**Chichester Local Plan 2021 - 2039**

**Horticultural Development Areas**

**Background Paper**

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# **Introduction**

* 1. This paper sets out the planning policy approach for providing for horticultural development within the Local Plan area for the period up to 2039. The policy approach has been incorporated into the strategic and development management horticultural development policies E3 Addressing Horticultural Needs and E4 Horticultural Development in the new Local Plan.
  2. The designation of Horticultural Development Areas (HDAs) originated in the 1999 Chichester District Local Plan. The role of the HDAs is to promote horticulture and support the growth of such a specialised sector of the economy especially in the southern part of the plan area, whilst ensuring that development takes place in a way that protects the environment. Through land allocation, HDAs have effectively provided an exception to policies which might otherwise constrain development in the countryside for extensive horticultural development.
  3. The designation of HDAs has worked well over the years and enabled several largescale enterprises to locate and/or expand in the southern part of the plan area. Whilst there is an emphasis on larger units that achieve a better economy of scale, facilitate new technology and enable more efficient working practices, there is still a need to provide a broad range of sites to support the smaller niche businesses. This background paper details the predicted horticultural need for the new Local Plan period and explains how this need will be met and managed through policy.
  4. The background papers and related evidence are available on the council website at [www.chichester.gov.uk/localplanexaminationlibrary](https://www.chichester.gov.uk/localplanexaminationlibrary). This background paper may be reviewed and updates issued during the examination of the Local Plan.

# **Background**

* 1. There are four designated HDAs within the plan area located at Tangmere, Runcton, Sidlesham and Almodington. Tangmere and Runcton HDAs are reserved mainly for large-scale horticultural development whilst Sidlesham and Almodington HDAs house smaller-scale niche horticultural development.
  2. The large-scale horticultural development at the Tangmere and Runcton HDAs incorporates businesses supplying large supermarkets, garden centres and food chains. These areas include stand-alone packhouses and extensive areas of glass for salad production. In contrast, the smaller-scale horticultural development located within the Sidlesham and Almodington HDAs comprises a patchwork nature of landholdings, historically allocated by the Land Settlement Association in the 1930s. The location and distribution of development at Sidlesham and Almodington HDAs makes land assembly and expansion difficult and has therefore proven more suitable for the existing market gardening businesses and nurseries that support the local area, as well as the small sites that supply produce for wider distribution.

# **National Policy Context**

* 1. The National Planning Policy Framework (NPPF) was updated on 19 December 2023, however, under paragraph 230, plans that have reached Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage on or before the 19 March 2024 will be examined under the relevant previous section of the Framework. All references to the NPPF are related to the 2021 version which should be used as the basis for the examination of the plan.
  2. The NPPF (2021) aims to achieve sustainable development through ensuring that sufficient land of the right types is available in the right places and at the right time, as well as making effective use of land to support growth, innovation and improved productivity (paragraph 8). Planning policies and decisions are required to promote an effective use of land whilst safeguarding and improving the environment (paragraph 119).
  3. The NPPF expects planning policies to help create the conditions in which businesses can invest, expand and adapt. The policy approach taken should allow each area to build on its strengths (paragraph 81) and recognise and address the specific locational requirements of different sectors (paragraph 83). In relation to rural areas, the NPPF specifies that planning policies and decisions should enable the sustainable growth and expansion of all types of business including the development and diversification of agricultural and other land-based rural businesses (paragraph 84).
  4. The Planning Practice Guidance Housing and Economic Development Needs Assessment (2020) (PPG) provides that it is important to understand whether there are specific requirements in the local market which affect the types of land or premises needed. Clustering of certain industries can play an important role in supporting collaboration, innovation, productivity and sustainability as well as in driving the economic prospects of the areas in which they locate (paragraph 032).

# **Local Policy Context**

**Chichester Local Plan: Key Policies 2014-2029**

* 1. The Plan’s pre-text to Policy 32 Horticultural Development refers to the Council’s intention for land within the existing designated HDAs to remain available for horticultural development including growing, packing and other processes directly related to the preparation of fruit, vegetable and salad products. It is also recognised that additional land may be required by the horticultural industry and where it is not possible for land within HDAs to be utilised, then land adjacent to HDAs may be considered. Applicants must, however, provide reasons which may need to be substantiated with evidence explaining why the new development cannot be located within the HDA.
  2. Policy 32 is divided into two sections with the first section applying to horticultural development within HDAs and the second section providing additional criteria to be met where the horticultural development is sought on land outside HDAs.

**Regulation 18 Chichester Local Plan Review 2035 Preferred Approach Consultation**

* 1. The strategic horticultural development policy (S11) outlined the future need for horticultural land based upon the Housing and Economic Development Needs Assessment (HEDNA) report produced in August 2018. The report used data based on past glasshouse floorspace permissions to produce a trend-based forecast and provide recommendations for growth in the horticultural industry. The development management policy for horticultural development (DM15) remained largely unchanged from the Chichester Local Plan: Key Policies 2014-2029 Policy 32.
  2. Representations received in relation to the horticultural policies acknowledged that the horticultural industry was now wider than just glasshouse development and included ancillary horticultural development as essential to support the industry. Interest was expressed for the continuing development of innovative horticulture at the smaller HDAs at Sidlesham and Almodington whilst the potential of future development at Tangmere HDA was questioned given the current/potential housing nearby. To encourage growth of the industry, development outside of the HDAs was supported whilst a specific proposal was made by a major horticultural operator to extend the current Runcton HDA by approximately 30 hectares. Remaining key issues that were raised concerned impacts upon landscape, water, light and tourism/recreation from future development.

# **Evidence Base – Determining Future Horticultural Need**

* 1. As referred to at 4.2 above, the Council had commissioned GL Hearn to prepare the HEDNA to form part of the evidence base for the Local Plan and guide the preparation of planning policy. The 2018 HEDNA (H08) informed the Preferred Approach version of the Local Plan. Based on the HEDNA’s conclusions, the strategic horticultural policy had resolved that the need identified at that time (forecast solely from past glasshouse permissions data within Tangmere and Runcton HDAs), could be accommodated through existing permissions and undeveloped floorspace within the HDAs. The consultation response did, however, highlight the increasing scale of the industry outside of the current HDAs as well as the extent of present-day ancillary horticultural development deemed necessary for largescale horticultural operations. As a result of the consultation response, further work was carried out on the evidence base.
  2. New data was sourced from the Council’s database comprising historical planning permissions for all forms of horticultural development across the entire Local Plan area. This data once collated and categorised revealed past trends in horticultural development for the past 25 years. This information was used to inform the September 2020 update of the Housing and Economic Development Needs Assessment (HEDNA) (H07).
  3. Using the permissions data, annual totals for the horticultural development types permitted both inside and outside of the HDAs were projected forward to the end of the Local Plan period which at that time, was 2037. Sample data suggested that only around 80% of permissions were actually implemented so the projections were discounted on this basis. Acknowledging that there were a number of uncertainties about the extent of growth of the industry, including its future after Brexit, the HEDNA 2020 (H07) indicated that if trends were to continue, some 200 hectares of horticultural land could be required over the Local Plan period to meet horticultural development need.
  4. The data confirmed that whilst mostly glasshouse development had traditionally taken place within HDAs, a large amount of development comprising other forms of horticultural related activity such as polytunnels had taken place in and outside of the HDAs. The data recognised a growth in storage, distribution and packhouse facilities within HDAs which the HEDNA considered was essential for world-class horticultural enterprises based within HDAs to operate effectively. The HEDNA data has subsequently been updated to inform the revised Local Plan period of 2021-2039 and is summarised in the table below at 5.5.
  5. Horticultural Permissions 1993/4-2020/21 data (Floorspace reported in Ha)

|  |  | In HDA | Out HDA | Total\* |
| --- | --- | --- | --- | --- |
| Glasshouse net | Annual | 1.9 | 0.2 | 2.1 |
|  | Total | 54.1 | 4.6 | 58.7 |
| Glasshouse inc replacement | Annual | 3.1 | 0.2 | 3.3 |
|  | Total | 89.3 | 6.8 | 96.1 |
| Polytunnel / greenhouse | Annual | 0.4 | 4.6 | 5.0 |
|  | Total | 10.3 | 132 | 142.3 |
| Water storage | Annual | 0.1 | 1.5 | 1.6 |
|  | Total | 4.0 | 42.7 | 46.7 |
| Storage, distribution or packhouse | Annual | 0.4 | 0.1 | 0.5 |
|  | Total | 9.9 | 2.7 | 12.9 |
| Other | Annual | 0.2 | 0.5 | 0.7 |
|  | Total | 5.1 | 15.5 | 23.4 |
| Total Net | Annual | 2.9 | 6.8 | 9.7 |
|  | Total | 83.4 | 197.6 | 283.9 |
| Total inc replacement | Annual | 4.1 | 7.0 | 11.3 |
|  | Total | 119.8 | 202.9 | 325.6 |

*\* includes figures where in/out HDA data not provided/rounding also responsible for differences between Total column and other columns. Table’s original source: GL Hearn based on Chichester District Council data.*

* 1. Overall plot requirements for the period up to 2039 are provided in the table at 5.7. These are based on an estimate that horticultural floorspace only takes up between 50-62% of land areas, with the remainder used for landscaping, car parking etc. Using these plot ratio assumptions, around 204 hectares of horticulture development land may be needed to avoid constraining growth in the horticultural industry, comprising some 67 hectares of land within HDAs and 137 hectares of land outside of HDAs. These land requirements are reflected in the new Local Plan’s Policy E3 Addressing Horticultural Needs. If this requirement was delivered in the same proportions as previous trends, it would equate to 39 hectares of floorspace needed within HDAs and a further 70 hectares of floorspace outside of HDAs over the Local Plan period. The predicted future horticultural need assumes that historic rates and types of horticultural development inside and outside of HDAs continue at the same level. The need requirement includes an element of floorspace requirements for storage, distribution and packhouses of which around 7.2 ha is considered to overlap with general B8 needs.
  2. Future Horticultural Floorspace and Plot (Land) Needs 2021-39 (ha)

|  | Plot ratio | Floorspace  (HDA) | Plot (HDA) | Floorspace  (Non HDA) | Plot (Non HDA) | Total Plot (sum) |
| --- | --- | --- | --- | --- | --- | --- |
| Glasshouse net | 0.62 | 27.4 | 44.2 | 2.9 | 4.7 | 48.9 |
| Polytunnel / greenhouse | 0.51 | 5.8 | 11.4 | 66.2 | 129.8 | 141.2 |
| Storage, distribution or packhouse | 0.50 | 5.8 | 11.6 | 1.4 | 2.8 | 14.4\* |
| Total |  | 39 | **67.2** | 70.5 | **137.3** | **204.5** |

*\* Around 50% or 7.2 ha is considered to be double counted with general B8 needs. Table’s original source: GL Hearn based on Chichester District Council data.*

* 1. In order to ensure sufficient land was available to meet the forecast need and in line with the recommendations at paragraph 12.53 of the HEDNA 2020 (H07), the next stage required an assessment to be carried out of land availability both inside and outside the HDAs.

# **Land availability to meet forecast horticultural development need outside of HDAs**

* 1. As shown in Table 5.7, as a result of the HEDNA trend-based forecast, around 70 ha floorspace/137 ha plot area was identified as necessary to support the predicted growth outside of HDAs over the plan period.
  2. A desktop assessment of the large-scale horticultural development outside of the HDAs using the Council’s Geographical Information System (GIS) during Autumn 2020 revealed that this was predominantly confined to the Oving region around the existing sites of Groves Farm and Colworth Manor Farm, as well as Park Farm in Selsey. Groves Farm and Colworth Manor Farm comprise extensive polytunnel coverage with associated reservoirs and temporary worker accommodation. Groves Farm’s land holding extends into the neighbouring Arun District whilst Park Farm in Selsey grows and packs salad produce and has links to the Chichester Food Park businesses on the Runcton HDA.
  3. The desktop assessment revision in 2024 still reveals open agricultural land in excess of 300 hectares between and surrounding the two farms at Oving that could prove suitable for further expansion and potentially, could help meet the predicted future horticultural development need outside of the HDAs.

# **Land availability to meet forecast horticultural development need within HDAs**

* 1. Desktop assessments have also shown that Sidlesham and Almodington HDAs continue to have small areas of land free of planning consents that could potentially support the future small scale niche horticultural development typical of these HDAs.
  2. In relation to the position on land availability in the larger Tangmere and Runcton HDAs, the desktop assessment revealed that land free from planning consents at Runcton HDA comprised of four areas of undeveloped land: a larger land parcel at the eastern boundary measuring approximately 6 hectares and three very small central pockets of land. Whilst the smaller pieces of available land were isolated and unlikely on their own to prove sufficient to accommodate future largescale horticultural activity, the larger parcel of land was more likely to show promise for future horticultural development. The Council’s GIS mapping data continues to show the identified parcels of land as free of development planning consents.
  3. At Tangmere HDA, less than half of the HDA has been developed for horticulture, although the extent to which land at Tangmere HDA was realistically available for horticulture development had been identified as an issue for some time and acknowledged in the HEDNA. Nevertheless, whilst there appeared to be evidence of some delivery/availability issues at Tangmere, consent was obtained for a largescale horticultural development proposal in the last quarter of 2021.
  4. The table below which appears in the pre-text to policy E3 of the new Local Plan is a summary of the assessment of land available within the two larger HDAs that could help to meet the forecast horticultural land requirement within HDAs:

|  |  |  |  |
| --- | --- | --- | --- |
| Horticultural Land Requirement | Identified Land Need within HDAs (HEDNA 2020) |  | 67 ha |
| Horticultural Land Available | Tangmere HDA land free of permissions | 38 ha |  |
|  | Runcton HDA land showing free of permissions | 9 ha |  |
|  | Total land free from planning permissions within Tangmere and Runcton HDAs |  | 47 ha |
| Shortfall in HDA Horticultural Land | HDA land still required |  | 20 ha |

# **Assessment of land outside of HDAs to form potential extension to a current HDA**

* 1. Based on the forecast horticultural development need and a shortfall of 20 hectares of land within HDAs being identified, in line with the recommendation within the HEDNA 2020 (H07) to allocate additional land if necessary, the HDAs were also assessed during Autumn 2020 for their potential for expansion to accommodate the forecast need. The assessment involved an initial desktop analysis using the Council’s GIS mapping of the land surrounding the HDAs at the northern, eastern, southern and western boundaries. The assessment considered the following:

Topography;

Location;

Size of land parcel;

whether land had been promoted for horticultural development or other

forms of development;

land ownership;

* + - Agricultural Land Classification;
    - planning application history;

landscape study findings;

environmental and planning constraints including flood zones; climate

change layers; strategic wildlife corridors; tree preservation areas;

important habitats; listed buildings; access; and adjacent development;

access to infrastructure; impact on neighbouring amenity; and land

quality.

* 1. The assessment findings were used to determine suitability of land for potential largescale horticultural development which have a range of requirements. For instance, large glasshouses and packhouses require direct and suitable HGV access and are typically bulkier structures. They should therefore be clustered close to existing areas bearing this type of development as well as be located near to the main A-class roads. Some operations are required to run on a 24-hour basis and would therefore be best suited to an area where the character of the landscape is associated with built development. In contrast, polytunnels are lightweight structures, temporary in appearance and smaller in scale, growing crops (typically berries) directly in the ground. Crops are packed but not processed on site (washed, shredded etc) and since they usually have a shorter shelf life, are quickly distributed. Crops are seasonal, although the use of polytunnels extends the growing season. Polytunnels are much closer to the base agricultural use of the land, therefore in principle are suitable for more rural areas, provided they have good road links.

***Sidlesham and Almodington HDAs***

* 1. Desktop analysis of the Sidlesham HDA revealed that expansion at this HDA would be particularly difficult, not least based on the fact that a Flood Zone 3 lies at its southern, eastern and western boundaries. The existing distribution of development to the north of the HDA acts to prevent an extension to the northern boundary. However, current development at the northern boundary does include nurseries with polytunnel development and the proposed policy approach for development outside of HDAs could continue to support horticultural development such as this, being permitted adjacent to the HDA.
  2. Historic data produced by CDC on horticultural development within the Sidlesham and Almodington HDAs highlighted that whilst small scale horticultural development has continued, this has also been accompanied by a number of change-of-use applications for residential development on sites within these HDAs.
  3. The desktop assessment showed that Almodington HDA is surrounded by a large amount of undeveloped agricultural land. Some of this land has been promoted for horticultural development in the Regulation 19 consultation response along the western boundary and more details are provided below. However, the location of this promoted land and both HDAs generally, is a considerable distance away from the main trunk roads and as such, would be more appropriate for the smaller scale food growing, already typical of the Sidlesham and Almodington HDAs. Policy E3 in the new Local Plan therefore reflects the intention for these smaller HDAs, to continue to be the focus for smaller scale horticultural glasshouses.

***Tangmere HDA***

* 1. The desktop assessment of the Tangmere HDA revealed some potential limitations on expansion at the Tangmere HDA. A composting facility located to the south-east of the HDA and sewage works to the north posed a conceivable problem for the suitability of adjacent land for the growing of food crops. In addition, access for HGVs particularly in the south to land surrounding the HDA appeared problematic, whilst land around the HDA to the west was close to substantial existing and allocated housing development. Moreover, none of the land surrounding the Tangmere HDA had been promoted for horticultural development. On the basis that current land within Tangmere HDA remaining free from planning permission amounted to 38 hectares, it seemed unnecessary to continue to look at extending this HDA for development.

***Runcton HDA***

* 1. The desktop assessment of undeveloped land at Runcton revealed that land running alongside the eastern boundary of the HDA was near to a composting facility which could impact its suitability for horticultural development. A proposed Strategic Wildlife Corridor also passes to the east of the HDA together with Flood Zones 2 and 3 crossing a proportion of the undeveloped land and there are small clusters of housing to the east aligning the potential access road.
  2. Land to the west of the HDA comprises small parcels of land together with a farm holding marked by intermittent woodland and watercress beds. The Vinnetrow and Runcton Lakes appear at the western boundary of the land parcels. Housing is situated to the south-west within the settlement of Runcton. Whilst access is already in place, environmental constraints presented by Chichester Gravel Pits and Leythorne Meadow SNCI together with the small size of these undeveloped land parcels and location near to Runcton settlement indicates that the area is unlikely to show promise for largescale horticultural development.
  3. Land at the northern boundary of the HDA has been partly permitted for horticultural use with several parcels of land used for largescale polytunnel development including a reservoir. However, enquiries made regarding the undeveloped land’s availability in this area for future horticultural development revealed that the landowners are unwilling to consent to a formal allocation of the land for horticultural development and inclusion within the Runcton HDA.
  4. In contrast to the Tangmere HDA, land had been formally promoted for future horticultural development as an extension to the existing Runcton HDA at its southern boundary. This land was proposed for horticultural development in the Regulation 18 consultation response by the landowners, and subsequently by a large horticultural organisation. The land area totalled approximately 30 hectares. Growers now typically ask for land parcels in excess of and in multiples of 10 hectares, and whilst the land does have constraints as detailed below, the promoted Grade 1 agricultural land could provide a substantial area of potentially suitable “growing land”.

# **Promoted Extension to Runcton HDA**

* 1. The promoted site on the southern boundary of Runcton HDA comprises of two fields, characterised as low-lying flat open landscape separated by a minor road between the fields. A gas pipeline runs north to south under the road between the two parcels of land. The first field to the west measures approximately 21.2 hectares whilst the second smaller eastern field measures approximately 9.7 hectares.
  2. The promoted land is bounded at the west by Saltham Lane and Tree Preservation Order Areas whilst the eastern boundary of the promoted land aligns with the Chichester District boundary. The latest SFRA (May 2023) (CC06) reveals that Flood Zones 2 and 3 and climate change tidal areas cover the eastern, western and northern boundaries. Pagham Rife runs parallel just outside the western boundary and a grade II listed building (Severels) is located within the Runcton conservation area north-west of the site. To the south-eastern boundary of the site, ancient woodland adjoins the site together with a few scattered dwellings. Directly north of the promoted site at the HDA boundary are situated a cluster of horticultural businesses – Hill Brothers Plants, Langmead Polytunnels, Manor Nursery as well as some smaller B1/B8 uses, all of which front onto and connect to the B2166. The B2166 joins the A27 in the west at the Whyke Road roundabout whilst Marsh Lane, accessed from the B2166, links with the roads within Runcton HDA that lead to the A259 at the Chichester Food Park roundabout, to the north of the HDA.
  3. The larger of the promoted fields which forms the western section of the site has already been subject to a landscape assessment in the Council’s evidence base “Landscape Capacity Study (2019) (CC01.02)”. The field forms part of sub-area 133: Runcton Eastern Coastal Plain in the Study and the area is identified as having a low landscape value with a high wider landscape sensitivity. The area has an overall landscape character sensitivity rating of “medium to low”. The landscape capacity for development is considered medium/high, influenced by the B2166 and glasshouses to the north. The study recommends that development is accommodated around existing clusters of built form and informed by further landscape and visual impact assessment whilst being sensitively integrated into the landscape.
  4. A strategic wildlife corridor extends from the eastern boundary encompassing most of the smaller parcel of land. The land promoters have already carried out preliminary ecological surveys to deal with potential impacts of horticultural development within the extension site. The findings were considered by the Council’s Environmental Management Team and they suggested suitable mitigation measures to accompany any future development proposals.
  5. Given that access to the promoted site could potentially utilise existing routes and subject to the environmental constraints being overcome and/or mitigated, horticultural development within the promoted parcel of land whether glasshouse, polytunnel or ancillary development such as packhouses, would not be out of character with the existing horticultural premises to the north of the promoted land and beyond. Policy E3 Addressing Horticultural Needs in the new Local Plan accordingly provided for the land to be incorporated as an extension to the Runcton HDA and was shown on map E3A on the Schedule of proposed changes to the Policies Map that accompanied the Regulation 19 consultation.

# **Summary of current policy approach – Post Regulation 19**

* 1. The extension to Runcton HDA would enable existing largescale operations to expand within the HDA and meet the shortfall in the need identified, as a result of the HEDNA predictions. Whilst it is evident from the HEDNA forecast horticultural growth, that there is still a need for horticultural development to occur outside of HDAs (often due to existing farmsteads expanding operations on their own land), by ensuring land availability within HDAs through the extension at Runcton, horticultural activity can continue to be concentrated in this established area. This approach would continue to follow the aims of Horticultural Policy 32 in the current adopted Chichester Local Plan: Key Policies 2014-2029, namely that land should be utilised within the HDAs first and then where possible, on areas of land adjacent to the HDAs. This practice would also accord with national policy, namely, that it makes effective use of land to support growth, innovation and improved productivity (paragraph 8 of the NPPF) and supports the specific locational requirement of the specialised horticultural sector (paragraph 83 of the NPPF).

* 1. Whilst the Regulation 19 Policy E3 addresses the horticultural development need over the plan period by incorporating an extension at Runcton, in light of the concerns received from environmental organisations in the Regulation 19 consultation responses regarding the protection of the strategic wildlife corridor which encompassed the eastern field of the proposed HDA extension, it is proposed that the eastern parcel of land is removed from the HDA extension. The revised HDA extension would however, still meet the shortfall identified in Policy E3 by providing a further 21 hectares of land within the Runcton HDA as can be seen on the map at Appendix 1. In addition, in response to the Regulation 19 consultation, an organisation with significant landholdings within the local plan area has promoted several parcels of land for horticultural development. The sites which are located in South Mundham; Sidlesham; Almodington; Birdham and at Groves Farm could assist with meeting the future land need requirement for horticultural development outside of the HDAs.
  2. Policy E4 Horticultural Development in the Regulation 19 Local Plan sets out the detailed development management considerations for determining planning applications for horticultural development. The set of criteria had been expanded in response to feedback in the Regulation 18 consultation to recognise the importance of ancillary development and to include additional environmental considerations. To further address the response received from a major horticultural enterprise in the Runcton HDA in the Regulation 19 consultation, additional changes are also proposed. The consultation response had sought a re-classification of “ancillary” horticultural development to “functionally-linked” horticultural development as well as a comprehensive definition of “functionally-linked” development, to strengthen the possibility for growth of current horticultural businesses within the HDAs.
  3. The additional changes proposed to Policies E3 and E4 of the new Local Plan are designed to further reflect national policy’s aims to facilitate the sustainable growth and expansion of agricultural and rural businesses (paragraph 84 of the NPPF) and recognise the importance of clustering the horticultural industry to support collaboration, innovation, productivity and sustainability (paragraph 032 PPG). The changes are also intended to ensure that the range of horticultural and related development identified in the Council’s HEDNA as necessary to the success of the world-class horticultural industry currently within the Local Plan area, continue to be supported within the new Local Plan.

# **Appendix 1: Map E3a – Policy E3 Addressing Horticultural Needs – extension and deletions to Runcton Horticultural Development Area**

