

Chichester Local Plan Review Preferred Approach 2016-2035

Representations on behalf of the Goodwood Estates Limited

Introduction

The Goodwood Estates Ltd welcomes the opportunity to again participating in shaping the future of the District through this review of the local plan. The authority will be well aware of the Estate's firm view on the future scale, shape and form of Chichester to ensure that it retains the very special characteristics that underlie its economic success.

Development to meet the growing needs of the City and its environs must be accommodated if the District is to prosper and grow, but this should not mean a "free-hand" for developers on each and every undeveloped 'greenfield' around the City. Development of the next area of undeveloped land adjacent to the city's existing boundaries does not mean it is the most sustainable approach for the community as a whole. It is all too easy for landowners, at a time of acute housing demand, to promote sites as the next closest to available services (often 'as the crow flies') providing housing quickly to meet that undeniable need. The north and north-eastern edges of the city are vulnerable in this regard, an area for which the maintenance of openness is essential for the sustainable and sound interrelationship of Chichester with the neighbouring national park.

Up and down the country, the negative effects of suburban housing growth promoted on that basis are experienced; often without a true recognition of infrastructure needs and a consequential increase in car borne journeys and loss of greenspace. Equally the often, bland design and over-developed sub-urban layouts, tacked on to urban edges, may mathematically meet local needs and offer people an opportunity to own or rent a home, but consequentially erode the community and character of locations to the long-term detriment of its economic base, identity and community distinctiveness; this is particularly true of cities such as Chichester, where the overall character and ambience underpins much of its economic success.

The authority will be well aware of the "Cathedral Cities Initiative", which seeks to recognise the economic and heritage importance of protecting the form and context of the country's important cathedral cities and historic market towns. By providing clear, precise and 'joined up' planning policy protection, that directs new development and associated infrastructure appropriately to sites best able to accommodate it in terms of benefits to the community as a whole (offering benefits in excess of the provision of additional homes and not just the individual interests of the landowner 'dressed up' as offering wider local benefit) it will prevent inappropriate inner-urban and sub-urban development that will cumulatively destroy the true character and distinctiveness of the city.

Chichester is used as an exemplar in the Cathedral Cities initiative, promoted initially at the time of formulating the last local plan for the District, where there was a real threat unchecked urban expansion would undermine the very essence of the District's local economy. That threat has been reduced through this local plan by changes to strategic allocations, but the threat remains from unscrupulous developers and landowners who will continue to exploit the 'loop hole' provided by a lack of housing supply or incomplete planning policy position (potentially an acute situation until this plan is adopted). It is essential this plan not only makes provision to meet objectively assessed housing and employment needs but equally ensures that essential open areas, around and within the city, which contribute positively to its setting, character and economic vitality are given long-term protection through specific policy designation.

The NPPF is explicit that sustainability is a true balance of social, economic and environmental considerations. This means the plan must represent a true reflection of the suitability of a location to accommodate additional growth in a meaningful way. It must not apply the over simplified, developer led approach that the next piece of available land nearest the centre must be sustainable and developed for housing. A robust strategy will look at all sites within the district making use of all appropriate and available land within urban areas, surrounding settlements and along transport corridors, as well as the "easy pickings" on the urban edges. Development sites further from the city centre, can often prove more sustainable in terms of the NPPF sustainability balance than sites that comprise the next undeveloped site on the urban edge. Any development promoted must, as a minimum, ensure that it demonstrates a positive response to the sustainability balance, not just meeting a mathematical housing need, and provide appropriately, not only for the infrastructure needs of the housing to be provided, but also for the community as a whole; too many development proposals focus simply on the needs of the individual site giving rise to the many real concerns of local people that the community does not have the capacity to absorb additional housing.

The Estate is therefore heartened to see the council taking a bold step through this Local Plan Review to reconsider previous development scenarios, while ensuring that a true level of housing need is accommodated. Paragraphs 4.30 to 4.33 recognise it is not sustainable to continue to rely on past sources of supply. We support this stance fully and encourage the council to take the initiative forward even at this early stage. As stated in the draft plan, there is a long lead in time to such a fundamental and complex change of direction in strategic development, but without a meaningful start now old habits will continue, resulting in an increasing unsustainable City and loss of the very factors that undermine its economic success. There is an inevitability that developers and landowners affected by the changes, will, through planning applications and appeals, do their utmost to ensure their individual interests are protected, over and above the long-term impacts of inappropriate developments on the community as a whole. To counter such proposals in the short term, this plan must set out a logical, precise and robust strategy that follows all up to date Government advice in a positive and sustainable manner

The Estate believes a sound planning strategy set out in this local plan review can deliver ample development land within the district in a manner that will meet housing and employment needs while protecting the very important transitional relationship offered by land between the urban edge and the SDNP boundary. This will involve a step change from past trends of allocating the next area of land as development locations, to be focussed more on evolving settlement hubs on good transport routes, such as around Tangmere, and allowing appropriate scales of development to sustain rural settlements that have to date be excluded from growth considerations. This will involve an on-going dialogue with adjoining authorities under the duty to co-operate to ensure future development is located in sustainable locations where it is most appropriate and not simply in locations of least (often political or subjective) resistance. The Estate will support the council in its emerging strategy and looks forward to working alongside it in the pursuit of a sustainable social, economic and environmental future.

The district is both fortunate but equally unfortunate to have a large part of its area within the National Park, a similarity it shares with the Estate. The purpose and objectives of the Park are

acknowledged and supported, and the Estate continues to work with SDNP to establish a planning regime that recognises the true role of landed estates in establishing the character and form of the National Park. This includes the generation of planning policy and proposals through the emerging National Park Local Plan, that recognise the importance of allowing estates to continue to evolve such that the character of the National Park can be sustained. This includes an appropriate planning approach that allows justified estate development, which may at times appear 'at odds' with general national park objectives.

It is the Estate's belief the Park has not considered the true development capacity of its area and this will have unintended consequences on communities, not only within the Park itself, but also within surrounding districts. If the Park is to avoid development up to its boundary, in part a response to its own displaced needs, it is important the District retains existing open land to the north and north east of the city, permitting only new development and activity that are appropriate to a rural area, complement existing land uses and or which maintain the essential openness of the area.

Land between the city and National Park is an area that must be governed by landscape priorities that provide a crucial open, and where deliverable, accessible green space to the city community, but equally provides

- (a) clear linkages to the national park,
- (b) protects the integrity of the National Park boundary, and
- (c) protects the important relationship and setting of city and Park.

Definition of the City Boundary (Plan SB1) should not simply be a red line on a plan, but supported by clear policies and proposals to encourage the boundary to be enhanced and defended.

The Estate owns a significant "buffer" area between the National Park and City and will continue to work closely with both the Council and the SDNPA to achieve such an objective; to establish an appropriate planning policy regime for land between the city edge and National Park. A sound planning approach to the use of land south of Lavant Straight, between the A285 and A286, will ensure policy objectives within that area are complementary, and do not detract from the setting of either the historic city or national park. The land should be kept open primarily with the exception of appropriate development around the settlements of Westhampnett, Westerton, Strettington, and at Goodwood Aerodrome and Motor Circuit (as more specifically controlled through other policies of the plan). The land should be used for agriculture, countryside, forestry, public access and other landscape purposes.

Through representations to this local plan, set out in individual comments to policies and sections, the Estate seeks to demonstrate its commitment to the future sustainability of Chichester and its community through appropriate use of this "buffer area."

New policies proposed through the Local Plan, such as those proposed for the Goodwood Motor Circuit and Aerodrome, provide a positive response to the above objectives and are to be supported. Provision of a "Whole Estate Plan" for Goodwood as required by policies contained in the emerging National Park Local Plan, will provide a planning policy context that straddles the District/National Park boundary. The District Local Plan should acknowledge this approach and ensure that its policies do not conflict.

Spatial Vision and Strategic Objectives

The objectives set out in paragraph 3.2 and further through 3.19 of the draft Local Plan are to be supported, but the plan should explain through subsequent sections, how these objectives are being achieved through the proposed policies. At present this is inferred rather than demonstrated through supplementary policy. The Estate suggests a more transparent link between policies and the delivery of the vision will provide a more robust position in the defence of inappropriate development. This could be achieved through cross referencing policies to objectives.

The importance of policies protecting areas from inappropriate change should be given equal weight to policies promoting development. Leaving areas without a purpose (i.e. without a positive and demonstrable contribution to the vision) through no designation (unallocated), or a generality of policy (e.g. open countryside) leaves them vulnerable to inappropriate development proposals (in accordance with Policy S1).

Supporting paragraphs 3.3 – 3.16 are understandably general in nature, but additional focus of objectives, such as, for example:

- the identification of general areas to keep free of inappropriate development (e.g. between the city and National Park);
- describing the important features (including gaps, views, and built form) that make Chichester special;
- what is meant by a truly sustainable neighbourhood (not what a developer claims) and what is required to achieve it;
- what is meant by local distinctiveness, character and cohesion? Has evidence been provided to demonstrate what is meant by these terms and provide both developers and the community with a clear reference point?
- What is meant by 'careful management' in the protection of the relationship to the National Park? The relationship to the City should be included in paragraph 3.7.
- The stated emphasis of policy in the Manhood Peninsula will be misinterpreted to be totally resistant to new development, forcing need to be met in other areas and increasing the reliance on the car. The Estate believes there are sound opportunities within the Peninsular to provide new housing and employment sites in appropriate locations to support local economic opportunities and recommends that the Housing Provision figure (paragraph 4.24) should be increased.

Policy S2: Settlement Hierarchy

The proposed settlement hierarchy is supported. A concern of the Estate for many years has been the lack of opportunity within smaller rural settlements to provide new housing. Restrictive policies over many have had the consequence of any development opportunity arising in such a location, being utilised for speculative purposes and developments that are out of the reach of most local people in need. The recognition in paragraph 4.20 of the benefits of appropriate development is therefore supported. Although the Estate has little land beyond Westhampnett which could be so promoted, the plan should make provision for new housing developments in smaller rural settlements, where development can demonstrate meeting the specific social and economic needs of individual community (for example, new smaller dwellings to allow downsizing of existing residents, local needs housing – potentially promoted through neighbourhood plans, encouraged more strongly through paragraph 4.25 and or Community Land Trusts) as well as meeting the wider district need.

Policy S5: Parish Housing Requirements 2016 - 2035

The Estate believes the Parish figures are conservative in their estimation even though indicative. The Estate would prefer to see the figures as guidelines rather than targets (which inevitably they will become), with greater encouragement given to the preparation of Neighbourhood Plans where the true capacity (environmental and social) and need of settlements can be established. Neighbourhood Plans should be set clear objectives to provide sustainable communities that make a positive contribution to the needs of the District as a whole and should not be supported where the objective is clearly to protect the limited interests of a minority.

The Estate welcomes the commitment of the Council to work with Parish Councils to identify development opportunities where no Neighbourhood Plan is to be produced. The Estate has brought to the council's attention, through the annual call for sites, land which is suitable for development to meet the District housing and employment needs. Its use will contribute to the sustainability of local communities and the Estate. Most of the Estate's available sites lie within the National Park, but there is available land at Westhampnett, Westerton and Boxgrove. The sites at Dairy Lane (Goodwood Site 16) and Stane Street (Goodwood Site 18) in the call for sites, are available immediately to meet housing need and should be included within the defined settlement boundary (Local Plan SB5).

Estate land at Broxgrove, lying alongside the northern boundary of the village and between it and the A285 is suitable for development. It can provide a suitable addition to the general expansion of Tangmere, providing housing to meet different market sectors. The land identified in the call for sites as (Goodwood Site 23) is readily available and could provide for a relocation or extension to the village playing field as part of a comprehensive design.

Meeting Business and Employment Needs

The Plan's commitment to developing a strong and thriving economy is supported by the Estate, which together with Rolls-Royce lying within its grounds, is a major economic driver in the District. In recognition the Estate supports, subject to some modification, the introduction of a new policy for the Goodwood Motor Circuit and Aerodrome, which recognises its importance to the local economy. In addition, and following the success of Rolls-Royce, the Estate wishes to promote two of its potential development sites for employment use. This would make appropriate provision for any expansion of Rolls-Royce, or a complimentary business(es). The sites at Westhampnett (Goodwood Sites 14 and 15 as promoted through the annual call for housing sites) alongside the site recently transformed to provide a car park for Rolls-Royce (Site 17) are ideally placed for employment use as a priority through this plan. The Estate will welcome the opportunity to discuss this opportunity further with the council.

The safeguarding of employment sites from unjustified loss is welcomed but this should be more robustly justified in paragraphs 7.53 – 7.60 and Policy DM9. In particular, how the policies of the Local Plan will take precedence over National Policy and Guidance set out in the NPPF and revisions to the General Permitted Development Order, where the proposal conflicts with the aims and objectives of the Local Plan. Compliance criteria are provided for use when considering the loss of existing employment sites but it is difficult to see how these would preclude conversions or redevelopments where planning policy might have limited influence.

Addressing the Need for Retailing

At paragraph 4.66 the plan is correct to recognise the retail offer within the District. However, the plan continues the traditional approach to protecting and revitalising existing retail centres. It fails to acknowledge the significant changes in retailing in recent years and the changing nature and character of the traditional "High Street" and shopping areas. While the policies are not in

anyway, inappropriate, and there is acknowledgement of the rise in cafes and restaurants in some localities, the Estate believes the plan should go further to embrace retail changes that go beyond the traditional shopping parade. The Estate itself has a range of 'retail activities' within its portfolio of business interests and is considering others in a changing market place and in response to its patrons' expectations. The Estate is looking to the local plan to provide an appropriate retail environment that allows new enterprises to become established in areas not traditionally associated with retail activities.

Providing Supporting Infrastructure and Services

Paragraph 4.81 states the delivery of infrastructure to support new development is dependent upon maximising the contribution from the development process whilst recognising that a contribution from both the public and private sector will frequently be necessary. This is a well-recognised position and cannot be criticised, yet when any new development proposal comes forward there is an inevitability that the community will oppose on grounds of the lack of existing local services and infrastructure and the all too often lack of early provision making good the shortfall. The reasons are well rehearsed and unlikely to change without a robust policy position in the local plan. It is recognised in recent local developments some infrastructure has been provided, generally on-site, but Policy S12 should go further to provide a clear expectation on developers of large sites to plan and provide for their full infrastructure impacts, before or in parallel with implementation.

East-West Corridor

That part of the Goodwood Estate not falling within the National Park lies within the East-West corridor. While the planning justification for the corridor is understood, the Estate has held reservations about the scale, form and location of some development, particularly that falling within the north-east Chichester Strategic Allocation. It has been our long-held belief that the allocation was more for mathematical expediency and appeal defence than a sound planning strategy and we are encouraged by the change in direction to the strategic allocation and the long-term aspirations proposed through the draft plan.

Paragraph 4.88 should make it explicit that although it is a focus for growth to 2035, the corridor does not mean that any site within its parameters is suitable for development. The setting of the city, particularly its relationship with the National Park, is to be protected and Policy S13 must be given more strength in this respect to ensure this matter is at the forefront of planning decisions. This can be done by expanding the bullet points as follows (in red):

Policy S13: Chichester City Development Principles

New development, infrastructure and facilities will be planned for Chichester City that enhance the city's role as a sub-regional centre and visitor destination, contribute to meeting local needs, and conserve and enhance the city's historic character, heritage and wider environs, particularly along the edge of the national park boundary. This will include provision for development and proposals that:

- Support and strengthen the vitality and viability of the city centre and its role as a shopping/visitor destination, employment centre and a place to live;
- Support and enhance the city's existing heritage, arts and cultural facilities;

- Enhance the city's existing heritage, arts and cultural facilities;
- Enhance the city's existing entertainment and leisure offer, including the 'evening economy' **and major events**;
- Reinforce and strengthen the city's office market;
- Protect views of the cathedral and the setting of the city from the surrounding landscape and adjoining National Park, including the provision of new green infrastructure and green space;
- Provide or contribute towards improved facilities for education, health and other social and community uses;
- Enhance the character and distinctiveness of the city's local neighbourhoods, including conserving their settings and features;
- Provide or contribute towards an enhanced network of green infrastructure, including additional parks and amenity open space, outdoor sport pitches, recreational routes and access to natural green space particular where these can be linked at landscape scale and or providing connectively with the SDNP ;
- Support and promote improved access to the city and National Park using sustainable modes of travel in accordance with the transport strategy for the city (see Policy S14); and
- Enhance the public realm, especially within the city centre and key routes in and out of the city.

All development will be required to have special regard to the city's historic character, **setting** and heritage. Development proposals should be underpinned by robust historic characterisation and impact assessments and make a positive contribution to the city's unique, setting, character and distinctiveness.

If necessary, the Council may prepare a Supplementary Planning Document(s) or Development Plan Document(s) which will set out a coordinated planning framework covering Chichester City centre and other areas of change in the city **and its environs**, which will identify development sites, transport and environmental improvements and define areas within which specific uses **or means of protection** are considered appropriate or and will be supported.

Westhampnett/North East Chichester

In considering development within the East -West corridor and its potential impacts on the Estate, the strategic allocation at Westhampnett/northeast Chichester is a key consideration. The removal of land from the allocation to limit development to that already granted planning permission is welcomed and supported. To protect the land removed from further development pressure a positive use of the land should be defined through this plan. It has a distinct open space use, to protect views of the cathedral and setting of the city and also to provide a suitable landscape transition between the city and National Park. Much of the land removed from the allocation comprises floodplain and falls within the 400m noise buffer to Goodwood Circuit and Aerodrome. The role of the land removed should be confirmed as performing the role of open space and green infrastructure, including a linear greenspace with public access along the Lavant Valley. It is helpful if Policy AL4 cross references more specifically to the provisions of Policies S15 and S16 in terms of the open space protecting the Goodwood Circuit and Airfield.

Policy AL4: Land at Westhampnett/North East Chichester

Land to the west of Westhampnett and north-east of Chichester city is allocated for mixed development, comprising:

1. 500 homes;
2. Community facilities;
3. Open space and green infrastructure, including an area of linear greenspace (as defined on the proposals map) which will include suitable woodland planting and landscape treatment to provide public access along the Lavant Valley and to the National Park, and provide a green setting for the city alongside the national park border.

Taking into account the site-specific requirements, proposals for the site should:

4. Development will be directed towards the settlement of Westhampnett, to the south of Madgwick Lane, and to the eastern edge of Chichester, but away from the floodplain of the River Lavant, and the Goodwood Motor Circuit and Aerodrome (Policy S16);
5. Development should be well integrated with the village of Westhampnett and neighbouring residential areas in Chichester City and should be planned to provide good access to existing facilities and not to harm the setting of the historic city, or the character, setting and continued operation of the Goodwood Airfield and Motor Circuit ;
6. Development should provide or contribute to improved local community facilities;
7. Provision should be made for green links to the South Downs National Park and Chichester City. Opportunities should be explored for provision of integrated green infrastructure in conjunction with the other strategic sites to the east of the city, including Tangmere;
8. Development should be designed with special regard to the landscape sensitivity of the site (especially to views towards and from within the South Downs National Park), and to reduce the impact of noise associated with the Goodwood Motor Circuit/Aerodrome. Major new structural planting will be required to soften the impact of development on views from the north and around the Motor Circuit;
9. Development should be designed with special regard to the Graylingwell Hospital Conservation Area, the buildings of the former 'pauper lunatic asylum' and the Grade II registered park and garden in which they sit, and to other listed buildings in the vicinity of the site and their settings. Important views of Chichester Cathedral spire from the area should be protected;
10. Adoption of a comprehensive approach to flood risk management on the site, including consideration of surface water drainage as part of a masterplan process; this shall not be limited to 'hard engineering solutions', but promote 'soft, green' solutions that contribute positively to the area's Natural Capital
11. Road access to the site will be determined as part of the masterplan process, depending on the location(s) for proposed development. Development will be required to provide or fund mitigation for potential off-site traffic impacts through a package of measures in conformity with the Chichester City Transport Strategy (see Policy S14);

12. Provision should be made for regular bus services linking the site with Chichester city centre, and new and improved cycle and pedestrian routes linking the site with Chichester City, the South Downs National Park and other strategic developments to the east of Chichester City including Tangmere. This could include exploring the potential for a bus only route linking the development with the Graylingwell area; and
13. Development in the Airfield Flight Safety Zone, which should be referenced in any planning application, should be strictly controlled and limited to that which can be justified as causing no hazard to the operational needs of the Airfield.

Development will be dependent on the provision of infrastructure for adequate wastewater conveyance and treatment to meet strict environmental standards.

Goodwood Motor Circuit and Airfield

The plan's acknowledgement of the importance of Goodwood Motor Circuit and airfield is welcomed and supported. The policy is broadly acceptable to the Estate but we believe can be strengthened to provide greater robustness as well as flexibility.

Paragraph 4.107 supports ongoing operations at the airfield and motor circuit within the terms of existing legal agreements. For the foreseeable future that situation is likely to continue. However, to remain effective, both activities must evolve and respond to changes in the market to ensure both can be sustained. Of course, noise is a matter we must consider and this is appropriately controlled through the existing legal agreements. The plan should not infer that the agreements will remain unchanged, as it may be interpreted from the current draft. While the principles, and probably the quantum of operations, will remain for the plan period, changes to operational practice and the consequential agreements may be necessary, often at short notice, to respond to market demands and patron expectations. Such changes will be justified and discussed with the planning authority as fully as possible and may result in new applications and agreement amendments.

Much of the character and use of the circuit and airfield is linked to its heritage, its construction as a World War II Fighter Station and its evolution into a racing circuit through the 1950s and 60s. This heritage is used fully at events such as Goodwood Revival and we believe it is important that the policy (Plan S15) truly reflects that heritage area to allow the Estate flexibility in the authenticity of future events. This larger area is important if the true historic context is to be considered in the context of future proposals as use of the site historically extended well beyond the current site boundary to include areas such as The Valdoe to the North. It would be difficult to include all such land within the policy boundary but we suggest that land forming part of the original airfield is so identified; land to the east of Claypit Lane, north of Lavant Straight and at Fordwater Cottages (as shown on the accompanying drawing) should be included within the policy area. The policy should also recognise that land adjoining the policy area will be used, from time to time, in association with events, but will be subject to strict management as required in compliance with the legal agreements.

Paragraph 4.110 – The Local planning authority will be aware of the Estate's concerns for noise sensitive developments being located close to the motor circuit (the current housing development east of Madgwick Lane being a case in point). Each of the activities at the circuit and airfield generate noise and the concept of a 400m buffer to the circuit has been developed with the council over a number of years. Its inclusion in the local plan as policy is therefore welcomed and supported.

Noise is a very subjective concept and should not be interpreted simply as a measurement with which to comply. There is a complex interrelationship of factors that are at play when noise

becomes a nuisance rather than an acceptable consequence of lawful activity. Unfortunately, the developer at Madgwick Lane chose to ignore such interpretation assuming that if a certain level of noise (according to normal noise levels for residential use) could be proven to exist at a specific point, then residential development was acceptable. This disregarded totally the differing perceptions of noise according to the circumstance and manner in which that noise is experienced by future residents. Consequently, the Local Plan should ensure the buffer is robust and it should be included within policy as well as within the supporting text of paragraph 4.110. We say this because despite the council's removal of land from the previous North East Chichester Strategic Allocation, the land (as discussed elsewhere in these representations) is likely to be subject to development promotion. A large proportion of the land now excluded from the former allocation lies within the buffer area and it is imperative the buffer is given policy robustness, as outlined below.

The buffer zone indicated on the plan diagram (S16) is defined by a line drawn 400m from the edge of the paved circuit. Activities associated with use of the circuit for motor sport (the principle source of significant noise generation) extend beyond the circuit edge to include, run-off areas, and circulation routes and assembly areas outside of the circuit itself. The areas used differ between events and from year to year. To provide appropriate safeguards to sensitive receptors from inappropriate noise disturbance we submit that the buffer should be drawn 400m from the Circuit Policy Boundary (as shown on Plan S15 and as we suggest it is amended).

Inclusion of the buffer within policy is supported by paragraph 182 of the NPPF. It states that planning policies and decisions should ensure new development is integrated effectively with existing businesses, which should not have unreasonable restrictions placed on them as a result of development permitted after they were established. This is exactly the situation we have highlighted in respect of development at Madgwick Lane. Inclusion of the buffer within policy and a recognition of paragraph 182 within the support text, will provide an additional level of robustness.

The airfield operates subject to regulations that differ from the motor circuit; the airspace around Chichester and Westhamnett is distinct from the motor circuit and its operation.

Flight paths will vary according to weather and a larger area is potentially subject to operational activity than occurs from the circuit. There are a number of safeguarding zones around the airfield to be considered when any development around the aerodrome is proposed. These are much more extensive than the 400m buffer zone. The Estate is concerned that the extensive zones may not be widely known and not used consistently. We say this because it is often necessary for the aerodrome management to contact developers who appear unaware or choose to disregard the safeguarding zones (e.g use of cranes during construction). The zone map (copy attached) should be referenced in the local plan encouraging prospective developers to consult the zoning information and satisfy themselves of the suitability of the development prior to any development proposal being made. The aerodrome should be consulted on any development proposal (application) within the zones, subject to the height parameters stated. It must be noted that the zones will be subject to change in respect of the use of drones in the facility of the aerodrome and this will apply to any developments located within the defined zones and the activities of persons within those developments.

Policy S15 is supported in principle but we seek further clarification on elements of the policy and its interpretation as set out below.

Policy S15: Goodwood Motor Circuit and Airfield

The Council is supportive of the role that Goodwood Motor Circuit and Airfield plays in the plan area's economy and in attracting visitors to the area. For as long as current use of the circuit and aerodrome remains an active part of the Estate business model, the Council will permit proposals for outdoor sport, recreation and leisure activities [in connection or ancillary to the](#)

existing motor sport use¹ at Goodwood Motor Circuit and Airfield, provided the proposal does not conflict with other policies of the Plan.

The following criteria will also apply to such proposals:

1. The proposed development must not result in increased noise levels experienced by nearby residential properties over and above that already permitted;
2. The character of the area should be retained and reinforced²;
3. The proposed development should be appropriate in scale and character to the existing uses or buildings³;
4. Any anticipated additional demand for traffic movements should be appropriately mitigated with opportunities for non car based travel options secured and additional private vehicular traffic confined to utilising the existing access

The Council will continue to support the use of the site as an airfield as long as it remains a viable element of Estate activities. Proposals for airfield related development⁴ will be supported where it can be demonstrated that:

- it represents the replacement of existing facilities on the site which are designed to be similar in terms of size and scale to those they are replacing⁵;
- it ensures the ongoing safe and operational efficiency of the airfield and circuit; and
- it would not lead to an increased number of flights in excess of the existing legal agreement or any subsequent management agreement as may be discussed and agreed with the local planning authority from time to time

Any development proposals within the vicinity of the site⁶ must clearly reflect the heritage and character of the airfield and motor circuit and demonstrate how the development would protect, and where possible enhance, the operation and heritage of the site as a motor-circuit and airfield.

- 1 At present the motor circuit and aerodrome are central to the Estate Business model. However, this may change within the lifetime of the plan. While existing uses will continue for the foreseeable future, the Estate wishes to see a greater degree of flexibility within the policy to reflect the commercial and operational needs of the Estate as a whole, including the use and or addition of buildings and the land for other Estate purposes, rather than focus on motor sport or flying as follows:

“The Council is supportive of the role that Goodwood Motor Circuit and Airfield plays in the plan area's economy and in attracting visitors to the area. The Council will continue to support and permit to evolve the existing uses of the circuit and aerodrome. The council will further permit proposals for outdoor sport, recreation, leisure and other Estate activities in connection or ancillary to the existing motor sport and aerodrome uses at the site, or other similar activity related to the Goodwood Brand, its commercial activities and operation, provided the proposal does not conflict with other policies of the Plan.”

- 2 Suggested revision to take account of the wider setting of the former historic airfield (this could be explained in supporting text to include the fields and woodland surrounding the airfield)

“The historic character of the area and its setting context should be retained and reinforced”

- 3 It is recognised that any new development at the site should reflect the existing character and scale of existing development, uses and buildings, but future operational requirements may make this difficult to comply. For example, a new airfield hanger may require a building larger than those erected previously. That is not to say the character of the site would be set aside but that operational (and economic) needs must be balanced against the heritage and character considerations. At present the drafting is too inflexible.

“All new development should be appropriate in scale and character to the site’s historic setting but reflective of contemporary operational needs and requirements. A high standard of design and layout will be required to ensure any new development is not incongruous at the site.”

- 4 Airfield related development will comprise any development reasonably required for the safe and continued viable use of an aerodrome as defined in article 255 of the Air Navigation Order 2009 (interpretation d) or as may be required by the Civil Aviation Authority or other Governing body. This will include development linked to uses and activities at the aerodrome as required by day to day Estate activities.

- 5 In common with (3) above it may not be possible or practical to replace buildings of exactly the same size. Suggest a redraft as follows:

“it is necessary for the continued operation of the site and is designed to complement existing buildings or are designed to be similar in character, size and scale to those they are replacing”

- 6 The vicinity of the site is generally described as land falling within its curtilage, within the 400m noise buffer of the site, or is known to have had a historical connection and or operational linkages to the airfield or motor circuit. Any development that will conflict with the safe, efficient and economic operation of the site will be resisted.

The plan’s acknowledgement of the importance of Goodwood Motor Circuit and airfield and the formal establishment of a 400m noise buffer is welcomed and supported. The policy is broadly acceptable to the Estate but we believe can be strengthened to provide greater robustness as well as flexibility.

Policy S16: Development within vicinity of Goodwood Motor Circuit and Airfield

There is a general presumption against development proposals within 400m of Goodwood Motor Circuit and Airfield, as defined on the policies map. Where development that is not for noise-sensitive is proposed within this area, planning permission will only be granted where it can be clearly and robustly demonstrated that:

1. An acceptable level of amenity, by reason of expected experienced noise and disturbance, will be provided for the future occupiers of the noise-sensitive development within both internal and external areas of the development;
2. that the above levels of amenity are achieved without an adverse impact on the design and layout of the proposed development by reason of noise mitigation measures; and
3. the development will not give rise to matters that may impede, hinder or otherwise compromise the safe and continued operation of Goodwood Aerodrome and Motor Circuit

In considering the above, the Council will be mindful of the particular noise characteristics typically emanating from the site.

The Estate will welcome the opportunity to discuss the above comments with the council in detail.

Yours sincerely

Haydn Morris
For and on behalf of HMPC Ltd