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L190207 SAV Local Plan Reps



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

Tim Price
E: tprice@savills.com
DL: +44 (0) 207 409 5919
F: +44 (0) 207 495 3773

33 Margaret Street
London W1G 0JD
T: +44 (0) 20 7499 8644
savills.com

Sent via email to: planningpolicy@chichester.gov.uk

Dear Sir / Madam,

**REGULATION 18 CONSULTATION ON 'PREFERRED OPTIONS' DRAFT OF CHICHESTER LOCAL PLAN REVIEW 2016 – 2035
SUBMITTED ON BEHALF OF CHARITIES PROPERTY FUND**

Introduction

This consultation statement on behalf of the Charities Property Fund in response to the Chichester Local Plan Review 'Preferred Approach' ('**Local Plan Review**') consultation.

The CPF is the freehold owner of the properties at 12 – 18 West Street and 51 - 55 Tower Street ('**the Site**') in Chichester City Centre.

As outlined in the 'Schedule of Proposed Changes to the Policies Map', the Site is proposed to be located within the Chichester City Centre Primary Shopping Area ('**PSA**'), and will be retained within the defined 'Secondary Shopping Frontages'.

In addition, Policy DM11: Town Centre Development of the Local Plan Review states that proposals for main town centre uses, including those for the reuse of vacant retail floorspace above ground floor, will be permitted.

House of Fraser's trading downturn has been well documented over the past 18 months, which led to the retailer announcing the closure of a number of its department stores in 2019. The planned closure includes the store in Chichester.

CPF has been exploring opportunities for new tenants over the last 12 months as part of its proactive approach to asset management. More recently, CPF has started to consider alternative land uses to ensure the building will not become a long term vacancy. The

In summary, CPF supports:

1. The identification of the site within the 'Secondary Shopping Frontage' which supports a wide range of commercial land uses at ground floor level (Policy DM11(2)); and
2. The objectives of Policy DM11(4) which supports the re-use of vacant floorspace at upper levels within Chichester and other defined centres for a range of land uses.

The Site & Surroundings

The Site consists of a number of separate buildings which include a department store and a series of individual residential buildings.

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The Site is located within the Chichester Conservation Area and includes national listed buildings (Grade II).

The Site is bound to the west by small parade of residential dwellings. The north of the site is bound by the Novium Museum attached to 50 Tower Street, Woolstaplers car park, the County library, the County Council offices and some residential dwellings on Lancastrian Grange. To the south the site is bound by West Street and Chichester Cathedral Church of the Holy Trinity.

Representations

“Primary Shopping Area” is defined in the National Planning Policy Framework (‘NPPF’) as the “*defined area where retail development is concentrated*”.

The Site falls within the defined ‘Secondary Shopping Frontages’ within Chichester City Centre. This accords with the definition within the adopted Local Plan.

Policy DM11(2) supports a variety of commercial land uses¹ within the Secondary Shopping Frontages. The criteria set out in the Policy are well established and considered reasonable.

Policy DM11(4) of the Local Plan Review states:

“Within City Centres, Local Centres and Village Centres, proposals for the re-use of vacant floorspace on the upper levels for residential, leisure, commercial and community purposes will be permitted provided that:

- a) It is demonstrated that non retail use of the upper floor will not inhibit business workplace, storage or retail expansion;*
- b) The development has no significant adverse effects for the occupiers of neighbouring properties; and*
- c) The proposal reflects the need to minimise noise intrusion. Applications must be accompanied by details of noise insulation measures if required.”*

The explanatory paragraphs to Policy DM11 highlights the fact that non-retail ‘main town centre’ uses in the City Centre provide ‘essential services’ which are important to support vitality and viability.

It also recognises that vacant retail floorspace is inhibitive of successful town centres, and promotes proposals to redevelop unused floorspace for alternative main town centre uses such as offices, residential, leisure or community purposes.

This principle is aligned with Paragraph 118 of the NPPF which states that planning policies and decisions should promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs.

The re-use of vacant floorspace at upper levels for residential or alternative commercial land uses has the potential to meet other strategic policy targets relating to:

- Delivery of new homes;
- Creation of new employment floorspace, jobs and wages; and
- Supporting tourism.

The effective re-use of existing floorspace, particularly in accessible locations such as defined commercial centres, accords directly with the overarching objective of the NPPF to deliver sustainable forms of development.

¹ Classes A, B1(a), C1, D1 and D2.



Summary and Conclusion

As set out above, CPF is an important stakeholder within Chichester City Centre.

CPF supports the following parts of the emerging Local Plan:

1. The identification of the site within the 'Secondary Shopping Frontage' which supports a wide range of commercial land uses at ground floor level (Policy DM11(2)); and
2. The objectives of Policy DM11(4) which supports the re-use of vacant floorspace at upper levels within Chichester and other defined centres for a range of land uses.

Based on the evidence provided, the emerging policies of the Local Plan referenced above are considered to be sound and meet the relevant regulations.

We trust that the above submissions will be taken into account in the finalisation of the Local Plan Review.

Should you have any queries or require any further clarification, then please contact Tim Price at these offices. We reserve the right to make further comments or provide further evidence at later stages of consultation.

Yours faithfully,

A handwritten signature in cursive script that reads "Savills".

Savills (UK) Limited
Planning

cc. H de Ferry Foster – Savills IM