



## 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 X  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:	Page 51 paras 4.75 to 4.79	Policy Reference:	Policy S11
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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:

Local Plan support for the Chichester Horticultural Sector has proved most successful over the past few decades resulting in the industry becoming 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 at the leading edge in the country maintaining its market position. There needs to be sufficient land available for future requirements.

In summary, draft Policy S11 does not provide enough land within the HDA's especially the Runcton HDA for the next 20 years. In order to remedy the position, not only does Policy S11 require updating but the supporting text could be improved further by initiating a different analysis of the Council's evidence base documents thereby adopting a much more positive and powerful statement of Policy that will set out the new vision for the development of the currently acknowledged world renown food producers in the District. The Council's evidence base states clearly that agriculture, horticulture and the food sector in Chichester is of international importance to the sustainability and economy of the District.

What follows is a review of that evidence base, the current draft Local Plan Review 2016-2035 Preferred Approach, with comments and recommendations to provide an appropriate vision for the next 20 years.

### **Local Plan Review and Evidence Base**

The Local Plan Review Spatial Strategy includes a sub-heading 'Addressing Horticultural Needs' (page 51) but in terms of a Spatial Strategy perhaps given the huge importance of the industry, a much wider view should be taken of the Food Cluster within the District taking into account the rapid progress made in agriculture, horticulture and the food sector more generally. The HDA Policy has been a huge success but as the industry has evolved, new policies need to express the vision of the food sector into the future.

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. The Local Plan Review promotes higher education and perhaps a synergy between food production and research could launch yet another innovation within the District.

A new Policy S11 needs to promote, encourage and facilitate future investment in the horticultural and food industry.

In August 2018 correspondence was submitted to CDC (dated the 7<sup>th</sup> 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.

Within Draft policy S11 “**a maximum of 228,000sqm of additional floorspace for glasshouse, packhouse and polytunnel development**” is proposed but 160,000sqm of this floorspace is deemed to have been provided already by virtue of planning permissions granted between April 2016 to March 2018. Leaving just 68,000sqm to be provided during the plan period up to 2035.

On the 19<sup>th</sup> December 2018 CDC’s Planning Committee unanimously approved an extension to Drayton II amounting to 7,500sqm which is bound to be deducted from the 68,000sqm leaving just 60,500sqm up to 2035. A further 92,020sqm of glasshouses (Ref: 14/01721/FUL) which was granted in 2016 does not appear on the GL Hearn Report - Fig 75 and if this permission is taken into consideration, the allocation in the draft Policy S11 has been exhausted. In effect the LPA has granted permission already for 31,550sqm more than the allowance in Policy S11. (Remaining allocation 60,500sqm – 92,020sqm = -31,550sqm)

The premise of considering just the HDA in its historic context is no longer fit for purpose suggesting the spatial strategy would be better to address its wider context.

There have been a number of high-profile developments on the Chichester Food Park in the recent past as the Food Cluster concept gathers momentum;

- the initial packhouse at Drayton II (measuring 11,470sqm) was permitted in 2015)
- the Drayton II extension for a further 7,500sqm was granted planning permission in December 2018
- an extension to Wight Salads of 3,975sqm [Ref: NM/16/02461/FUL dated 16<sup>th</sup> November 2016]
- and the packhouse + greenhouses 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.

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) [NB: Further representations are made in connection with draft Policy DM15 – in summary, it is considered the draft wording is too restrictive inasmuch as the policy only allows for “*ancillary developments*” rather than the broader “*related facilities*” identified in the evidence base.]

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 crucial to the future role of the industry and the way in which the HDA’s (or Food Cluster Needs) 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 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) This change is most welcome. Comments have been submitted earlier last year to remove two other parcels of land from the current HDA but this will be addressed in a further representation on the DM15 Map Review.

In the HEDNA Report (page 188) it is recognised “*There are a number of approaches to estimating the need for glasshouses in the district including linking it to employment and GVA growth in crop and animal production as well as a trend-based growth linked to completions.*” This statement is predicated on the previous sentence that “*the need for glasshouses which are key to the industry’s continuing success.*” It is clear therefore that the Hearn reports accepts there are difficulties forecasting future trends.

The basis for the projected increase in the GL Hearn report (paragraph 11.82 (page 193) and Figure 75 need to be updated insofar as the data available does not account for recent activity in 2014, 2015 or 2016 and does not include more recent activity in 2017 and 2018 for which reason adopting the historic growth average, bearing in mind the need to remain internationally competitive in these uncertain Brexit times, it might be suggested that for the plan period a further 30ha at Runcton or an additional 240,000sqm should be allowed for. Figure 75 is restricted to historical glasshouse permissions but the HDA now provides for other food cluster uses hence the data used to project future requirements is incomplete. This allocation should also allow for the introduction of the diversification of accommodating “related facilities” referred to in the Hearn Report. The Council has removed 9.24ha from the HDA which needs replacing and it is suggested further that the Walnut Tree Farm 3.1ha (northern part) and the Church Field 2.3ha should also be removed and, if agreed, will need to be replaced also making a requirement of 14.64ha just to retain the status quo. The other fundamental point which must be made is that traditionally glasshouse development made up the projected required floorspace but the policy and the food sector have continued to evolve. More importantly the Council’s Planning Committee has recognised that transition.

The non-glasshouse permissions together with the 2016 permission for glasshouses et al (Re:14/01721) below, illustrate that within the HDA, there is over 1.6 million square feet of floorspace created, much in the last few years.

- Merston 95,000 sq ft
- Drayton 123,000sqft
- Unit 1 APS tomatoes 81,000sqft
- Runcton c 100,000sqft

- Unit 2 wholesale fruit and veg 5,400 sq ft
- DWL grain store 40,000sqft
- Barts grain store 40,000 sq ft
- Extant permission Ref: NM/14/01721/FUL for 1,134,393sqft (107,890sqm)

Total: 1,618,795sqft (150,386sqm)

Policies now need to develop further to inspire future generations and sufficient land needs to be allocated to enable future growth of the food sector. In simplistic terms, the Council's Review proposes just 68,000sqm (updated this figure will be further reduced to -31,550sqm) [Policy S11] Page 52, but there is no replacement land of nearly 15ha which should be added. Using the Hearn calculation, 15ha would equate to circa 120,000sqm (paragraph 11.84).

At the very least the 15ha now removed from the existing HDA at Runcton (amendment to Plan DM15 Page 257) needs to be replaced.

The Hearn Report uses an extrapolation figure of 12,000 sqm of glasshouse space over the period 2016-2036 resulting in a need for 240,000sqm or 32ha. This appears to have been based upon a "lower rate of delivery at just over 12,000sqm" during the period 2011-2016 (paragraph 11.83) but, depending upon the period chosen to establish the calculation, the figure could be higher. For example, between 2016-2018 permissions granted for over a 1m sqft of glasshouse and packhouse development indicates the most current trend. Figure 75 suggests there was no development for the 3 year period 2014-2016 which is outdated. Extrapolating data just for the last 5 years on the Runcton HDA alone for 2013-2018 amounts to 1,347,393sqft (125,173sqm) / 5 years = 25,034sqm per annum. Using the latter figure for the period of 2016-2035 would require a total of 500,680sqm or over 60ha. Whilst there is a clear case for greater expansion of up to 60ha in the district we suggest CDC's priority be in enhancing the scale and capacity of the very successful Chi Food Park by extending its HDA boundary to provide a further 30ha.

It is recommended therefore that at least a further 30ha of land is provided in the Local Plan Review at the Chichester Food Park to cater for the Food Sector. Land is currently available at Runcton adjoining the HDA designation and is located within the Council's Landscape Capacity Study as Medium to High suggesting the land is ideal for further development of the food sector.

The Runcton HDA is located in a prime position near the 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.

Under the sub-heading 'Future Outlook' the HEDNA Report refers to the limited consultation undertaken during the preparation of the report. Much of this material is agreed and we would emphasise the contents of paragraph 11.60 that "***There is substantial expansion plans for the local horticultural industry ....on the Sussex Coast***" and "*that the industry would have grown at a much faster rate if was not for the restrictive planning issues placed on them by local government.*"

It is not altogether lost that 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 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.

We attach a PowerPoint plan prepared by Naomi Langford and presented to CDC’s Planning Committee on the 19<sup>th</sup> 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.

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 as a minimum 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.

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 **Sustainability Assessment** prepared by the Council (at paragraph 5.2.6 (page 38)) allows for additional horticultural development of just 68,000m<sup>2</sup> 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]

Attached Plan;

- Proposed Extension to HDA
- 181212 Aerial view of Chichester Food Park

(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 S11** wording to be altered to;- (Changes are in a blue font and / or wording crossed out.)

“Policy S11: Addressing the District’s Food Cluster ~~Horticultural~~ Needs

To support the growth of the ~~agricultural~~, horticultural ~~and food~~ industry within the plan area, including future provision of Research and Development for which specific provision will be made for a maximum of ~~228,000~~ 500,000sq.m of additional floorspace for ~~research and development, grainstore, glasshouse, packhouse, polytunnel development, together with other related industries~~ through the following sources of supply:

Category	Floorspace (m2)
Maximum horticultural floorspace requirement for the full Plan period (April 2016 to March 2035)	228,000
<del>Committed supply of horticultural floorspace within Tangmere &amp; Runcton HAD (permissions granted April 2016 to March 2018)</del>	160,000
<del>Residual requirement to be accommodated during Plan Period at Tangmere &amp; Runcton HDAs</del>	68,000
Further allowance and replacement land at Runcton to facilitate expansion of horticulture and related facilities to support the expanding food cluster at Chichester	250,000
Allowance at other HDA’s in the District (excluding Runcton)	250,000
<b>Total requirement</b>	<b>500,000</b>

Large scale horticultural glasshouses will continue to be focused within the existing Horticultural Development Areas at Tangmere and Runcton ~~together with other related facilities to encourage diversification within the emerging Food Cluster at Chichester~~. The Sidlesham and Almodington Horticultural Development Areas will continue to be the focus for smaller scale horticultural glasshouses. Policy DM15 sets out the detailed considerations for applications in these areas.

~~The anticipated residual requirement of 68,000 of the maximum floorspace requirement will be kept under review during the plan period. Policy DM15 provides the framework within which applications outside of the HDA will be considered.”~~

**Paragraph 4.78 iv** – should be amended to replace the 10 hectares lost to the Runcton DHA to enable future expansion of the food cluster industry.

**Chichester Local Pan 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.

(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> ):	Graham Beck
Date:	7 <sup>th</sup> February 2019