

# **Policy A21 Report [Proposed Submission Local Plan 2021-2039]**

Rolls-Royce Motor Cars Expansion

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## 1.0 INTRODUCTION

- 1.1 This report is provided in support of the representations made by David Lock Associates (DLA) on behalf of Rolls-Royce Motor Cars (R-RMC) to the Regulation 19 version of the Draft Chichester Local Plan 2021-2039 (CLP 2021-2039). It is intended as background evidence to support the inclusion of the site in the plan (draft Policy A21).
- 1.2 Rolls-Royce Motor Cars (R-RMC) is a prestigious global manufacturer of luxury motor cars with a distinctive and strong brand identity, headquartered at Goodwood, Chichester ('R-RMC Goodwood').
- 1.3 Rolls-Royce Motor Cars (R-RMC) has established itself as a major employer within Chichester District, making R-RMC Goodwood an important contributor to the local, district and wider economy as the home of the world's leading luxury car manufacturer.
- 1.4 R-RMC Goodwood has expanded since its arrival in 2003, fully utilising the capacity of the existing site for its manufacturing needs. As part of its continued operations, and to improve its logistics processes, R-RMC now seeks to progress the delivery of its vision for the strategic expansion of R-RMC Goodwood within Chichester District. The proposed expansion would potentially generate additional employment opportunities and further contribute to the local and wider economy, thus helping to strengthen Chichester's economic outlook at a time of national economic uncertainty.
- 1.5 In this context, R-RMC strongly supports the emerging Local Plan's inclusion of approximately 10ha of land (*'the expansion site'*) to the east of the existing R-RMC Goodwood for employment development *'to support the potential growth of manufacturing by Rolls-Royce Motor Cars'* (Policy A21). This draft policy aligns with R-RMC's strategic objectives to further invest in R-RMC Goodwood, Chichester District and the wider UK economy.

### Local Plan context

- 1.6 'Land East of Rolls-Royce' (Policy A21) was prompted by R-RMC through representations made to the Chichester Local plan Preferred Approach 2016-2035 document in February 2019. The site was subsequently included in the Council's Housing and Employment Land Availability Assessment (HELAA), Appendix 3 (site HWH0003a). In terms of suitability, availability and achievability, the 10.6ha site is described as:
- **Suitability:** The site is immediately adjacent to the existing facility and is potentially suitable for the expansion of the existing adjacent business subject to detailed consideration including landscape impact (including setting of the South Downs National Park), archaeology and drainage.

- **Availability:** The site details were updated in 2018 and 2019. The site is considered to be available.
- **Achievability:** The site has been promoted by the current operator and the landowner for specialist employment purposes, and additionally by the landowner for residential and general employment use should the expansion not be required. The landowner has identified the land remains safeguarded at the present time for the expansion of Rolls-Royce.

- 1.7 The site *pro-forma* also confirms the site is likely to be deliverable and indicates an estimate of approximately 7 hectares of net developable land and 28,000sqm of floorspace. The specific inclusion of the site in Policy A21 has also been included in the Sustainability Appraisal, prepared by AECOM, in terms of the detailed consideration of employment land in Appendix 2 and the site options RAG analysis in Appendix 4. Overall, the Sustainability Appraisal supports the overall strategy adopted by the Council in its Local Plan.
- 1.8 The remainder of this report describes the nature of the site, the emerging proposals and provides further assessment of the proposed inclusion of the expansion site against the key national policy tests, namely site suitability, site availability and development achievability in order to demonstrate that Policy A21 is sound in all respects.

## 2.0 OVERVIEW OF EXISTING SITE AND ITS CHARACTERISTICS

### Site location and description

- 2.1 The expansion site is approximately 10ha of predominantly agricultural land. It is bounded by Stane Street/Roman Road to the south, the existing R-RMC to the west, agricultural land and woodland to the north, and a bridleway and small-scale business to the east at Sidelsham Farm (comprising 'Cast Iron Coffee Roasters' and 'Barkingham Palace Gun Dogs'). The village of Westhampnett lies further to the west, beyond the existing R-RMC building and further to the north is Goodwood motor circuit and aerodrome. Maudlin is an adjoining hamlet that lies to the east and south-east of the site, built around the confluence of the Stane Street/Arundel Road junction. The site is approximately 3km from the centre of Chichester (to the south-west).
- 2.2 The site itself is characterised by mostly flat agricultural land but there are some tree groups and hedgerows, especially along the site boundaries. Public Right of Way (PRoW) FP417 crosses the site running northeast from the south-west.

### Site Characteristics

#### Transport and Movement

- 2.3 The existing R-RMC Goodwood Plant is currently accessed from The Drive, which is a dedicated arm on the Madgwick Lane roundabout. The roundabout also links to Claypit Lane, which is connected to Stane Street to the south. Madgwick Lane also provides onward access to the Chichester Bypass, the A27 and services and facilities of Chichester.
- 2.4 While The Drive is the main access for executives and visitors, the main access for staff and deliveries is via Stane Street to the south of the site. Staff car parking is also available to the west, of Claypit Lane.

#### Flood and Drainage

- 2.5 The Environment Agency's (EA) Flood Risk Map shows that the expansion site lies entirely within Flood Risk Zone 1, indicating a very low probability of flooding from rivers and sea. This is considered a preferable location for development. Environment Agency records also indicate that the site is at the lowest risk of flooding from other sources including surface water and reservoirs.

### Ground Conditions

- 2.6 The expansion site largely comprises Made Ground and superficial deposits generally consisting of a gravelly clay / clayey gravel with flint gravels, and occasionally chalk gravels with depth. In some areas, this is underlain by a firm grey and/or red clay (Lambeth Group).
- 2.7 The site is typical for the area in terms of geology and likely geotechnical properties. There is the potential for dissolution features associated with the Chalk and Lambeth Group interface towards the north of the site, but any risk is considered mitigatable.
- 2.8 In terms of groundwater, the site is not situated within an EA designated Groundwater Source Protection Zone. The groundwater within the bedrock underlying the northern half of the site (Chalk Formation) is classified as a Principal Aquifer, whereas the superficial deposits and the Lambeth Group Bedrock in the southern half of the site are classified as Secondary A Aquifers. Overall, the site is considered to be situated in an area of moderate sensitivity with respect to groundwater resources due to the underlying Secondary A and Principal Aquifers.
- 2.9 Preliminary site investigations indicate that there is no visual or olfactory evidence of contamination in soil or groundwater within the site. There is also no indication of waste or other typical landfill materials.

### Landscape and Ecology

- 2.10 The expansion site is a mix of agricultural land, woodland and hedgerows. It contains habitat suitable to support likely populations of protected species.
- 2.11 There are no designated ecological or landscape sites located within the site boundary. There are 23 statutory designated sites within 10km of the site, including the Singleton and Cocking Tunnels Special Area of Conservation (SAC) approximately 7.4km to the north of the site. The South Downs National Park lies approximately 880m north of the site boundary.

### Heritage

- 2.12 There are no designated statutory or non-statutory heritage assets on the expansion site. Relevant designations in the vicinity include:

- Goodwood Estate - an early 18th century woodland garden set within an 18th century park containing significant 18th century buildings and is designated as a Grade 1 Registered Park & Garden.
- The closest conservation area is Chichester whose western boundary lies approximately 1.4km to the west of the Site.

2.13 There are no listed buildings on the proposed development site, and the closest listed buildings lie along Roman Road (to the south of the site):

- The Old Post House (Grade II listed)
- The Coach and Horses Public House (Grade II listed)
- Maudlin Cottage (Grade II listed)

2.14 Overall, there are not considered to be any physical characteristics or designations that preclude development, subject to detailed assessment, mitigation and careful and sensitive design. Detailed investigations are being undertaken as part of a full Environmental Impact Assessment (EiA) and section 3 and 4 of this report refer to this in more detail with the emerging proposals in the context of the environmental scoping working undertaken to date and site suitability considerations.

### 3.0 THE EMERGING PROPOSALS

3.1 Through an iterative process, R-RMC is developing its proposals in anticipation of a planning application submission later this year.

3.2 At this stage, the detailed proposals are still emerging and exact details are yet to be established. However, it is anticipated that development could facilitate the following:

*Development of new buildings, car parking, creation of new vehicular access from Roman Road and other associated works and infrastructure including earthworks, drainage, utilities and landscaping. This could include the extension and reconfiguration of the existing Goodwood Plant for car production (including design, development and assembly) and other ancillary uses.*

3.3 A phased approach to development is being considered, comprising the construction and operation of an interim phase(s) up to full development ('full scheme'). The full scheme is described in more detail below.

#### Use

3.4 The proposed development would operate under Use Class B2 (General Industrial) B8 (Storage of Distribution), E (g) offices, research and development and light industrial of the Use Class Order and ancillary uses.

#### Amount

3.5 The development will create significant additional floorspace across the expansion land, which comprises 10.2ha. As indicated above, there will be a smaller component of the development, which will refurbish and consolidate development on the existing site.

#### Layout

3.6 The proposed development will likely include a range of manufacturing uses, and new logistics area, energy centre and associated works including car parking.

3.7 The proposals also propose a landscaped bund to the north and east of the proposed development that will incorporate planting and potentially drainage features. Planting is also proposed to the south.

3.8 The existing R-RMC building may also be subject to some refurbishment works.

#### Scale



- 3.9 The proposed building will be approximately 36.65m (AOD) in height, which will be slightly higher than the existing development. This is the maximum height that will apply across all phases of potential development.

#### Appearance

- 3.10 The external cladding for the proposed building is yet to be determined, but the intention is to reflect the exterior of the existing R-RMC building while being sympathetic to the physical context of the site location. Detailed consideration is also being given to establishing a roof combining landscape (a 'living roof') and photovoltaics.

#### Landscape

- 3.11 The proposed development is likely to include a landscaped bund to the north, east and potentially south of the proposed new buildings. The scheme seeks to deliver enhanced landscape planting, comprising trees, mixed scrub, and native or nectar-rich species, and biodiversity enhancement measures as appropriate.

#### Access

- 3.12 A new vehicular access from Roman Road will be provided to serve the new development. In addition, the scheme proposes the realignment of the existing Public Right of Way (PRoW) subject to a separate application to West Sussex County Council or Secretary of State for Transport. The PRoW will be retained within the site boundary but diverted within a new landscape setting to retain a connection between the hamlet of Westerton (north of the R-RMC site) to Maudlin and Westhampnett to the south.

### **Expansion Site Draft Allocation**

#### Policy A21 – Land East of Rolls-Royce

- 3.13 It is acknowledged that, if adopted, any proposal on the expansion site would need to be in accordance with Policy A21 (Land East of Rolls-Royce).
- 3.14 The draft policy sets out the range of uses that would be acceptable on the site, including low volume / high value manufacturing; just-in-time sequencing of production parts; supporting logistics space; ancillary offices for the manufacturing activity; and ancillary and replacement car parking. The emerging proposals outlined above reflect these uses and would therefore align with the principle of the policy.
- 3.15 The draft policy also sets out six requirements for any employment development on the site. These policy requirements, together with R-RMC's response and approach, are summarised in table 1 below.

**Table 1 – Policy A21 Requirements**

<b>Policy Requirement</b>	<b>R-RMC response</b>
It will support low volume, high value manufacturing	The proposed development would facilitate the strategic expansion of the R-RMC Goodwood Plant and its manufacturing operations.
It has a direct connection to Rolls-Royce Motor Cars	The proposed development would facilitate the strategic expansion of the R-RMC Goodwood Plant and its manufacturing operations.
Increased traffic generation is minimised and mitigated by the use of sustainable transport measures	Transport impacts and any potential mitigation will be assessed through a Transport Assessment, the scope of which will be agreed with West Sussex County Council (WSCC) and National Highways (NH).
The highest design and environmental standards are used to complement the existing building	R-RMC is committed to achieving outstanding quality of design, a sensitive landscape response and excellent standards of environmental performance. More design work is to be undertaken, but the intention is to compliment the exterior of the existing R-RMC building while being sympathetic to the physical context of the site location.
Any adverse impacts on the landscape and setting of the South Downs National Park are first avoided, then mitigated	South Downs National Park (SDNP) has been identified as a sensitive receptor. A Landscape and Visual assessment will be prepared to consider any impact and identify any necessary mitigation measures (where impact cannot be avoided).
Access into the South Downs National Park is maintained through diversion and protection of the existing footpath	The Public Right of Way (PRoW) would be retained within the site boundary but would be diverted to provide an improved quality of connection between the hamlet of Westerton (north of the R-RMC site) to Maudlin and Westhampnett to the south and into SDNP.

## 4.0 SITE SUITABILITY

- 4.1 The Planning Practice Guidance (PPG) sets out the factors that can be considered when assessing a site's achievability. In particular, it states:

*"A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.*

*When considering constraints, plan-makers may wish to consider the information collected as part of the initial site survey, as well as other relevant information, such as:*

- *national policy;*
- *appropriateness and likely market attractiveness for the type of development proposed;*
- *contribution to regeneration priority areas;*
- *potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation."*

*(PPG Paragraph 018 Reference ID: 3-018-20190722)*

- 4.2 The relevant aspects of this guidance are considered below.

### National Policy

- 4.3 National policy is set out within the National Planning Policy Framework (NPPF) which, at its heart, contains a presumption in favour of sustainable development. The NPPF is supplemented by the Planning Policy Guidance (PPG).
- 4.4 Paragraph 7 of the NPPF establishes the purpose of the planning system, which is to contribute to the achievement of sustainable development performing an economic, social and environmental role.
- 4.5 Section 6 of the NPPF identifies the need to build a strong and competitive economy. It states that "planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt" and planning policies should recognise and address specific locational requirements of different sectors.
- 4.6 R-RMC has established itself as a major employer within Chichester District, contributing to the local, district and wider economy. Since its arrival in 2003, the existing facility has expanded, increasing its output and production capacity to respond to market demand.
- 4.7 R-RMC has made a significant investment in R-RMC Goodwood over the years, including £40million in structural plant changes for the Ghost model (2009) and £10million in

extending the assembly hall (2013). It retains an employment base, which helps strengthen the local and wider economy.

- 4.8 As R-RMC's operational requirements increase, it is important that the business is able to invest in its existing plant and expand to support its continued growth. These proposals would enable R-RMC to facilitate this growth in a suitable and sustainable location, securing future operational resilience and efficiency. The delivery of this expansion and additional investment in the location, including the value of potential new direct and indirect employment opportunities, is a key justification for the Policy A21 in the Plan and should also be given significant weight as a material consideration in favour of the proposals, in line with NPPF paragraphs 81-85.

### Appropriateness

- 4.9 The expansion site is located directly adjacent to the existing R-RMC Goodwood site, which is an established employment use. Therefore, development on the expansion site would sit well within the context of the growth of the wider R-RMC site as the logical and most suitable location for expansion.
- 4.10 Draft Policy A21 is clear that employment development on the expansion site would be *'to support the potential growth of manufacturing by Rolls-Royce Motor Cars'*. Any proposal would positively reflect this position and enable R-RMC to meet its operational needs and secure the future of this important use and economic driver in the District.

### Potential Impacts

- 4.11 In developing its emerging expansion proposals, R-RMC has commissioned a number of technical assessments to be undertaken at the site. The table below provides a summary of each relevant discipline, but the overarching outcome is that, in principle and subject to further assessment and potential mitigation, there are no constraints that would preclude development from occurring at the site. These technical assessments have therefore been fundamental in demonstrating the physical suitability of the site.
- 4.12 In addition to this, R-RMC requested and received an EIA Scoping Opinion from the Council on 6<sup>th</sup> February 2023 (ref: WH/22/03126/EIA). This has been helpful in establishing the topics that should be scoped into an Environmental Statement. The Council, in consultation with relevant statutory consultees, generally considers R-RMC's approach to future technical assessment acceptable. The Council's scoping approach is included with this report as Appendix 1.

Table 2 – Summary of Technical Assessments / Scoping Outcome

Discipline	Position Summary
Air Quality	<p>The site is not located within an Air Quality Management Area (AQMA). However, it is acknowledged that potential air quality impact (e.g., from construction activities or vehicle emissions) on sensitive receptors (such as residential properties and protected conservation areas) need to be considered.</p> <p>It is agreed through the Scoping Opinion that any application would be supported by an Air Quality Assessment, the results of which will help identify any necessary mitigation measures and/or enhancement measures.</p>
Archaeology and Heritage	<p>An Archaeological Desk-Based Assessment (DBA) and geophysical survey have been undertaken for the site. The DBA does not find any archaeological remains of sufficient importance to prevent or significantly constrain the development of the site. However, it does identify the potential for the site to contain previously unidentified archaeological remains, with further archaeological works, including trial trenching, likely required. R-RMC is in the process of agreeing the scope of these works with the County Council prior to any development, with the results of any intrusive works then informing the need for and nature of any future mitigation works.</p> <p>Through its Scoping Opinion, the Council agrees with the Environmental Scoping Report on the fact that the development will have no direct physical impacts on any designated heritage assets, but that there is the potential that designated heritage assets may experience indirect impacts, through changes to their wider setting, thus resulting in potential harm to their significance.</p> <p>An Environmental Statement will identify any necessary mitigation measures and/or enhancement measures and would help to inform the landscape designs of any development, where practicable, so as to avoid areas of identified archaeological material and to limit the visual impact of any development to the setting of nearby heritage assets and historic views.</p>
Ecology	<p>A Preliminary Ecological Appraisal (PEA) has been prepared for the site. This Phase 1 habitat survey and desk study confirms that the site is of nature conservation importance up to the Local Level and contains habitat suitable to support populations of protected species including reptiles, great crested newts, hedgehog, badger and nesting birds.</p> <p>The PEA also sets out its recommendations, including survey work, that need to be undertaken prior to development. The Scoping Opinion confirms that the surveys proposed are suitable and adequate. The detailed surveys have since progressed on site and are on-going.</p>
Ground Conditions, Soil, Contaminated Land and Land Quality	<p>A Generic Quantitative Risk Assessment (GQRA) and Phase 1 Environmental Site Assessment have been undertaken for the site. The assessments highlight that there is no visual or olfactory evidence of contamination in soil or groundwater within the site. There is the potential for dissolution features towards the north of the site, but any risk is considered mitigatable at construction stage.</p>

	<p>In terms of groundwater, the site is not situated within an EA designated Groundwater Source Protection Zone. The groundwater within the bedrock underlying the northern half of the site (Chalk Formation) is classified as a Principal Aquifer, whereas the superficial deposits and the Lambeth Group Bedrock in the southern half of the site are classified as Secondary A Aquifers. Overall, the site is considered to be situated in an area of moderate sensitivity with respect to groundwater resources due to the underlying Secondary A and Principal Aquifers.</p> <p>The current and former use of the site indicates that there is a low potential for significant or widespread soil and groundwater contamination. No indication was found of waste or other typical landfill materials, although it is acknowledged that a site investigation would be required to conclusively rule out a landfill on the eastern area of the site. As agreed through Scoping, any application would be subject to a Preliminary Risk Assessment.</p>
Flooding	<p>The EA's Flood Map for Planning indicates the site is situated entirely within Flood Zone 1, which is defined as land having a less than 0.1% annual probability of river or sea flooding. The risk of flooding from fluvial sources is therefore low.</p> <p>There are no watercourses within the site boundary, and the risk of surface water flooding is low overall. Any increased surface water discharge would be accommodated by a drainage strategy. Subsequently, it is agreed through the Scoping Opinion that any application would be supported by a Flood Risk Assessment and drainage strategy and design.</p>
Landscape and Visual	<p>Some sensitive receptors have been identified, including the designated landscapes of the South Downs National Park (SDNP), International Dark Sky Reserve (IDSR) and the Goodwood Estate Registered Park and Garden (RPG). There are also some leisure-based and residential visual receptors in proximity of the site.</p> <p>R-RMC is in the process of assessing the likely landscape and visual impacts of the proposed development, in consultation with CDC, SDNP, and other relevant statutory and non-statutory consultees.</p> <p>An Environmental Statement will also identify any necessary mitigation measures and/or enhancement measures (dependent on the outcome of a Landscape and Visual assessment) and will involve the creation of an appropriate landscape setting based on the successful design principles established by the existing R-RMC Goodwood site.</p>
Minerals	<p>A Minerals Resources Assessment (MRA) has been prepared for the site. The MRA concludes that there is no economically recoverable mineral resource contained in the prospective expansion area. Therefore, redevelopment of the application site including earthworks and land profiling suitable for the provision of permanent buildings and associated works will not sterilise any mineral of economic value.</p>

Noise	Sensitive receptors have been identified around the site, including those related to existing residential buildings and businesses. A baseline noise survey will be undertaken to determine the existing noise levels on site and at the nearest noise sensitive receptors, together with a noise assessment. Any necessary mitigation measures and/or enhancement measures can then be identified.
Transport	Any planning application is expected to be supported by a Transport Assessment (TA) to quantify the impacts of the proposed development on the relevant receptor groups and will recommend mitigation and enhancement measures where necessary. The scope of the TA is being agreed with West Sussex County Council (WSSCC) and National Highways (NH) through a Transport Scoping Report.

### Summary of suitability

- 4.13 Overall, the site can be considered suitable when considered against the national policy guidance tests (set out in the PPG paragraph 018 Ref 3-018-20190722). The allocation of the site for employment-related uses in this location is consistent with national policy and, in particular, will help deliver the Government's objectives of securing a strong and competitive economy. The location is appropriate by virtue of its proximity to the existing R-RMC Goodwood site and the absence of any overriding constraints and environmental designations. R-RMC is in the process of undertaking more detailed design work and full EIA to support a planning application, and work to date confirms that this is a suitable location for the proposed development, subject to appropriate mitigation and sensitive design.

## 5.0 SITE AVAILABILITY

- 5.1 The Planning Practice Guidance (PPG) sets out the factors that can be considered when assessing a site's availability. In particular, it states:

*"A site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.*

*The existence of planning permission can be a good indication of the availability of sites. Sites meeting the definition of deliverable should be considered available unless evidence indicates otherwise. Sites without permission can be considered available within the first five years, further guidance to this is contained in the 5-year housing land supply guidance. Consideration can also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions."*

*(PPG Paragraph 019 Reference ID: 3-019-20190722)*

- 5.2 The expansion site is in single ownership, negating the need for any land assembly negotiations. R-RMC and the landowner (The Goodwood Estate) are in agreement and are working closely on the emerging proposals.
- 5.3 In addition, there are no existing buildings or structures on the site to delay or impact developability. Therefore, subject to planning permission and related consents, R-RMC is in a position to progress on site without delay.



## 6.0 SITE ACHIEVABILITY

- 6.1 The Planning Practice Guidance (PPG) sets out the factors that can be considered when assessing a site's achievability. In particular, it states:

*"A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period."*

*(PPG Paragraph 020 Reference ID: 3-020-20190722)*

- 6.2 As previously outlined, R-RMC has already committed resources towards the preparation of a range of technical assessments. An EIA Scoping request has been requested and the Council has issued its Scoping Opinion. There is also a commitment to ongoing liaison with the Council and relevant stakeholders.
- 6.3 Progress to date has informed R-RMC's emerging proposals, with a planning application expected to be submitted later this year (2023) with planning permission sought by early 2024. Soon after submission of the planning application, an application to divert the Public Right of Way will be made with a view to achieving the Order as soon as possible following grant of planning permission. Enabling works would then commence in 2024, with construction works expected to follow in 2025. Part of the site is expected to be first operational in 2026, with additional phases operational in subsequent years – to be defined once the development phasing is confirmed. There is therefore a clear intention to progress and deliver development within the next few years.
- 6.4 Finally, any proposals at the site would be in relation to the global manufacturer's existing operations and to facilitate the expansion of the R-RMC Goodwood Plant. As R-RMC's operational requirements increase, it is important that the business is able to invest in its existing plant and expand to support its continued growth. Therefore, there is an identified need which R-RMC is keen to meet through the delivery of this expansion.

## 7.0 CONCLUSION

- 7.1 This report has been submitted on behalf of R-RMC in support of the representations made to Policy A21. The expansion site presents an important opportunity to facilitate the expansion of R-RMC and support the increasing operational requirements of the business. As a major employer in the local and wider economy, this expansion is considered beneficial to the economic growth of the district.
- 7.2 The policies of the NPPF articulate the Government's vision for growth and make clear the commitment to a presumption in favour of sustainable development. The proposed development is consistent with a number of the established core planning principles and can be seen to accord with the underlying intentions of the NPPF, especially in supporting objectives on economic competitiveness.
- 7.3 The site is in a suitable location for development and has been assessed through the Council's HELAA and SA processes. There are no significant constraints that would preclude development in this location, and given the presence of the existing facility, expansion at this location is considered to be a suitable and sustainable approach to delivering R-RMC's vision. Through the proposed development, there also exists an opportunity to provide an enhanced landscape setting and improved connectivity through the PRoW diversion.
- 7.4 In addition, the site is available now and has a realistic prospect of being delivered. The site is in single ownership and there are no existing buildings on site to delay or impact developability. R-RMC has committed resources towards the preparation of technical assessments with a view to submit a planning application later this year. Subject to planning consent, enabling works would commence in 2024 with construction works expected to follow in 2025. There is therefore a clear intention to progress and deliver development within the next few years.
- 7.5 Therefore, R-RMC strongly supports the emerging Local Plan's inclusion of the approximately 10ha expansion site for employment development relating to R-RMC's manufacturing operations. This presents a significant opportunity for R-RMC to further invest in R-RMC Goodwood, Chichester District and the wider UK economy.

**APPENDIX 1 CHICHESTER DISTRICT COUNCIL (CDC) SCOPING OPINION**

06/02/2023

Jeremy Bushell  
Tel: 01243 534631  
Email: [jbushell@chichester.gov.uk](mailto:jbushell@chichester.gov.uk)  
CDC Ref: WH/22/03126/EIA  
BY EMAIL ONLY

Dear Mr Brown,

**EIA Scoping Opinion under Regulation 15 of the EIA Regulations in relation to the proposed development to the east of R-RMC's current site. Land at Rolls Royce Motor Cars, The Drive, Westhampnett, Chichester.**

I refer to your request for a Scoping Opinion in respect of a proposed development to the east of the current Rolls Royce Motor Car manufacturing site at Westhampnett submitted under the provisions of Regulation 15 of the Town and Country Planning Environmental Impact Assessment Regulations 2017 (as amended) (EIA Regulations), and Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) (Habitat Regulations). The request was validated on 09.12.2022.

This request for a Scoping Opinion is supported by the following reports and documents:

- Environmental Impact Assessment (EIA) Scoping Report (December 2022, RUK2022N00149-RAM-RP-00023), Ramboll UK Ltd
- Appendix 3 – Ecology Baseline Report and Surveys, Ramboll UK Ltd
- Appendix 4 – Archaeology Desk Based Assessment, Ramboll UK Ltd
- Appendix 7 – Ground Conditions Baseline Reports and Survey, Part 1 and Part 2, Ramboll UK Ltd
- Draft Site Location Plan – BMW072/001 Rev A 29.09.22, David Lock Associates

The Council's Scoping Opinion

In accordance with Regulation 15 (6) of the EIA Regulations, before adopting a scoping opinion, the authority must take into account:

- a) any information provided by the applicant about the proposed development;
- b) the specific characteristics of the particular development;
- c) the specific characteristics of development of the type concerned; and
- d) the environmental features likely to be significantly affected by the development.

Consultations were sent to the following statutory and other consultees:

- The Environment Agency\*
- National Highways\*

Mr Charlie Brown  
David Lock Associates Limited  
50 North Thirteenth Street  
Central Milton Keynes  
MK9 3BP

- WSCC Highway Authority\*
- CDC Archaeology Officer\*
- CDC Environmental Protection\*
- CDC Environmental Strategy\*
- CDC Coastal and Drainage Engineer\*
- CDC Economic Development Officer
- Southern Water\*
- South Downs National Park Authority

Key and relevant points from the advice received from these consultees are referred to, as required, below. Those consultees who provided a response are marked with an asterix\*. The full responses from these consultees accompany this letter.

### **The Site and Its Surroundings**

The site the subject of the Scoping Request is outlined in red on the Draft Site Location Plan and comprises approximately 22.79 hectares (ha). It includes an area of approximately 10 ha of undeveloped land immediately to the east of the existing Rolls Royce manufacturing plant. Within the western half of the site is the existing headquarters and manufacturing plant of R-RMC's with its associated surface car parking and landscaping. The site is approximately 22-25 m above Ordnance Datum (AOD) which rises to approximately 29 m AOD on the mounded area at the eastern side of the existing manufacturing facility.

The 10 ha land parcel comprises an agricultural field, open grassland, wooded areas and a tree and shrub planted artificial soil mound. The mound which is directly east of the manufacturing plant was formed during the construction of the existing facility on the site to provide a landscaped bund and screening from the wider environment. The 10 ha site is bounded to the east by Stane Street and to the north by Sidengreen Lane which is also a bridleway (no. 3583). The site is bisected N-S by the line of public footpath no. 417.

The site is not located within a Site of Special Scientific Interest (SSSI), National Park, Area of Outstanding Natural Beauty (AONB), World Heritage Site (WHS) or a Scheduled Monument and is not subject to any statutory or non-statutory designations for nature conservation or heritage.

The site is situated approximately 750 m south of the boundary of the South Downs National Park (SDNP) and is within the buffer zone for the Singleton and Cocking Tunnels SAC, designated for their populations of Bechsteins and Barbastelle bat species.

A comprehensive list of designated ecological sites within proximity of the site is included in your Scoping Report and includes:

- Chichester and Langstone Harbour SPA, SSSI and Ramsar 4.9 km to south west;
- Singleton and Cocking Tunnels SAC and SSSI 7.4 km to north
- Eartham Pit, Boxgrove SSSI 3.6 km to north east
- Halnaker Chalk Pit SSSI 3.7 km to north east
- Brandy Hole Copse LNR 2.7 km to south west

The whole R-RMC site is located within Environment Agency Flood Zone 1. The Council's records indicate the site does not overly or is in proximity to any Source Protection Zone. Preliminary indications suggest that the agricultural land classification of the site is predominantly grade 3 with a smaller proportion of grade 2 at the northern part of the 10 ha parcel, but this will need to be confirmed through further independent testing.

There are several listed buildings and heritage assets within the vicinity of the site as recorded in Section 10 of the scoping report. Those listed buildings in the more immediate vicinity include:

- Grade II The Old Post House
- Grade II The Old Coach and Horses
- Grade II Maudlin Cottage/House
- Grade II 20 and 21 Westhampnett Road
- Grade II 22 and 23 Westhampnett Road

In addition, the southern site boundary is immediately adjacent to and partly within an Archaeology Priority Area (the Roman road at Stane Street). Further Archaeological Priority Areas are located approximately 285 metres away at Goodwood Airfield to the NW and a Roman/Iron Age settlement site approximately 90 m to the west. The Conservation Areas at Chichester, Tangmere, Oving and Boxgrove are located 1.4 km, 1.25 km, 1.93 km and 1.75 km respectively from the nearest site boundary. The 'Devils Ditch' earth embankments are located approximately 1.5 km north of the site. There are no Registered Battlefields on or within a 1km radius of the Site. The grade I listed Historic Park and Gardens at Goodwood House are just beyond a 1 km radius taken from the nearest part of the red lined site.

### **The Proposed Development**

The submitted Scoping Report describes the development proposed as follows:

*'Extension and reconfiguration of existing headquarters facility for car production (including design, development and assembly) and other uses. Development to include construction of new buildings, car parking, creation of new vehicular access from Roman Road and other associated works and infrastructure including earthworks, drainage, utilities and landscaping'*

The submitted indicative site plan does not show a footprint of new built form only 'areas' for proposed built development and landscaping. Neither are indicative elevations provided which might indicate form and massing. The text in the Scoping Report sets out what are anticipated to be the broad parameters for the proposals. These are for a landscaped bund to the north, east and potentially south of the proposed new building/s within an enhanced landscape comprising trees, mixed scrub and biodiversity measures. The proposed new buildings would be up to approximately 36.65 m (AOD) in height which is approximately 1.5 m higher than the existing facility. The external elevations of the building will reflect and complement the existing building. The roof on the new building will potentially reflect the sedum roof on the existing building and incorporate photovoltaics. The new building will be designed to respond sympathetically to the existing and proposed new landscape setting. It is anticipated that opportunities will be taken to refurbish the existing R-RMC facility as well as building the new works. A new (second) vehicular access would be created onto Stane Street to service the development. The existing Public Right of Way (PROW) 417 would be retained within the red lined site boundary but diverted to allow for the built form.

The development is anticipated to be phased with a projected commencement on site in 2024 and construction works starting in 2025. R-RMC's expect the site to be first operational in 2026 with additional phases operational in subsequent years.

## **Topics to be included within the Environmental Statement**

Schedule 4 of the EIA Regulations details the information to be included within an Environmental Statement, which it is not necessary to reproduce here. This Scoping Opinion, produced under Regulation 15 of the EIA Regulations, describes the scope and level of detail of the information to be included within the ES.

The Local Planning Authority has reviewed the submitted Scoping Report by Ramboll and accompanying information and concludes that the following topics have the potential to result in significant effects and should be scoped into the ES.

### **Ecology and Biodiversity**

The Council's Environmental Strategy Unit (ESU) has considered the Environmental Scoping Report and has advised that the survey work in the Preliminary Ecological Appraisal (PEA) is suitable for this proposal. The surveys to be scoped into the ES include the following;

- Botanical Survey
- Emergence and Activity surveys for bats
- Badger Survey
- Dormice Survey
- Reptile Survey
- Water Vole Survey
- Bird Survey
- Great Crested Newts Survey

ESU confirms it will require appropriate mitigation strategies for any species found on site.

The ES will also need to cover the following key components:

- Consideration and safeguarding of green infrastructure and connectivity across the site and into the wider landscape including the district identified wildlife corridors.
- Biodiversity Net Gain - Habitat enhancements onsite following the Biodiversity Net Gain metric. Should a planning application be likely to be determined after November 2023, the provisions of the Environment Act 2021 relating to Biodiversity Net Gain will be mandatory. Notwithstanding the provisions of the Environment Act, paragraph 174 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. The ES should use an appropriate biodiversity metric such as Biodiversity Metric 3.0, together with ecological advice, to calculate the change in biodiversity resulting from the proposed development and demonstrate how the proposals can achieve a net gain.
- Impacts from climate change and planning for the future – sustainable construction and design
- Habitats Regulations Assessment – The site is located within the Singleton and Cocking Tunnel SAC buffer zone and therefore bat surveys will need to be undertaken to assess the impact this development may have on any SAC species potentially using the site. This is to enable the Council as the competent authority under the Habitats Regulations 2017 to undertake a Habitats Risk Assessment (HRA) to assess the impact of the proposals. Whilst the HRA is a separate assessment, carried out under a separate suite of regulations to the

EIA regulations, the potential impacts, and the potential effects of any proposed mitigation measures, must be included within the EIA.

### **Landscape and visual impacts.**

The methodology for the Landscape and Visual Impact Assessment (LVIA) should be undertaken in accordance with the latest published version of the 'Guidelines for Landscape and Visual Impact Assessment' from the Landscape Institute and the Institute of Environmental Management and Assessment. For National Parks and AONBs, including impacts to the settings of these designated areas, the ES should include assessment of the effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. The ES should include an assessment of landscape, amenity and visual impact including landscape and visual setting of the SDNP.

The ES should also refer to the relevant National Character Areas<sup>1</sup> in addition to the landscape character areas of West Sussex<sup>2</sup>. These provide a basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

In addition, the ES should include an assessment of the impacts on Heritage Landscapes (specifically, any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding, scenic, scientific, or historic interest).

The scoping report has considered the landscape character areas and sensitive receptors which have the potential to be affected by the scheme. The degree of landscape and visual effects can vary considerably during the life of the project particularly during a development of this scale which is likely to have a phased implementation, and so the assessment will need to include different stages of the proposed scheme to identify and assess the extent of overall impacts.

Details have been provided within the scoping report which show 10 proposed viewpoints selected to represent the places from which the proposed new development may be seen. The scoping report makes it clear that verified views are being prepared for each of the viewpoints and will consider both the summer and winter condition. Further viewpoints may need to be added depending on the extent of winter views, particularly from within the South Downs National Park and depending on observations from the SDNPA once its consultation comments are received.

### **Impact on heritage assets**

The Council's Archaeology Officer agrees that the ES should include an assessment of the likely effects of the development on archaeology and the historic environment as outlined in Section 10 of the scoping report. The Council agrees with the Environmental Scoping Report on the fact that the development will have no direct physical impacts on any designated heritage assets, but that there is the potential that designated heritage assets may experience indirect impacts, through changes to their wider setting, thus resulting in potential harm to their significance.

### **Climate change adaption**

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide

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<sup>1</sup> National Character Area profiles - GOV.UK ([www.gov.uk](http://www.gov.uk))

<sup>2</sup> Landscape character assessment of West Sussex - West Sussex County Council



adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e., what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g., to adapt to flooding, drought and heatwave events) and habitat creation should be considered. The ES should set out the measures that will be adopted to address impacts.

In addition, the UK has legally binding GHG reduction targets, seeking to achieve net zero by 2050, and Environmental Impact Assessments must therefore give due consideration to how a project will contribute to the achievement of these targets. The 2022 IEMA guidance 'Assessing Greenhouse Gases Emissions and Evaluating their Significance' states that where an ES is to be undertaken based on other factors, it is envisaged that the assessment would include greenhouse gas emissions at the scoping stage as a matter of good practice.

### **Soil, Contaminated Land and Land Quality**

The Council's Environmental Protection officers have been consulted and have advised that the approach detailed in section 5.2 of the Environmental Scoping Report is acceptable and the preliminary risk assessment that will result as part of this study will determine what future conditions would be deemed appropriate in order to develop the site.

The Council will also expect the ES to include details of the agricultural land quality of the site with details of the Agricultural Land Classification.

### **Lighting**

Potential light pollution is an ecological impact consideration and should be considered in the ES. The potential light pollution impact upon neighbouring receptors should also be fully assessed and reviewed in the ES. The Council's Environmental Protection Officer identifies that any proposed lighting scheme shall set out how the design of the lighting shall not exceed thresholds from the Institute of Lighting Professional's 'Guidance Notes for the Reduction of Obtrusive Light (Guidance Note 01/20)' for the appropriate Environmental Zone.

### **Air Quality**

The Council's Environmental Health Officer has advised that the approach described in Section 6 of the Environmental Scoping Report is acceptable. Once the assessment of impacts has been made, it would be expected that mitigation measures would be proposed to mitigate the impacts on local air quality, both during the construction phase and the operational phase. Conditions would then be applicable in order to ensure that the relevant mitigation measures were put in place at the development.

### **Noise and Vibration**

The Council's Environmental Protection Officer has advised that the approaches detailed in Section 7 of the Environmental Scoping Report are supported. Conditions would be applied to secure suitable measures at the future development to ensure noise/vibration criteria are met.

On specific environmental matters it is encouraged that further liaison takes place with the Council's Environmental Protection Team. The relevant contacts are:

- Air Quality/ Land Contamination: Kate Simons (Senior Environmental Protection Officer) [ksimons@chichester.gov.uk](mailto:ksimons@chichester.gov.uk)
- Noise and Vibration/ Lighting: Paul Thomson (Senior Environmental Protection Officer) [pthomson@chichester.gov.uk](mailto:pthomson@chichester.gov.uk)

### **Water Quality, Flood Risk and Drainage**

The ES should include a full Flood Risk Assessment and proportionate Drainage Strategy.

The Council's Drainage Engineer has identified no specific recommendations for items which need to be scoped into the ES.

Any proposed piling has the potential to mobilise contamination, and therefore if piling is proposed a piling risk assessment is required to demonstrate that risks to controlled waters can be mitigated against, the results of which should be incorporated into the ES.

As a major development, the proposed development would be expected to connect to Mains Sewage. The ES should include consideration of proposals relating to foul drainage.

### **Socio-economics**

The socio economics assessment should provide an impact assessment of a development on relevant social and economic indicators. There is no specific requirement or 'standard' practice guidance for the socio-economic assessment, and assessments typically include consideration of the demographic, economic and housing provision of the local and wider area, along with consideration of social infrastructure, such as healthcare, education and open space. The assessment of potential impacts and likely socio-economic effects provided in Section 14 of the scoping report is accepted.

### **Transport and Access**

Both West Sussex County Council Local Highways Authority (LHA) and National Highways state that any consideration of Transport and Access within the ES should be compatible and consistent with the required Transport Assessment. The Scoping report indicates that this chapter of the ES will be prepared in line with the IEMA Guidelines for the Environmental Assessment of Road Traffic which, together with DMRB Volume 11, is understood to be the current standard guidelines for this topic.

In terms of the scope of the ES, the scoping report proposes that all transport matters with the exception of 'Accidents and Safety on the Local Highway Network' will be considered in the ES. However, WSCC advise that it is unclear why 'Accidents and Safety on the Local Highway Network' is being scoped out of the ES. The development proposals will introduce a new vehicular access onto Stane Street as well as additional trips to the highway network, as such the proposals have the potential to impact upon highway safety. It is therefore recommended that this matter is scoped within the ES.

Whilst West Sussex County Council Public Rights of Way have not commented on the scoping report, the ES should include details of the mitigation measures associated with the planned diversion of PROW 417 within the site in respect of safeguarding and promoting active travel together with details of appropriate safety measures to protect PROW users.

## **Cumulative Effects**

Cumulative effects can be additive or synergistic and can arise in the following ways:

- When a single resource or receptor is affected by more than one development at the same time (inter-project),
- when two or more impacts of the proposed development combine to act on individual receptors or resources (intra-project).

The Council will expect to view and agree the list of other projects and applications to be considered as part of this assessment, and may identify additional projects to include within this assessment if appropriate.

## **Summary**

Careful consideration has been given to the Scoping Report. Careful consideration has also been given to responses received from consultees and the proposed methodology for each Technical Topic Area. **The outcome from this exercise is that the Council agrees with the applicant that the topics identified within the Scoping Report should be included or Scoped into the ES.**

However, there are some gaps within the detail of the proposed topics within the Scoping Report which are detailed within this letter along with particular comments from consultees relating to the proposed scope /extent and assessment methodologies proposed. In addition, the applicant is reminded of the need to take full and proper consideration of the advice set out in each of the consultation responses which are included with this letter.

I hope that this advice will help with the preparation of the Environmental Statement to accompany any future planning application. Please do not hesitate to contact me if any matter requires further clarification.

Yours sincerely,

### **Jeremy Bushell**

Principal Planning Officer  
Development Management - Majors and Business  
Chichester District Council

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Consultation responses have been received from the following organisations and are enclosed

- CDC Environment Strategy Unit
- CDC Coast Protection & Land Drainage
- WSCC Highways
- Environment Agency
- CDC Archaeology
- CDC Environmental Protection
- National Highways
- Southern Water

