



## 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](http://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](http://www.chichester.gov.uk/localplanreview) (**Recommended**)
- Complete this form on your computer and email it to us at [planningpolicy@chichester.gov.uk](mailto: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](mailto:planningpolicy@chichester.gov.uk) or telephone 01243 785166.

<b>PART A</b>	Your Details	Agent's Details (if applicable <sup>1</sup> )
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Is this the official view of the organisation named above? Yes  No

<sup>1</sup> 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:	46	Policy Reference:	S8: Meeting Employment Land Needs
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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:

### **Spatial Strategy - Meeting Employment Land Needs**

#### **1 Existing R-RMC Operations at Goodwood**

- 1.1 The existing Rolls-Royce Motor Cars (R-RMC) manufacturing plant is situated on a site of approximately 20 hectares leased from the Goodwood Estate Company Ltd. The scale of production on the current site means that the existing plant is operating at full capacity with no flexibility for future expansion.
- 1.2 In 2014 R-RMC secured planning consent for the construction of two vital logistics and distribution units on the edge of Bognor Regis, in neighbouring Arun District, following an extensive search within Chichester District which revealed that no suitable sites for B2/B8 industrial uses were available within Chichester District at that time. The company's Travel Plan has evolved to include a company-operated bus service between the Goodwood site and its logistics site in Bognor Regis.
- 1.3 R-RMC has responded pro-actively to address the growing demand for employee parking at its site by building a new 500 space car park on the western part of its current site. This also provided a new car park for the adjacent school. This facility opened in December 2018 and has substantially relieved pressure for parking on the adjacent residential roads; the operation of the new car parking arrangements, including a parking management system, will continue to be monitored to ensure that the investment benefits both company employees and the local community.
- 1.4 R-RMC's existing site is constrained to the west by existing residential uses and a primary school (The March Church of England School) within the village of Westhampnett. Further west again land immediately to the East of Chichester is covered by Policy AL3, a Proposed Strategic Site Allocation for a minimum of 600 dwellings. The area immediately to the north comprises land within the Goodwood Estate that is required as car-parking for major events at the Goodwood Motor Circuit and Goodwood House, including the annual "Festival of Speed" and "Revival" race meetings. Residential development has recently been completed to the south of Stane Street, at Roman Walk.

- 1.5 The only direction in which R-RMC could therefore expand is to the east of the existing site, where provision should be made for possible future development. We therefore object to the omission of the proposed R-RMC strategic expansion land at Goodwood.

## **2 Anticipating Potential Future Growth at R-RMC Goodwood**

- 2.1 The BMW Group has a global requirement to future proof its major manufacturing locations through the provision of long term strategic expansion land. This ensures that any requirement for additional production capacity can be met where and when this is needed. For example, the BMW manufacturing facilities at the Eastern By-pass, Oxford (where the MINI is produced) and at Hams Hall, Warwickshire (engines), both include such provision. Importantly, the land is allocated for employment uses in both cases. The Goodwood facility is currently an exception in not fulfilling this requirement.
- 2.3 The company has previously considered options for suitable strategic expansion within Chichester District and has been unable to satisfy its requirements. The highly constrained supply of land suitable for industrial and storage uses within Chichester was a factor in this. In 2014, R-RMC approached Chichester District Council when seeking a site to accommodate approximately 29,000 square metres of B8 floorspace, which was urgently required to support the growing demand for new motor cars. It was concluded that it was not possible to satisfy this requirement within Chichester District and R-RMC subsequently invested in a new 29,000 square metre Technology & Logistics Centre at Bognor Regis in Arun District. The Bognor Regis units have been operational since 2015 and now provide 38,200 square metres of essential industrial and warehousing space which support manufacturing and logistics operations at the Goodwood site.
- 2.4 The decision to locate the new facility in Bognor Regis has necessitated an increase in vehicle movements between the Goodwood and Bognor Regis sites. Whilst the impact of the additional traffic movements on the road network and the local environment more generally has been mitigated in part by the provision of a shuttle bus service between the two sites, the limitations of this arrangement underline the importance of ensuring that adopted Local Plan 2035 makes appropriate provision for R-RMC to accommodate possible future needs at its Goodwood site.
- 2.5 We commented on the HEELA Report (August 2018) in September 2018, having promoted the land to the east of the existing R-RMC operation as a site suitable for possible future expansion of manufacturing capacity at Goodwood, Westhampnett (HELAA ID reference HWH0003). The site area is approximately 10.3 hectares. Our letter to the District Council's Planning Policy Team, dated 26<sup>th</sup> September 2018, is attached to our submission on the Preferred Approach Local Plan.

## **3. Strategic Site Allocations**

- 3.1 The Preferred Approach Plan proposes to meet employment land needs through a combination of different sources, as set out in Policy S8: Meeting Employment Land Needs. Four new employment sites are proposed for through allocations of land at:
- *Land south-west of Chichester (Policy AL6)*
  - *Land west of Chichester (Policy AL1)*
  - *Land at Chichester Business Park, Tangmere (Policy AL15)*
  - *Land at Shopwyke (Policy AL2)*

- 3.3 Policy AL1 provides for 6 hectares of employment land suitable for B1 business uses. Policy AL15 provides for a residential led extension to Tangmere village to accommodate a minimum of 1,300 dwellings; there is no provision for strategic scale employment within this allocation. Policy AL2, the Shopwyke allocation, provides for "at least" 4 hectares of employment land suitable for B1 and/or B2 Business uses. This is a residential led extension to Chichester City which would not have capacity to accommodate strategic scale expansion of B2 uses for new R-RMC production capacity. We have not commented on the detail of the proposed allocations AL1, AL15 and AL2 as none offer the potential for a strategic expansion site for R-RMC.
- 3.5 The final part of Policy S8 could be argued to be relevant to R-RMC Goodwood, although we do not consider that this would provide a sufficiently robust policy framework for bringing forward a strategic scale of B2 development on land to the east of the Goodwood facility. The relevant sub-paragraphs are reproduced below:
- "There is a general presumption that existing employment sites will be retained, with proposals to replace and intensify existing uses supported. Exceptionally, other leisure or community uses may be supported on employment sites (see Policy DM9)."*  
*Provision is made elsewhere in the Plan for other uses which are likely to create jobs, including those in retail. In addition, it is recognised that some sui-generis uses have very similar characteristics to B Class Uses. Policy DM9 provides for such uses to come forward on existing employment sites, subject to the criteria set out."*
- 3.6 We have commented separately on the following policies with reference to future proofing the Local Plan 2035 to facilitate R-RMC's potential expansion at Goodwood:
- Policy AL6 - Land South West of Chichester; and
  - Policy DM9 – Existing Employment Sites.
- 3.7 The Local Plan should be sympathetic to economic growth and referenced to the needs of R-RMC, recognising the contribution which R-RMC makes and will continue to make to the economy of Chichester District and the surrounding area.

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

**Suggested Changes to Local Plan Policy S8**

- 4.1 The approach to meeting employment needs either within the proposed Employment Land sources in Policy S8 or under the limited provision made within Policy DM9 does not allow for possible future expansion of R-RMC adjacent to its existing site. The Local Plan should include an employment land allocation providing for the possible future expansion needs of R-RMC, guided by a criteria-based policy.
- 4.2 Our representations on Policies S3, AL6 and DM9 also propose 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](http://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