



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

26th September 2018

BMW023/SK

Dear Sir / Madam,

**Rolls-Royce Motor Cars Ltd (R-RMC) Goodwood: Chichester Local Plan 2034
HELAA Report August 2018: land east of Rolls Royce ID HWH0003**

David Lock Associates provide town planning services to BMW Group across its portfolio of manufacturing sites in England, which includes the home of Rolls–Royce Motor Cars located in Westhampnett, to the east of Chichester.

We are instructed to act on behalf Rolls-Royce Motor Cars Ltd (R-RMC) in connection with the Chichester Local Plan 2034 and to respond to the Council's request for comments on the Housing and Economic Land Availability Assessment (HELAA) August 2018 (received by e-mail on 10th September 2018). R-RMC are promoting the land to the east of the existing Rolls Royce manufacturing facility at Goodwood, Westhampnett, HELAA ID reference HWH0003, for employment uses.

We have reviewed the HELAA Report and Appendices, the Methodology and the Schedule of Comments received during the consultation on the methodology and note the findings from the detailed site assessments, as set out in Appendix 2: Sites rejected with reasons and Appendix 3: potential housing, employment and mixed-use sites. We are very disappointed to learn that the site assessment undertaken by Chichester District Council has rejected this potential employment site, which was put forward in response to the Call for Sites in August 2017.

In our view, the assessment that development in this location would “impact on long distance views to the South Downs National Park” and that the site “forms part of the buffer for the Rolls Royce factory” represents a partial assessment of the site's suitability for employment uses. We would urge the District Council to review its position. There is a clear requirement set out in paragraph 80 of the NPPF (July 2018) for planning policies and decisions to “help create the conditions in which businesses can invest, expand and adapt.” In this context, paragraph 80 of the NPPF further states that:

“Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider development opportunities”.

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We are concerned that the assessment of Site HWH0003 (land to the east of R-RMC) appears to have emphasised the relationship of the site to the boundary of the South Downs National Park without considering the wider economic requirements of the local, regional and national economy over the whole of the Plan period. In our view, any landscape impacts arising from the future development of the land to the east of the R-RMC facility would be capable of mitigation, as has been demonstrated in the approach to development related to the existing manufacturing plant at Goodwood.

It is worth bearing in mind that the Goodwood Aerodrome and Motor Circuit lies to the north west of the R-RMC facility between and immediately adjoins the southern boundary of the National Park, which is formed by New Road. This is a major venue for leisure and motor racing events which has been successfully integrated into the landscape very close to the National Park boundary.

The general approach adopted in the HELAA detailed site assessments has focussed on the suitability of land for a wide range of potential future uses, including housing and mixed use, as well as potential employment uses. We recognise that this approach might not be wholly appropriate for the land to the east of the R-RMC facility, which is being promoted as longer-term, strategic expansion land to facilitate potential future growth in production of motor cars for a global market, and to provide flexibility for the business to invest in its facility at Goodwood.

However, we would be extremely concerned if the Local Plan failed to make adequate provision to facilitate the growth of the District's largest manufacturing employer, based upon an unduly narrow assessment of site suitability within the terms of reference of the HELAA process. The Local Plan should take a wider view.


For clarity, we attach a Plan showing the land to the east of Rolls Royce (HWH0003) as confirmation that this site remains available for development for employment uses to meet the potential growth requirements of R-RMC during the Plan period. There are no other realistic alternatives. In promoting an allocation of this site for B1, B2 and B8 employment uses we would highlight that:

- The site lies more than a mile from the southern boundary of the South Downs National Park and is separated from it by fields and by the small hamlet of Westerton;
- It enjoys good access to strategic roads, being within the A27 corridor;
- It is capable of being effectively screened from the boundary of the National Park through buffer planting on its northern boundary;
- A restriction such that the land would be released only if required by R-RMC could be considered in the drafting of policy in the new Local Plan.



We would be pleased to provide any additional information in support of these comments to assist the Council with the Local Plan Review. It would also be extremely helpful to meet and discuss the relationship between the HEELA and employment land allocations in the emerging Local Plan. The interplay between these exercises needs to be robustly explored. We look forward to hearing from you.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Sheila Keene', is positioned above the typed name. The signature is fluid and cursive.

Sheila Keene
Planning Associate

email: skeene@davidlock.com