



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)
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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:	Page 164 paras 7.88 to 7.99	Policy Reference:	Policy DM15
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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:

Kingsbridge Estates has submitted representations in connection with draft **Policy S11** but of course there is a close synergy with draft **Policy DM15** for which reason further representations are being made in connection with the latter as a separate submission.

The predecessor of Draft **Policy DM15** has been enormously successful in previous iterations of the Chichester Local Plan inspiring and enabling the Horticultural Sector to grow and expand over the last few decades resulting in the biggest employer in the District with a national and international reputation. The current draft Local Plan Review is being prepared now for the next twenty years when it is anticipated there will be considerable change and further evolution within the food production and preparation sector. Some of these changes can be recognised today whilst others might not be so obvious hence the Local Plan must be more visionary to ensure the food cluster in Chichester remains the leading sector in the country maintaining its leading market edge.

In summary, draft **Policy DM15** currently limits business opportunities within the HDA in relation to the concept of the '**Food Cluster**' and perhaps the time has arrived not to consider just the Horticulture Development in the future but to establish a 'Food Cluster.' The HDA requires to be enlarged particularly at Runcton in any event (see other representations made by Kingsbridge) to accommodate large warehouse and packhouse structures but the smaller sites within the HDA could be developed for **related food cluster industries**. The land at CDC's HELAA Ref: HNM0021 is ideally positioned within the current HDA / Food Cluster to accommodate food sector related businesses to help diversification and expansion as referred to in the GL Hearn HEDNA Report.

What follows is a review of the draft Local Plan Review together with the Council's various Background evidence-based reports. Towards the end of the representations some positive comments are made to improve the plan addressing the environmental, social and economic benefits as the three overarching principles of sustainable development (NPPF 2018, paragraph 8)

Local Plan Review and Evidence base

Please see representations made in respect of draft Policy S11 on behalf of Kingsbridge.

According to the Council's evidence base, the Chichester Housing and Economic Development Needs Assessment (HEDNA) [January 2018] recognises the huge contribution that the horticultural / food industry makes to the local, regional and national economy. Figure 22 (page 44) and paragraphs 4.25 and 4.26 further illustrate the projected annual growth rates for the period 2016-2035 stating that accommodation and food services sector is likely to generate 2,200 additional jobs. (para 4.26). Paragraph 11.52 (page 189) points out that the industry in Arun and Chichester is the strongest in the country of which "**75% is located in Chichester.**" "**The industry generates around £1bn in turnover**" supporting circa 7,500 jobs in the District. Members of the Council are fully aware of the international importance of the industry for which reason alone, the industry needs to be nurtured and supported in planning policy terms to ensure the continued success of food production and preparation for the next 20 years.

Pages 188 – 204 [HEDNA] specifically relate to the Horticultural Development Areas. At paragraph 11.46 it is repeated that the industry should "**remain nationally and internationally competitive**" and that "**these areas would host glasshouses and related facilities, including packhouses**" (our underlining)

Paragraph 7.88 of the Local Plan Review repeats that the basis of Policy DM15 is "*To ensure that the plan area's horticultural industry remains nationally and internationally competitive, it is important that sufficient suitable sites are available. To support this activity, the Council has designated Horticultural Development Areas (HDAs) in the countryside, where glasshouses and related facilities, including packhouses, may be allowed and the impact of their large size and bulk is minimised.*" The all-important words "**and related facilities**" are noted in the lower text, reflecting the Council's evidence base text which do not find their way into the policy text; our representation proposes the wording in the draft **Policy DM15** is altered to allow other **related businesses** to be co-located in order to evolve, adapt and continue to create a **Food Cluster** thus remaining at the leading edge of food production.

It is recommended that paragraph 7.93 of the Review be considered further because the evidence base provided in the Hearn HEDNA Report has recorded already that there is a shortage of land available and the Runcton HDA **is almost at capacity** (confirmed at paragraph 4.78 of the Review). The text states the preferred approach is to develop the HDA's first and if, during the plan period, additional land is required, then land adjacent should be considered. The point is, it is known today already (in fact in January 2018 – a year ago) that there is insufficient land available during the plan period to 2035 for which reason it follows that sufficient additional needs to be identified now. The uncertainty surrounding the current wording of policy **DM15** (alongside **S11**) does not lend itself to quick decision making and new investment in a fast-moving industry. Paragraphs 7.95 to 7.97 inclusive provide a variety of unwanted hurdles which could be resolved at this stage in the plan making process resulting in a far better and considered policy which will encourage and facilitate new investment.

For example, paragraph 7.95 require applicants to demonstrate the reasons why development cannot take place within the HDA but with such a shortfall of land now it is more likely that future glasshouse, packhouse and related business applications will have to be outside HDA's; this adds uncertainty to business. Paragraph 7.96 is almost superfluous today because there is no more land of a suitable size and

configuration available for horticultural development. The hurdle imposed by paragraph 7.97 can be determined now at the LP Review stage as the Strategic Landscape Assessment identifies land to the south of the Runcton HDA as being an area of Medium to Low sensitivity. For all these reasons, the hurdles could be removed and a higher degree of certainty be afforded in the Local Plan.

At the same time, to further remove unwanted obstacles to the development of the food and drink sector of the economy 'related businesses' should be included within **Policy DM15** giving further confidence to the sector.

The HEDNA evidence base also recognises at paragraph 11.47 that "***The industry spans a range of sectors including agriculture, food manufacturing, professional scientific and technical and logistics and distribution. As such there is some overlap with the analysis above which has estimated the need for B-class accommodation for these sectors.***"

This is very important to the future role of the industry and the way in which the HDA's respond in policy terms. It has been pointed out in recent correspondence (August 2018) that parts of the Runcton HDA are no longer fit for purpose and the Council has responded already by removing 5.9ha and 3.34ha respectively as per the attached plan submitted to the Council last August. (See CDC Plan DM15 Schedule of Proposed Changes to the policies map (December 2018) Page 23). Church Field (2.3ha) having been refused planning permission for polytunnels, also now needs to be removed from the HDA. Depending on the Council's opinion regarding Walnut Tree Farm (3.1ha) this land could be included for specialist housing.

In line with the evidence base HEDNA Report, it is recommended that the Runcton HDA be expanded as per the plan submitted already (and attached again) to include a further 21.2ha and 9.7ha which, if included within **Policy S11**, should provide adequate land for future expansion of the industry for the next 18 years. (see reps made under S11) The smaller pieces of land remaining within the existing HDA's are too small or the wrong configuration to accommodate large scale greenhouses or packhouses but such parcels of land could be utilised for "related facilities" which could assist with developing the Chichester Food Cluster into the future. Specifically Land Ref: HNM0021 within the HDA could conveniently accommodate such Land Uses. It is also helpful to appreciate that the Town and Country Planning (Use Classes) Order does not always provide the necessary support for the **food cluster uses** because as the HEDNA report suggests, there is a degree of overlap and merging between different Use Classes. Planning Policy therefore needs to recognise the fluidity necessary to accommodate different uses that would contribute to a successful Food Cluster and encourage future investment.

Recognition in the Council's evidence base report that the industry should remain nationally and internationally competitive implies that planning policies need to be updated incorporating sufficient land for horticultural and related facilities. It follows therefore that further land should be included within the Runcton HDA given the current shortage.

The Runcton HDA is located in a prime position near the Sussex County Town of Chichester, the most sustainable settlement in the District where transport links are good (as referred to in HEDNA). It is for this reason the demand for space is most likely to be nearer Chichester than anywhere else.

Paragraph 11.62 (HEDNA) recognises also that higher paid employment opportunities now exist within the industry as greater mechanisation is enhanced to improve production which is wholly in line with one of the key aims of the Council's Local Plan. [Paragraphs 1.5, 2.14

and 2.20 of the CDC Local Plan Review]. The Review also aspires to “**Support and diversify economic activity**” and to “**Provide land and premises that enable local businesses to grow and flourish**” to which end the policies should reflect the vision, aims and objectives to enable businesses and the industry to prosper over the plan period to 2035. Paragraph 4.78 of the Review acknowledges “land may be required at Runcton HDA area which is almost at capacity.” (our underlining) Notwithstanding the following sentence in 4.78 iii which suggests that draft **Policy DM15** could be used to allow some expansion, this is not helpful at the outset of a 20 year vision and plan. We know already that land will be required hence Policy S11 needs to be drafted in a more positive manner to actively encourage future investment to maintain Chichester’s competitive advantage whilst **Policy DM15** only needs to provide the necessary guidance to ensure positive investment.

The Council’s evidence base “**Landscape Capacity Study**” [2018] **Sub-Area 133 Runcton Eastern Coastal Plain** identifies the proposed extension land to the south of the current HDA (see attached plan of proposed extension) as having a *Low* Landscape value with a *High* wider landscape sensitivity resulting in an overall Landscape Sensitivity rating of Medium to Low. Most importantly the Landscape Capacity for development on the land is considered Medium / High meaning that this area has greater capacity for development than surrounding land.

The **Sustainably Assessment** prepared by the Council (at paragraph 5.2.6 (page 38)) allows for additional horticultural development of just 68,000m² to support draft Policy S11 but clearly in the light of comments above the SA will need to be reviewed in this context.

It is noted that the Peter Brett **Transport Study of Strategic Options and Sustainable Transport Measures** states that “for Scenario 1, and with the proposed mitigation in place, the network conditions are generally projected to be comparable to those in the baseline suggesting that the proposed junction mitigation has the potential to mitigate and accommodate the growth provided for in this scenario;” [Paragraph 12.1.2, Page 134]

More recent Developments

In August 2018 correspondence was submitted to CDC (dated the 7th August 2018) attached to which was a plan of the existing and proposed HDA explaining that the current HDA Policy at Runcton enjoyed little prospect of further development unless and until the boundary of the HDA was extended to provide for future expansion during the next plan period 2016 – 2035 ie: for the next 18 years from now.

On the 19th December 2018 CDC’s Planning Committee unanimously approved an extension to Drayton II amounting to 7,500sqm but during the debate by Members it was generally recognised that the industry is a world leader in Chichester and needs further support enabling businesses to rapidly respond to market conditions.

It is important to appreciate that whilst the initial packhouse at Drayton II (measuring 11,470sqm permitted in 2015) together with its extension as well as the extension to Wight Salads of 3,975sqm [Ref: NM/16/02461/FUL dated 16th November 2016] and the packhouse granted in 2014 [Ref: 14/01721/FUL] measuring 107,890sqm have all been approved in the recent past. This demonstrates a very healthy, expanding industry investing heavily in the local economy. With the uncertainty surrounding Brexit it is even more important to ensure that land at the Runcton HDA is adequate to enable further developments to secure food for the nation.

Attached is a PowerPoint plan prepared by Naomi Langford and presented to CDC’s Planning Committee on the 19th December 2018 when the planning application was considered by Members for the Extension to Drayton II and approved unanimously. As this

document was helpfully prepared by Officers, is now in the public domain and is familiar to Members, the document provides a snapshot of the extensive developments at the Runcton HDA reflecting the plan submitted in August 2018. (Additional copies are attached here for ease of reference.) The Officer document clearly demonstrates also that there is little useable land remaining at Runcton HDA to accommodate further expansion.

Plan Attached:

- Proposed Extension to the Runcton HDA;
- Aerial plan presented to Planning Committee (December 2018)

(Continue on separate sheet if necessary)

What improvements or changes would you suggest?

In summary, based upon the above commentary and analysis the following recommendations are made;

Policy DM15 wording to be altered to;- (Changes are in a blue font and / or wording crossed out.)

“Policy DM15: ~~Horticultural Development~~ or Chichester Food Cluster

Large scale horticultural glasshouses and related B Class Uses will ~~continue to be~~ focused within the existing Horticultural Development Areas at Tangmere and Runcton. The Sidlesham and Almodington Horticultural Development Areas or Chichester Food Cluster will continue to be the focus for smaller scale horticultural glasshouses.

Within designated Horticultural Development Areas, as shown on the Policies Map, planning permission will be granted for new glasshouse, polytunnel and ancillary related development where it can be demonstrated that the following criteria (1-7) have been addressed:

1. There is no significant adverse increase in noise levels resulting from machinery usage, vehicle movement, or other activity on the site, which would be likely to unacceptably disturb occupants of nearby noise sensitive properties or be likely to cause unacceptable harm to the enjoyment of the countryside;
2. The proposal does not generate unacceptable levels of soil, water, odour or air pollution and there is no significant adverse impact resulting from artificial lighting on the occupants of nearby sensitive properties or on the appearance of the site in the landscape;
3. New planting is sufficient to benefit an improvement to the landscape and increases the potential for screening;
4. Adequate vehicular access arrangements exist or will be provided from the site to the road network to safely accommodate vehicle movements without detriment to highway safety or result in unacceptable harm to residential amenity;
5. The height and bulk of development and associated ancillary development, either individually or cumulatively, does not damage the character or

appearance of the surrounding countryside, and mitigation measures are included to address any detrimental effects e.g. in order to mitigate the height and bulk of new horticultural structures;

6. It can be demonstrated that adequate water resources are available or can be provided and appropriate water efficiency measures are included; and
7. Acceptable surface water drainage capacity exists or can be provided as part of the development including sustainable drainage systems or water retention areas.

Outside HDAs

Planning permission will be granted for glasshouse, polytunnel and ancillary related development including the extension to existing Horticultural Development Areas where the above (1-7) and following criteria (8-11) have been addressed:

8. There is a horticultural justification for the development and it can be demonstrated that the proposal cannot be accommodated within existing HDAs;
9. The land is sufficiently well drained, level and of a quality to be suitable for horticultural development;
10. Necessary infrastructure and services are available or will be provided; and
11. The proposal is ~~not located within open countryside~~ and ensures that long views across substantially open land are broadly retained or otherwise mitigated.”

If Policy S11 is altered to extend the Runcton HDA incorporating other changes suggested above, there should be little requirement for the Policy wording ‘Outside HDA’s.

Chichester Local Plan Review 2035 Preferred Approach – December 2018 Schedule of proposed changes to the policies map – needs to be amended to replace the 10ha lost and add a further 20ha for future expansion.

The Council’s SA along with other strategic evidence-based documents will require amendments and updating as a result of any policy changes.

The **Policies Map DM15** requires amending to accommodate the loss of circa 10ha plus the additional circa 20ha for future growth and diversification of the food cluster.

(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>):	Graham Beck
Date:	7 th February 2019

