

Position Statement on behalf of The Goodwood Estate Company Limited

MATTER 5: Employment Land  
Policy SD35

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It is the position of the Goodwood Estate that the response of the local planning authority to concerns raised in representations to the local plan is unacceptable. Neither the proposed modifications nor the reasoning offered through the Summary of Issues and responses offers the Estate with any comfort or certainty that the concerns raised have been considered and adjusted appropriately.

The concerns raised in the representation relating to the identification of employment opportunities and business growth and diversification in the face of a constantly changing market place, remain. The objective of development restriction to protect attractive landscape is easily stated but the local plan lacks any detail response to how it will deliver that aim if the economics of the area that have given rise to and sustain the national park are subject to uncertainty.

The broad-brush approach to policy application is acceptable at a strategic level if supported by local, detail policy. The latter is absent and for this reason the plan lacks clarity, precision and balance and consequently it provides uncertainty to developers, landowners, businesses and communities with the National Park.

Matter 5 :

Are the numerical provisions of Policy SD35 for a total of 10.3 hectares of new employment land adequate and supported by robust evidence?

The plan focusses on employment land allocation but fails to properly recognise the importance of other economic drivers that contribute to employment provision. These may not place great demand on land resources but are equally, if not more, important. There are many businesses within the national park that contribute to its success and sustainability; these must be allowed to enhance, expand and diversify their operation. Policies in the plan should recognise and make provision for development that allows existing businesses to grow and diversify, including new development. Employment / business development should not be restricted to employment sites but should recognise the importance of locational needs for business sustainability.

The plan should appropriately define commercial activity (and the interrelationship of business and employment) in so far as it contributes to national park sustainability, and not to concentrate solely on "employment."

The plan should promote the evolution of landed estates as major businesses within the park that generate funds for reinvesting in the National Park's sustainability. Such businesses involve a range of employment and commercial activities that do not fall immediately under the consciousness of "employment"; this must be clarified. Policies should contain sufficient flexibility to enable estates to plan and undertake appropriate developments with confidence, and recognise that a divergence from policy may be acceptable where wider benefits to the National Park arise.

Whole Estate Plans could address this concern. However, the planning role of Whole Estate Plans should be given weight through the local plan and should form part of the development plan. The authority's insistence these are kept outside of the development plan, yet are increasingly being used to determine the appropriateness of development proposals and given weight in planning decisions, is unacceptable. Such plans if given appropriate weight and standing in planning terms will provide confidence to estates to invest. Despite what is suggested by the authority in responses, at present through the development plan there is no certainty that proposal pursuant to a Whole Estate Plan will be supported at application. The provision of new housing for example, whether to house staff, provide for local needs or generate much needed income for reinvestment, is precluded by emerging policies and a lower than required housing land supply. The plan does not provide certainty that development, even if in an estate plan, will be permitted.

The Estate is proceeding with a Whole Estate Plan but the proposed main modifications do nothing to increase the Estate's confidence in how Whole Estate Plans will be used, their purpose, need and planning weight.

The form of employment is changing considerably with moves in technology and consumer choice. The reliance on traditional employment sites is therefore diminishing but is not being balanced in the plan by a recognition of other forms and suitable locations for future employment trends. The reference "*No additional land needs to be permitted*"

*or allocated to meet employment need in the National Park*<sup>1</sup> is erroneous. The plan should state that no additional land for “traditional forms of employment” is required but provision will be made for appropriate start-ups or extension or diversification of other employment forms on a site by site (locational) basis where these can be undertaken without harm to national park objectives. In many cases this may be outside of defined settlement boundaries and the authority is urged not to apply an inflexible position in respect of such opportunities that could not have been anticipated.

The proposed main modifications do nothing to increase the Estate’s confidence that much needed employment and growth to sustain the national park will arise. Appropriate provision for expected changes in employment and diversification are not addressed positively through emerging planning policy.

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<sup>1</sup> Page 168 Summary of Issues and Responses (second response)