

Document number:
CDC/04/Matter 4



Chichester Local Plan Examination statement

Matter 4: The economy

Policies 11/15/16/19/24/26/28/29/32

September 2014

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This statement has been produced as part of the examination of the Chichester Local Plan. It answers the Inspector's questions relating to matter 4.

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1. Is the quantum of employment land set out in Policy 3 informed by and consistent with the most up to date evidence in the Employment Land Review (ELR) update 2012?

- 1.1. Yes, the employment land figures set out in Policy 3 are drawn directly from the Employment Land Review (ELR) Update (CD-12). The policy makes provision to bring forward around 25 hectares additional employment land suitable for Business Class (B1-B8) uses, comprising around 5 hectares of office space and around 20 hectares of industrial/warehousing. This is in addition to existing committed employment land and floorspace, comprising outstanding planning permissions and undeveloped employment allocations carried forward from the 1999 Chichester District Local Plan.
- 1.2. The ELR Update (Chapter 5) presents four alternative assessments of future employment floorspace requirements:
- Labour demand scenario – these are derived from econometric forecasts based on the expected performance of different industrial sectors and are independent of proposed levels of housing;
 - Labour supply scenario - based on projected workforce growth, taking account of housing provision proposed in the Local Plan and projected demographic changes;
 - Policy-ON scenario – assuming the same level of employment growth as the labour supply scenario, but assuming a different sectoral distribution that focuses more strongly on professional services, advanced manufacturing, horticulture and creative design; and
 - Past take-up of employment land – a straight forward projection of net change in employment floorspace over the 2000-08 period.
- 1.3. For each scenario, the gross employment requirements were adjusted to factor in the need to replace potential losses of employment floorspace and to allow for a 'frictional margin' to support choice and competition between sites. The gross floorspace requirements were then adjusted to take account of existing employment commitments (outstanding planning permissions and extant Local Plan allocations). The resulting figures present net employment floorspace requirements for the district (including the National Park).
- 1.4. The study conclusions are presented at paragraphs 5.81-5.89 of the ELR Update. They state that, in addition to existing employment land and floorspace commitments, there is a need for 27 to 35 hectares across Chichester District based on the economic scenarios. The study assumes that around 10-15% of future employment land will be provided within the National Park, equating to between 3 to 6 hectares. On this basis, the study

considers that it would be appropriate to consider provision of between 24 to 29 hectares of employment land in addition to sites with planning consent.

This comprises:

- 5 to 8 hectares of land appropriate for B1a and B1b uses in the south of the Plan area (including Chichester City) – where the upper level is based on the Labour Demand scenario and the lower level on the Policy-ON scenario;
- Up to 21 hectares of land for industrial development (B1c, B2 and B8 uses).

1.5. The figures set out in Local Plan Policy 3 are based on a Policy-ON scenario. They assume that the forecast level of employment growth is linked to labour supply based on planned levels of housing development, but assumes that levels of growth by employment sector are skewed towards higher value sectors to align with the Economic Strategy for Chichester 2013-2019 (CD-36). Based on this scenario, the ELR Update (Figure 5.32) identifies a requirement for around 30 hectares additional employment land for the District (including the National Park), comprising just under 5 hectares for office/R&D (B1a/B1b) uses and just over 25 hectares for industrial/warehousing (B1c/B2/B8) uses.

1.6. Taking account of the conclusions in the ELR Update referred to above, the Plan considers it appropriate that provision is made to accommodate the office/R&D requirement entirely within the Plan area, whereas it is assumed that a proportion of the industrial/warehousing land will be provided within the National Park. For this reason, Policy 3 specifies around 25 hectares of employment land, comprising around 5 hectares of office space and around 20 hectares of industrial/warehousing space.

2. What is the relationship between the quantum of proposed employment development and the quantum of housing that is planned? Does the quantum of employment land take account of the under- allocation of housing? Does the Plan provide for monitoring and adjusting employment development in relation to housing delivery?

2.1. Yes, the provision for housing and employment in the Local Plan are directly linked. The work undertaken for the ELR Update (CD-12) preceded the publication of the Local Plan: Key Policies - Preferred Approach (CD-98) which specified the proposed level of planned housing for the Plan area. However, the employment requirements identified in the ELR Update were directly linked to assumed levels of housing provision in Figure 182 in the Strategic Housing Market Assessment (SHMA) (CD-17a), which assumed delivery of 7,000 homes in the Chichester Local Plan area (the Local Plan figure is 6,973 homes). Both the SHMA and ELR Update were undertaken

by GL Hearn and both use a shared set of projections regarding demographic change and employment forecasts, and incorporate common assumptions regarding in-migration and labour force change. Therefore, the overall provision for employment land in Local Plan Policy 3 directly reflects the level of housing proposed in the Plan.

- 2.2. In terms of monitoring and adjusting employment development, it should be emphasised that the relationship between housing and demand for employment development is not straightforward, but depends on factors such as the impact of demographics on the size of the local labour force, commuting patterns, levels of growth (or decline) in different employment sectors, and the growth in home working. In addition, the level of demand for employment floorspace will be dependent on a range of commercial market factors.
- 2.3. Due to the range of variables, and the fact that businesses requiring B1-B8 floorspace represent a relatively small proportion of the total projected employment growth (only just over 20%), it is not considered that the level of employment land required is likely to be significantly affected by small variations in housing delivery. At present, there appears to be relatively low demand for business space, following the recent economic recession. Development of new Business class floorspace in Chichester District has averaged only 6,200m² (net) per year over the period since 2013. The low demand is also evidenced by the fact that some employment allocations in the 1999 Local Plan remain undeveloped (e.g. at Tangmere and Selsey) and in some locations there is pressure for the conversion/redevelopment of existing employment sites to other uses.
- 2.4. The employment land requirements in Policy 3 are expressed as broad targets (i.e. 'around 25 hectares'), which allows some flexibility to allocate more or less employment land. Further work will be undertaken to allocate employment sites in the Site Allocations DPD.
- 2.5. The NPPF (paragraph 22) states that employment land allocations should be regularly reviewed. Appendix G of the Local Plan sets out a monitoring framework to assess the implementation of the Plan policies, including the provision and take-up of employment land.
3. **Is the Plan internally consistent and does it set out a clear framework for the distribution of employment land (25 ha new employment land across the borough) through Policies 11, 15, 16, 19 (employment land in the east- west corridor) and Policy 24 (employment land on the Manhood Peninsula)?**

- 3.1 Yes, the Plan is internally consistent, but the policies allow some flexibility as to how the 25 hectares new employment land will be met. This reflects the fact that, whilst some employment sites are already allocated in the Plan, others remain to be identified. The Plan makes provision to allocate additional employment sites in future Plan documents, including neighbourhood plans. However, the Council now envisages that the primary vehicle for allocating additional employment sites will be through a Site Allocation DPD.
- 3.2 Policy 3 makes provision to bring forward around 25 hectares additional employment land suitable for Business Class (B1-B8) uses, comprising around 5 hectares of office space and around 20 hectares of industrial/ warehousing space. Following proposed Local Plan main modification **M26**, the amended policy wording clarifies that this land will be additional to existing planning permissions and employment allocations carried forward from the 1999 Local Plan¹. This reflects the calculations undertaken in the ELR Update (CD-12).
- 3.3 As referred to in the supporting text (paragraph 6.5), the Plan allocates new employment land in conjunction with the strategic housing developments at West of Chichester (Policy 15) and Tangmere (Policy 19). However, part of the land included in the Tangmere allocation, and the employment allocation at Shopwyke (Policy 16) have been carried forward from the 1999 Local Plan, so will not contribute to meeting the 25 ha requirement. In total, the allocations at West of Chichester and Tangmere will contribute 9 ha new employment land towards the 25 ha total provision sought in the Plan. The remaining employment provision is yet to be identified.
- 3.4 It is intended that the majority of the Local Plan employment provision is provided in and around Chichester city, where Policy 11 makes provision for up to 15 ha for B1-B8 uses, including up to 5 ha land for B1 Offices. This reflects the overall Plan strategy which focuses the majority of new housing development in the Chichester city area. The ELR Update, also states that the local office market is focused on Chichester. It is envisaged that the remaining employment provision will comprise small scale sites elsewhere, which may include provision of up to 2 ha at East Wittering/Bracklesham (see response to Matter 4/6 below).
- 3.5 The inter-relationships between the Local Plan policies are summarised in the table below.

¹ [Schedule of Proposed Main Modifications to the Pre-submission Local Plan](#): Page 1

Policy	Proposed employment land	Comments
Policy 11 (Chichester City)	Up to 15 ha (B1-B8 uses), of which Up to 5 ha (B1 Office)	Sites include West of Chichester (Policy 15). Remaining sites to be identified in Site Allocations DPD. Sites will contribute to meeting the overall Plan target of 25 ha.
Policy 15 (West of Chichester)	6 ha (B1 uses)	New allocation - will contribute to meeting the overall Plan target of 25 ha and the 15 ha to be provided in Chichester city.
Policy 16 (Shopwyke)	At least 4 ha (B1 and/or B2)	Site carried forward from 1999 Local Plan (and already has planning permission) – therefore will not contribute to the 25 ha Plan target.
Policy 19 (Tangmere)	4.5 ha (B1-B8 and similar employment generating uses)	Approx 1.7 ha carried forward from the 1999 Local Plan, the remaining 2.8 ha will contribute to meeting the 25 ha Plan target.
Policy 24 (East Wittering/Bracklesham)	Subject to investigation of potential sites	No sites currently identified. The Employment Site Viability Assessment concluded that there may be requirement for a 2 ha allocation over the Plan period to address the employment needs of East Wittering and surrounding villages. Any site allocated would contribute to meeting the 25 ha Plan target.

4. How is the requirement for 5 hectares of B1 office space in Policy 3 and paragraph 12.9 translated into the allocation of 6ha of B1 use in Policy 15?

4.1. Policy 3 identifies a requirement for around 5 hectares office space. It is assumed this will comprise Use Classes B1a (Offices), although it may also include an element of B1b (Research and Development). Policy 11 states that up to 5 hectares suitable for B1 Office uses will be brought forward in Chichester city. Policy 15 allocates 6 hectares of employment land (suitable for B1 Business uses). The West of Chichester SDL is considered to offer potential for development of a business park in conjunction with the large scale housing development (subject to provision of suitable road access providing a route for commercial vehicles to the A27). This is considered likely to comprise predominantly B1c (Light industry), but might include

elements of B1a and B1b. Work to determine the most suitable mix of employment uses will be undertaken through the development masterplanning process which is now underway.

5. Policy 11 (paragraphs 12.10/12.11) refers to sites with potential for employment use subject to further investigations. Is it clear how these potential sites, to be allocated through the Site Allocations Local Plan or an Area Action Plan, will relate to the quantum of employment land set out in Policy 3?

5.1 Yes, the sites referred to in paragraphs 5.10 and 5.11 are identified as potential employment sites in the ELR Update (CD-12) and the Employment Site Viability Assessment (CD38a & CD38b). The Council will assess whether these or other candidate sites should be allocated as part of the Site Allocations DPD. If allocated, they will contribute towards meeting the 25 hectares identified in Policy 3.

6. Does the Plan provide clear criteria for employment development in settlement hubs and service villages?

6.1. Yes, the criteria are considered by the Council to be sufficiently clear for employment development in settlement hubs and service villages. For the service villages, Local Plan Policy 2 provides for small scale employment which supports local services to be provided in locations which respect the setting, form and character of the settlement; avoiding actual and perceived coalescence of settlements; and ensuring good accessibility to local services and facilities. Policy 3 provides for a wider range of local employment opportunities in the rural parts of the Plan area and for extensions to existing sites.

6.2. The parishes, through their Neighbourhood Plans, could identify the quantum, type and location of the employment provision dependent on their local needs. Where parishes do not intend preparing Neighbourhood Plans, or do not allocate land for employment, there is potential for employment provision to be identified by the Council in the Site Allocation DPD, working in close liaison with the parishes concerned.

6.3. For the settlement hub of Tangmere, Policy 18 requires provision to be made within the actual Strategic Development Location for the incorporation of small scale business use, which will be identified through the Tangmere Neighbourhood Plan. This is because of the Tangmere SDL's close proximity to the Chichester Business Park, where a larger amount of employment provision is to be made. Policy 19 makes provision for 4.5

hectares of employment land to be allocated for B1-B8 Business use in the form of an extension to the Chichester Business Park to the east of Tangmere village, which has direct access to the A27 via City Fields Way/Meadow Way. The Business Park currently has poor broadband access which the policy seeks to redress.

- 6.4. For the settlement hub of Southbourne, Local Plan paragraph 12.63 states that 300 homes should be provided together with employment land through the Southbourne Neighbourhood Plan. Paragraph 12.65 says that there is good access to employment elsewhere at Chichester city and neighbouring Havant. It acknowledges that opportunities for providing employment in Southbourne are very limited and that the existing industrial estate at Clovelly Road is severely constrained and some units may benefit from refurbishment. The 2009 Chichester Employment Land Review (CD-11) in paragraphs 6.4 and 7.38 concluded that Clovelly Road's potential for continued employment use should be kept under close review and that further investment would be needed to attract occupiers. The Chichester Employment Land Review Update (CD-12) paragraph 6.100, recommended a modest allocation (potentially up to 2ha) as part of a new strategic residential scheme subject to detailed consideration of locational and access issues and market demand at the time of development. However, the Employment Site Viability Assessment (CD-38a) paragraph 19.1.1 concluded that Southbourne, as a commuter settlement does not need to consider an employment allocation. The draft Southbourne Neighbourhood Plan does not include an employment allocation.
- 6.5. For the settlement hub of Selsey, Local Plan paragraph 13.9 states that additional local employment opportunities should be planned in conjunction with new housing. It states that there is existing employment land capacity at Ellis Square. The Employment Land Review Update (CD-12) paragraph 6.88 concluded that the access and environmental quality of the site is good, but attributes the slow development to the relatively weak commercial market locally. It recommended permitting a greater mix of uses on the remainder of the site and paragraph 7.5 recommended reducing the current 2.2 ha to around 1 ha. This site is subject to more detailed proposals in the draft Selsey Neighbourhood Plan.
- 6.6. For the settlement hub at East Wittering/Bracklesham, Local Plan paragraph 13.14 states that additional local employment opportunities should be planned in conjunction with new housing. The requirement to identify employment land is set out in Policy 24. The Employment Land Review Update (CD-12) paragraph 6.99 concluded that commercial demand for further employment space is likely to be restricted to a very local market. However, the study considered that there is potential for modest provision of

small office and workshop units on flexible terms, focused on local businesses. The Employment Site Viability Assessment (CD-38a) paragraph 20.5 concluded that East Wittering does not need to consider an Employment Land Allocation in the short to medium term, but as the population of the villages at East and West Wittering and Bracklesham Bay expand, additional employment within the existing employment area at East Wittering on a 2ha site would be sufficient to deliver any expansion resulting from local demand from the three villages.

7. Is Policy 26 (existing employment sites) justified, clear and consistent with paragraph 22 of the NPPF?

- 7.1. Yes, paragraph 22 of the NPPF doesn't preclude the protection of existing employment sites; rather it states that planning policies should avoid the *long term protection* of sites allocated for employment use *where there is no reasonable prospect of a site being used for that purpose*. It goes on to say that land allocations should be *regularly reviewed*, and where there is *no reasonable prospect* of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable communities.
- 7.2. The supporting text to policy 26, in paragraph 16.4, justifies the protection of retaining suitable employment sites and encourages their refurbishment and upgrading to meet modern business needs on the grounds that opportunities for new employment sites in the plan area are limited. This is backed up by evidence in the Employment Land Review Update (CD-12), paragraph 5.89.
- 7.3. The supporting text to policy 26, in paragraph 16.5 demonstrates that the existing employment sites within the Plan area were assessed in the Chichester Employment Land Review (CD-11). This concluded in paragraph 7.37 that most were fit for purpose and should be protected for employment uses while they still have active employment uses on them. It found in paragraph 7.38 that a small number of employment sites were considered to be unsuitable or weak employment locations due to lack of effective demand or requiring some form of assistance in delivering new business class (B1-B8) uses. It recommended that these sites be kept under close review. A Chichester Employment Land Review Update was undertaken (CD-12). Chapter 6 of this review identified a continuing requirement to increase the overall supply of business floorspace, and recommended that the Local Plan should support investment in existing sites including their redevelopment and refurbishment.

7.4. Local Plan paragraph 16.6 states that the Local Plan seeks to protect existing employment sites where these *continue to remain suitable for business and related employment uses*. This, in the Council's opinion, is consistent with paragraph 22 of the NPPF.

8. Is Policy 28 (edge and out of centre retail sites: Chichester) consistent with paragraphs 24 – 27 of the NPPF?

8.1. Yes, Policy 28 is consistent with paragraphs 24-27 of the National Planning Policy Framework (CD-62). The policy sets out the need for proposals to follow the sequential test set out in paragraph 24 of the NPPF, preference for accessible, well connected sites, and the requirement for an impact assessment on proposals over 2,500m².

8.2. Where the policy expands upon paragraphs 24-27 of the NPPF (i.e. criteria 4, 5 and 6), this is due to local circumstances in the central shopping area in Chichester city centre, as identified in the Retail Study – Update (CD-73). The tight knit and historic urban grain of the city centre, with its conservation area, narrow streets and listed buildings, does not lend itself to meeting the demands of a modern bulky goods retailer where constrained vehicular access for both deliveries and customers would be a real material issue.

8.3. The justification for criterion 5 of Policy 28 is provided in the response to Matter 4/9 below.

8.4. A proposed modification to criterion 1 of Policy 28 was inadvertently omitted from the Schedule of Proposed Main Modifications to the Pre-submission Local Plan (CD-02a). This would amend the criterion to reflect the NPPF, as follows: “The proposal does not **have a significant adversely affect impact on** the vitality and viability of the central shopping area, either as an individual development or cumulatively with similar existing or proposed developments”.

9. Is criterion 5 of Policy 28, restricting the floorspace of retail units to 1000m², justified?

9.1. Criterion 5 of Policy 28 has been informed by work undertaken on behalf of the Council by GVA on retail development at Barnfield Drive, an out of centre site². The requirement for a 1,000m² gross minimum for edge and out of centre retail units provides a sensible way of differentiating edge and out of centre retail development from units in the city centre. The locally

² [GVA Retail Assessment for CDC \(Date Published 05 Aug 2014\)](#)

appropriate threshold is a longstanding policy carried forward from the 1999 Chichester Local Plan³, which considers the scale of proposals relative to Chichester city centre, and the existing viability and vitality of Chichester city centre.

- 9.2. The minimum size restriction limits the potential impact on the smaller retail units which are predominant in the city centre. The retail facilities on out of centre sites should complement, rather than with compete with, those provided within the city centre. This is in line with National Planning Policy Framework (CD-62) Para 26 and the Planning Practice Guidance (CD-72) with regard to the impact of out of centre retail proposals on the vitality and viability of town centres.

10. Should Policy 29 (Retail policy for in Settlement Hubs and Village Centres) set a floorspace limit for retail development?

- 10.1 Policy 29 does not set a floorspace limit for retail development as the policy complies with the advice in paragraph 26 of the National Planning Policy Framework (CD-62) regarding the threshold at which an impact assessment is required. No evidence has been produced to suggest a different approach should be applied in East Wittering and Selsey.

11. Does Policy 32 plan positively for adequate and appropriate horticultural development, both within and outside the Horticultural development Areas?

- 11.1. Yes, Policy 32 of the Local Plan: Key Policies Pre-Submission (CD-01) encourages horticultural development within the Plan area both within and outside Horticultural Development Areas.
- 11.2. Horticultural Development Areas have been used for many years, being originally designated in the 1999 Chichester District Local Plan⁴ (refer to policies RE11 a & b). Policy 32 of the Local Plan: Key Policies Pre-Submission (CD-01) takes these designations forward by designating the HDAs at Tangmere and Runcton for large scale operations, and the HDAs at Sidlesham and Almodington for smaller scale operations.
- 11.3. The role of the HDAs is to promote horticulture, which is an important sector of agriculture, whilst protecting the environment. In effect HDAs provide an exception to policies which restrain development in the countryside for large scale horticultural development. By focussing horticultural development within

³ [Chichester District Local Plan 1999: Policy S4 Out-of-Centre Sites - Chichester](#)

⁴ [Chichester District Local Plan 1999](#)

HDA it protects the countryside and landscape in other areas of the Plan area for example where there are important views into and from Chichester Harbour AONB, and the South Downs National Park thereby focusing development where it has least landscape impact. By locating horticultural development within the HDAs it protects the countryside and landscape particularly on the Manhood Peninsula which attracts visitors to the area. given the importance of tourism to the local economy

- 11.4. It is considered that the policy approach is positively drafted and is in line with the National Planning Policy Framework (CD-62). Specifically paragraph 19 refers to the government being committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth.
- 11.5. Emphasis is given to delivering sustainable development and building a strong competitive economy (paragraph 20 National Planning Policy Framework (CD-62)). While paragraph 21 encourages local planning authorities to “set out a clear economic vision and strategy for their area which positively and proactively encourages economic growth...set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period”. Paragraph 28 supports the sustainable growth and expansion of all types of business and enterprise in rural areas, both through the conversion of existing buildings and well-designed new buildings.
- 11.6. Section 11 of the National Planning Policy Framework (CD-62) also promotes the protection of the natural environment.
- 11.7. The aim of Policy 32 is to balance the need to provide for an existing successful employment sector while ensuring that development which generates significant HGV traffic is in sustainable locations (paragraphs 34, 35 and 37 of the National Planning Policy Framework (CD-62) and at the same time protecting the natural environment and preventing new development from adversely affecting levels of soil, air, water or noise pollution (paragraph 109 of CD-62).
- 11.8. The Policy is divided into 2 parts to reflect development within the HDA and outside. In the first part of the policy criteria 1-6 apply to land as designated HDAs where in principle horticultural development is acceptable.
- 11.9. Criteria 1 and 2 focus on the need to protect nearby occupants, and the countryside in general, from noise, or pollution of soil, water etc. The criteria are considered to be in line paragraph 109 of the NPPF (CD-62) and mitigation should be provided as part of the detail of a planning application.

- 11.10. The HDAs are located on the coastal plain, due to its flat, open character criterion 3 and 6 are concerned with the impact of development, and the possibility of screening development through planting. This is usually considered as part of the application process.
- 11.11. Criteria 4 and 5 both relate to transport and access. As the horticultural industry is a major contributor to transport movements it is important that development is located near the main road network. The focus of the policy is to locate horticultural development in areas where the road network is adequate, as opposed to spreading it throughout the District. The large scale HDAs at Tangmere and Runcton both have good access to the main road network.
- 11.12. In light of comments from the horticultural industry and to make the policy clearer to use the Council has proposed main modification **M113** which amends the policy to read “Adequate vehicular access arrangements exist from the site to the road network to safely accommodate vehicle movements without detriment to highway safety and residential amenity”⁵.
- 11.13. Criteria 7 and 8 relate to water efficiency and drainage which are standard requirements for large scale glasshouse development, given the amount of run off which is produced. Paragraph 103 of the National Planning Policy Framework (CD-62) indicates that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere.
- 11.14. The second part of the policy is in effect a criteria based policy which applies to new horticultural development including extensions to HDAs. It is anticipated that the demand for expansion of horticultural operations in general may well be able to be accommodated within existing HDAs. If not, the Local Plan sets out criteria against which applications can be assessed if this proves to be necessary. For clarification, the criteria in the first part of the policy apply to applications in addition to those in the second.
- 11.15. Criterion 1 requires an applicant to demonstrate why the development cannot be located within an existing HDA. Given the Councils reason for HDAs and the preferred approach of locating development within them as outlined in paragraph 11.3 above, it is not considered unreasonable to require supporting information to be submitted with planning applications as to why there should be an exception to this approach.
- 11.16. Due to the nature of the horticultural industry development requires flat land for glasshouses, as required by criterion 2 and referenced at Paragraph 7.4 of Viability of the Horticulture and Glasshouse Industry in West Sussex (CD-88).

⁵ [Schedule of Proposed Main Modifications to the Pre-submission Local Plan](#): Page 16

- 11.17. In light of comments from the horticultural industry and to make the policy clearer to use the Council has proposed to amend criterion 3 by main modification **M117** which amends the policy to read “Adequate vehicular access arrangements exist from the site to the road network to safely accommodate vehicle movements without detriment to highway safety and residential amenity”⁶.
- 11.18. Criterion 5 requires that essential infrastructure and services are available or can be provided.
- 11.19. Criterion 6 requires the proposal not to be located in open countryside and to ensure that long views across substantially open land are retained. This criterion was added to the policy in light of comments made by the Inspector to the Easton Farm Appeal (Madestein UK Ltd (SI/10/04990)). It was acknowledged that the landscaping to screen the proposed glasshouse development on the Manhood Peninsula may be intrusive; “*The proposed landscaping is bold as advised in the West Sussex Landscape guidelines. The development would be phased so that the landscaping would already be in place in advance of the later phasing of the glasshouse. Due to the huge scale of the building and the extensive area it covers - some 21 hectares - the landscaping required is substantial. For the most part, where trees do currently exist, they puncture the skyline above the hedgerows and are of varying shapes and heights. The substantial on and off-site planting required in this case to screen the proposed building would be far more extensive than the re-establishment of coherent field boundaries. It may well contain differing species creating texture and variations in height within it once matured, but from any distant vantage point it would appear as a tall ‘green’ barrier or ‘curtain’ as it was described at the inquiry. It would appear as an incongruous feature, restricting long distance views from some areas, particularly the longer distance views currently available to the South Downs National Park. In my opinion it would not be part of the creation of a new large scale tree and hedgerow framework which complements the open, intensively farmed landscape. Significant views would not be maintained. It would fail to adequately mitigate the harmful impact of the development on the character and appearance of the surrounding area.*” (paragraph 45 - Appeal Decision APP/L3815/A/11/2160759⁷)
- 11.20. The Plan is positive in its approach to provide for adequate and appropriate horticultural development, balancing the need to assist the horticultural sector while balancing the need to protect the environment and local residents.

⁶ [Schedule of Proposed Main Modifications to the Pre-submission Local Plan](#): Page 17

⁷ [Appeal Decision APP/L3815/A/11/2160759](#)

12. Does the Plan provide adequate support for horticulture development and allow for appropriate account to be taken of viability?

- 12.1. Yes, the Plan supports the horticultural industry, which is a significant part of the West Sussex economy, with particular concentrations south of the A27 in the Chichester and Arun District Council areas.
- 12.2. Locally the glasshouse sector alone has a reported production turnover of £120 million and a retail value of around £500 million, as well as wider economic contributions through its supply chain of ancillary business. The local area (Chichester and Arun) employs more than 1,300 fulltime equivalent staff and additional seasonal workers (Viability of the Horticultural and Glasshouse Industry in West Sussex (CD-88)).
- 12.3. The designation of HDAs has worked well over the years and enabled a number of large-scale enterprises to locate and/or expand in the District but also protected the landscape in other areas. However it is acknowledged that there a number of issues identified by the horticultural industry with the approach of identifying HDAs, for example, land ownership and size of the HDAs.
- 12.4. In the past 20 years there have been changes to the horticultural industry that have led to it being increasingly hard for smaller suppliers to survive. There is an emphasis on larger units that achieve a better economy of scale, enabling new technology to be used and more efficient working practices. However, there is also a need to provide a range of sites as some horticultural businesses remain small scale niche for example for the production of herbs or other specialist produce. This applies in particular to development at Sidlesham and Almodington HDA due to the relatively small size and large number of holdings. Policy 32 of the Local Plan: Key Policies Pre-Submission (CD-01) recognises this and makes the distinction that horticultural development at Sidlesham and Almodington HDAs will be the focus for smaller horticultural development, while larger development will be focused at Runcton and Tangmere.
- 12.5. There are currently 2 applications for glasshouse development at the Runcton HDA which are yet to be determined.
- 12.6. It should also be noted that Tangmere has capacity for more glasshouse development. However the landowner perceives that there is a certain amount of 'hope value' attached to this land. This has led to a reluctance to release it for glasshouse use. The Council is currently investigating the process for possible compulsory purchase of land within the HDA if its release cannot be secured through negotiation. Paragraph 16.38 of Local Plan: Key Policies Pre-Submission (CD-01) refers to "It is acknowledged that

additional land may be required by the horticultural industry to expand further through the plan period. The preferred approach for horticultural development is for land within existing HDAs to be used first and if not possible, land adjacent to an HDA. Where it can be demonstrated that development within HDAs is hindered, particularly at Runcton and Tangmere, the Council will where appropriate use its compulsory purchase powers to ensure that the expansion of the horticultural and associated industry is not frustrated”.