



Representation Form

Local Plan Review: Preferred Approach Consultation

The consultation on the Local Plan Review: Preferred Approach will run from 13 December 2018 to 7 February 2019. The document and more information on the consultation can be viewed on our website www.chichester.gov.uk/localplanreview

All comments must be received by 11.59 pm on Thursday 7 February 2019.

There are a number of ways to make your comments:

- Comment on the document on the internet using our online consultation website www.chichester.gov.uk/localplanreview (**Recommended**)
- Complete this form on your computer and email it to us at planningpolicy@chichester.gov.uk
- Print this form and post it to us at: Planning Policy Team, Chichester District Council, East Pallant House, 1 East Pallant, Chichester, West Sussex, PO19 1TY

How to use this form

Please complete Part A in full. Please note anonymous comments cannot be accepted, a full address including postcode must be provided.

Please complete Part B overleaf, using a new form for each separate policy or paragraph that you wish to comment on. Please identify which paragraph your comment relates to by completing the appropriate box.

For more information, or if you need assistance completing this form, please contact the Planning Policy Team by email at planningpolicy@chichester.gov.uk or telephone 01243 785166.

PART A	Your Details	Agent's Details (if applicable ¹)
Full Name	Rolls-Royce Motor Cars Ltd	Sheila Keene
Address	Rolls-Royce Motor Cars Ltd Stane Street Westhampnett West Sussex	David Lock Associates 50 North Thirteenth Street Central Milton Keynes
Postcode	PO18 0SH	MK9 3BP
Telephone		01908 666276
Email		skeene@davidlock.com
Organisation (if applicable)		David Lock Associates
Position (if applicable)		

Is this the official view of the organisation named above? Yes No

¹ Where provided, we will use Agent's details as the primary contact.

PART B

Please use a new form for each representation that you wish to make. Please note anonymous comments cannot be accepted. Any personal information provided will be processed by Chichester District Council in line with the General Data Protection Regulations 2018. More information is available at:

<http://www.chichester.gov.uk/dataprotectionandfreedomofinformation>.

To which part of the document does your representation relate?

Page/ Paragraph Number:	35	Policy Reference:	S3: Development Strategy
----------------------------	----	-------------------	--------------------------

Do you support, object, or wish to comment on this policy or paragraph?
(Please tick one answer)

Support

Object

Have Comments

Enter your full representation here giving details of your reasons for support/objection:

1.1 The Local Plan's Development Strategy is strongly focussed on distributing residential development in line with the settlement hierarchy. Development is steered to locations within or adjacent to Chichester and to four settlement hubs at Southbourne, Tangmere, Selsey and East Wittering.

1.2 For the Rest of the Plan Area, paragraph 4.20 explains that:

"The local plan aims to protect the countryside, but also recognises the social and economic needs of rural communities. As such, new development in the countryside will be generally limited to the appropriate diversification of traditional rural industries, small scale housing that addresses local needs, replacement dwellings/buildings, schemes that provide renewable energy and proposals that contribute towards creating a more sustainable rural economy."

1.3 This policy takes no account of the potential need for strategic scale employment in the B2 Business Use Class to be accommodated outside of the proposed strategic site allocations. These do not include the land which is being promoted on behalf of Rolls-Royce Motor Cars (R-RMC). We therefore object to the Development Strategy set out in Policy S3, as this does not make adequate provision for future employment growth for the advanced manufacturing sector. The proposed approach to meeting Business and Employment Needs in the Plan Area is discussed in more detail in our objection to Policy S8: Meeting Employment Land Needs.

1.4 We note that a total of 26 sites were promoted for employment uses in response to a "Call for Sites" (Reference: HELAA August 2018: paragraph 2.17). Land to the east of the Rolls-Royce Motor Cars (R-RMC) site at Goodwood, (HELAA ID HWH0003), was one of 19 sites which was assessed as being unsuitable for the reasons stated in Appendix 2 to the HELAA. These are:

- *"Impact on long distance views to the South Downs National Park"*
- *"Site forms part of the buffer for the Rolls Royce factory".*

- 1.5 This assessment takes no account of the range of potential mitigation measures which R-RMC would expect to incorporate in any proposal to extend an established major manufacturing facility in this location. Development at this location since 2003 has followed a design concept incorporating stringent design criteria and extensive landscaping, including buffer planting. Similar site-wide design principles and mitigation measures would be applied to any future development, including:
- Landscaping to the perimeter of the site to reduce the visual impact of a large industrial building;
 - High quality design specification to all external facades; and
 - Other influential design features could include a green roof (as on the existing building).
- 1.6 The mitigation of potential impacts, guided by a criteria-based policy, would address any concerns in respect of the potential landscape impact of any large new industrial building on sensitive views towards the boundary of the South Downs National Park.
- 1.7 Appendix 3B to the HELAA August 2018 lists the seven sites considered to be suitable for development for a range of employment uses. None of these sites are located within the parish of Westhampnett and only 3 "suitable" sites exceed 4 hectares in size. These are located within East Wittering and Bracklesham (HEWB0001 – 8.00ha and HEWB0002 42.58 ha), and at Southbourne (HSB0037a - 85.12 ha). Equally importantly, all are assessed as suitable for housing as well as employment uses, with an implication that were development to come forward on these sites they would be expected to accommodate a residential-led mixed use scheme. None are suitable for a large scale B2/B8 development, such as might be needed to accommodate potential new production capacity at R-RMC.
- 1.8 R-RMC's operations are currently split between two locations; Goodwood and Bognor Regis. To introduce a third location would be highly inefficient and would lead to additional lorry movements. The creation of super luxury, bespoke motor cars requires highly efficient production techniques, a dedicated well trained workforce and the latest facilities. To ensure the required level of quality, these operations need to ideally be housed in a single location. Multiple locations result in parts being handled many times, increasing the risk of damage and delays to the delivery of customer's vehicles. It is simply impractical to provide for possible future expansion at any location other than on land adjoining the existing site.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

- 2.1 The R-RMC Goodwood manufacturing facility has fully utilised the capacity of the existing site. Development has adhered to the design concepts that have been established in respect of height, massing and landscape impact mitigation. A new policy is therefore required to allocate the adjoining land to the east to provide for the possible future expansion needs of R-RMC at its Goodwood Site.
- 2.2 Our representations on Policies S8, Policy AL6 and Policy DM9 include proposed changes to the Local Plan.

(Continue on separate sheet if necessary)

Declaration

I understand that any comments submitted will be considered by Chichester District Council in line with this consultation and will be made publicly available on their website www.chichester.gov.uk and may be identifiable by my name or organisation, if provided.

Name (<i>print</i>):	Sheila Keene
Date:	07 February 2019