. Consequently, we are hoping the local plan draft, when published for consultation will respond positively to the Estate's ambitions we have set out during our meetings.

Economy

We have shared with the Council a report The Estate commissioned from the London School of Economics. We referenced the document during the recent Madgwick Lane appeal, and again with the Council's economic development team.

The report provided evidence to support the well-recognised fact that the Estate is a major contributor to the economic well-being of the District and surrounding area, and coupled with Rolls-Royce, which occupies Estate land and from which relationship that company draws strong marketing elements, jointly comprises the largest contributor.

We are looking to the local plan to reinforce that evidence and include policies which seek to protect and enhance that economic benefit. We are looking to the plan to offer in principle support for proposals by the Estate which enhance its business base, subject to the due consideration of material planning considerations, but also provide a level of flexibility to allow the Estate and its business interests to respond quickly to change circumstances or new opportunities. Although the support of the planning authority is acknowledged, there have been times when the planning process itself simply cannot provide the flexibility needed.

The planning permission for use of the motor circuit is a good example. Although we worked with the Council to offer a planning permission which provides as much flexibility as possible while retaining an appropriate level of control to respect living conditions of neighbours, it cannot provide the day to day flexibility that is often required. We have often discussed with the authority an annual quantum of noise/activity applicable to the site's use that can be 'sliced up' according to daily need but we have yet to find a form of permission that is workable. Looking to the future we know that permission will require renewal to respond to changed market conditions and we are looking to the local plan to set out an over-arching understanding from which a new permission will receive direction.

The Estate has a number of business centres, which are affected similarly; hospitality and events, sports, hotel, farming and forestry, circuit, aerodrome etc. which are focussed on a specific site or buildings. We are looking for the plan to recognise these business areas and to offer the flexibility of appropriate use. In addition we are seeking protection within the plan from inappropriate development near or adjacent to those centres, which could give rise to a forced change in operations to the detriment of Estate business generally. Any application proposed in a location that could give rise to operational changes, should be required by policy to demonstrate, with evidence, that the development will not be adversely affected in accordance with the agent of change principle (currently set out at paragraph 186 of the current NPPF).

Circuit and Aerodrome

Of all of the Estate's business centres it is the circuit and aerodrome that is fundamental to much of what the Estate does. The motor circuit is a major component of the business of the Goodwood Estate, which is a major contributor to the local economy. Protecting its interests should be a key element of the Local Plan Review if it is to truly support local business. It is also the area which is most susceptible to planning impacts, as demonstrated by the issues arising from new housing proposed and developed in close proximity. Matters which will have to be addressed increasingly by the Estate and planning authority in the coming years.

Housing and a motor circuit/aerodrome are not good bedfellows, and we are already receiving and anticipate very many more objections from residents of new housing, requesting changes to our operating practices. We have raised, and will continue to raise our concerns, at the potential adverse impact on Estate operations and therefore its economic base, from inappropriately located development. Without a local plan policy which recognises the importance of the circuit and aerodrome to the economic vitality of the District. Our concerns seemingly are pushed aside too easily by developers promising safeguards and mitigation to gain consent for reason of housing shortages, that are accepted by decision makers. We then face the predicted objections when those safeguards are not presented or residents simply do not know or appreciate the situation within which their property is located.

In addition to recognising the economic importance of the motor circuit and aerodrome, there are therefore two other aspects we wish the local plan to address; the safeguarding of the circuit and aerodrome from inappropriate development, and increased flexibility in their operation.

It was a great disappointment to the Estate that the speculative housing development north of Madgwick Lane and adjacent to the Motor Circuit, was allowed at appeal, despite the best efforts of both ourselves and the Council to make a strong counter case. Ultimately, the decision was described as finely balanced with the

Inspector, erroneously in our view, taking the side of housing provision over other local material considerations. We continue to believe that decision was not sound, with the Inspector placing too great a reliance on 'evidence' presented by the appellant.

We strongly believe the information provided about aircraft movements and aircraft safety, particularly helicopters, was inaccurate and misleading, and we continue to have very real concerns for the development's impact on Goodwood operations. Despite the appellant's assurances at the Public Inquiry, we believe the living conditions of future residents will not be reasonable due to our operations, and we continue to have concerns for aircraft safety with housing to be located within the only open space available near the site in an emergency situation. In fact, this matter is so significant that a major tenant at the site has raised concerns about his continuing operation because of safety fears for his aircraft and pilots. It is a clear demonstration of "the agent of change principle" which was raised at the Inquiry but for which no evidence was then available.

Although planning permission in principle, was granted following the appeal, we will continue to raise concerns as the design work progresses, to ensure that all assumptions and assurances made at the inquiry are carried through into the detailed application and ultimately delivered. We have significant reservations that the detail submission(s) will deliver all that was promised; the site will be a standard development of volume housing that incrementally removes all elements that make it acceptable or seek to protect the reasonable living conditions of future residents, in the same way has occurred at Madgwick Park.

In addition to acknowledging the existence of the aerodrome and circuit, we are therefore looking to the Local Plan to acknowledge the relationship of the site to surrounding land uses, in particular the housing that exists and that for which permission has been granted. In so doing, reinforcing the fact that the circuit and aerodrome has existed for many years before much of the housing was built. Consequently, when considering any new development proposal potentially affected by the circuit and aerodrome, such proposals must demonstrate that the "agent of change principle" has been fully investigated and evidence of no harm presented.

The Local Plan can assist this situation considerably, by presenting policies and proposals that will ensure the amount of housing north of Madgwick Lane is not increased in the future. We believe strongly this is intended. We are therefore encouraged by the Council's recent press release (12th December) that the Government is considering giving greater importance to local constraints on inappropriate development. Land around the motor circuit clearly falls within that category and we are looking to the Local Plan Review to present, not only specific policies supporting the circuit and its activities well into the future, but to also make a positive statement that will identify and allocate that land as suitable only for appropriate uses.

The Council has operated an informal 400m 'buffer zone' around the motor circuit for a number of years, and while it was not challenged directly at the Madgwick Lane Public Inquiry, we have no doubt it will be threatened through subsequent development proposals, if not through the details for the appeal scheme, which have yet to be presented.

The Local Plan Review must take forward the buffer principle, but to extend beyond the arbitrary 400m limit used to date. All land immediately around the motor circuit and currently undeveloped must be designated in the local plan as a formal 'buffer zone,' the purpose of which is to safeguard the reasonable living conditions of residents and the community, and to ensure the business of the circuit is not subject to unreasonable restrictions as a result of development permitted after it was established.

It is vital all undeveloped land around the Circuit is not be left as undesignated, agricultural land, or open countryside, but must be given a clear role of safeguarding Goodwood operations for the benefit of all. This does not mean it cannot be developed for uses that are not affected by noise and disturbance from motor circuit and aircraft activities, or vice versa, but it should not be used for noise sensitive activities or represent a hazard to aircraft safety.

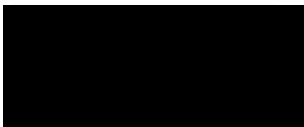
In the previous draft of the local plan review a policy was prepared for the motor circuit and aerodrome, which sought to provide some development parameters in addition to the planning permission, that allowed the Estate some flexibility to make limited changes to its operations or to provide new structures to support those lawful activities. We are looking to the plan to provide improved flexibility and offer greater confidence for investment decisions, alongside parameters within which a new permission can be progressed.

There is no similar permission controlling the aerodrome and aircraft operations, and therefore this is less of a problem, although there is likely to be need for some new buildings or structures related to those activities in the near future.

In conclusion, we are looking for the local plan to offer support generally to the Estate's operations, its business activities and the reinvestment of business benefits in the enhancement of the landscape and environment. To do this we are looking to plan policies which acknowledge and encourage reasonable change to sustain and enhance the Estate's important economic role, which should, for example, be given greater importance than the short-term gain of a limited amount of poor housing provision.

We accept the plan and its policies cannot be unduly specific, but it can recognise the Estate, its role, and stewardship, and in general acknowledge and support the activities which take place thereon; how these must respond to commercial pressures while respecting the interests of those who live and work around the Estate, and the environment which is at its heart.

Yours sincerely



Haydn Morris

HMPC Ltd

10th January 2023