



6 New Bridge Street  
London EC4V 6AB



## PLANNING STATEMENT

OLDLANDS FARM, NEWLANDS ROAD,  
BOGNOR REGIS PO22 9FJ

June 2021  
Ref: 15160a



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| Revision               | Description | Originated | Checked | Reviewed | Authorised | Date      |
|------------------------|-------------|------------|---------|----------|------------|-----------|
| R1                     | DRAFT       | CM         | AC      | AC       |            |           |
| R2                     | DRAFT       | CM         | AC      | AC       |            |           |
| R3                     | FINAL       | CM         | AC      | AC       | SP         | June 2021 |
| DWD Job Number: 15160A |             |            |         |          |            |           |



## 1.0 INTRODUCTION

1.1 This Planning Statement has been prepared on behalf of Lysander and Hanbury Properties Limited ('the Applicant') in support of an application for full planning permission at the proposed development at Oldlands Farm off Newlands Road in Bognor Regis (the 'Site').

1.2 The application relates to the development of a warehouse to be used as a last mile delivery facility, together with associated vehicle parking, van storage, plant, ancillary structures, lighting landscaping and infrastructure works. The full description of development is:

*"Erection of a warehouse (Use Class B8) with ancillary office, associated vehicle parking, van storage, plant, ancillary structures, lighting, landscaping and infrastructure works including earthworks to facilitate flood compensation area"*

1.3 The proposed development incorporates an area of land to the north of the A259 which is to be redeveloped to provide a flood compensation area.

1.4 This Planning Statement describes the proposed development and assesses the development against the Development Plan. This statement will also outline the material benefits of the proposal.

1.5 The application is supported by the following technical reports that should be read in conjunction with this Planning Statement:

- Design and Access Statement prepared by Ashton Smith Architects;
- Biodiversity Survey and Report prepared by Delta Simons;
- Flood Risk Assessment prepared by Delta Simons;
- Surface Water Drainage Statement prepared by Eireng;
- Land Contamination Assessment prepared by Delta Simons;
- Archaeological Desk Bases Assessment prepared by RPS Group;
- Tree Survey and Arboricultural Report prepared by Delta Simons;
- Noise Impact Assessment prepared by TetraTech;
- Air Quality Assessment prepared by TetraTech;
- Transport Assessment and Travel Plan prepared by Vectos;
- Energy and Sustainability Statement prepared by Kelly Taylor Associates;



- Lighting Assessment prepared by Kelly Taylor Associates;
- Landscape and Visual Impact Assessment prepared by Delta Simons;
- Landscaping Strategy (drawing no. 05-991-300 Rev A) and Landscape Planting Plan (drawing no. 05-991-701) prepared by Delta Simons; and
- Construction Management Plan prepared by ISG.

1.6 In addition, the following drawings have been submitted with the application to illustrate the proposed scheme.

**Table 1.1 – Application Drawings**

| DRAWING TITLE                                | DRAWING REFERENCE                                 |
|----------------------------------------------|---------------------------------------------------|
| Site Location Plan                           | 21023 - ASA - V0 - XX - DR - A - PL01 - (S2 – P4) |
| Existing Site Plan                           | 21023 - ASA - V0 - XX - DR - A - PL02 - (S2 - P1) |
| Existing Site Plan - Flood Compensation Area | 21023 - ASA - V0 - XX - DR - A - PL19 - (S2 - P1) |
| Existing Site Sections                       | 20123 - ASA - V0 - XX - DR - A - PL26 - (S2 - P1) |
| Proposed Site Plan                           | 21023 - ASA - V0 - XX - DR - A - PL03 - (S2 – P3) |
| Proposed Block Plan                          | 21023 - ASA - XX - XX - DR - A - PL18 - (S2 - P1) |
| Proposed Warehouse Ground Floor Plan         | 21023 - ASA - V1 - P0 - DR - A - PL04 - (S2 – P2) |
| Proposed Warehouse First Floor Plan          | 21023 - ASA - V1 - P1 - DR - A - PL05 - (S2 – P2) |
| Proposed Warehouse Plant Deck                | 21023 - ASA - V1 - P2 - DR - A - PL06 - (S2 – P2) |
| Proposed Warehouse Roof Plan                 | 21023 - ASA - V1 - P3 - DR - A - PL07 - (S2 – P2) |
| Proposed Warehouse Elevations                | 21023 - ASA - V1 - XX - DR - A - PL08 - (S2 – P3) |
| Proposed Warehouse Sections                  | 21023 - ASA - V1 - XX - DR - A - PL09 - (S2 – P2) |
| Proposed Van Deck GF Plan                    | 21023 - ASA - V2 - V0 - DR - A - PL10 - (S2 – P3) |
| Proposed Van Deck Upper Level Plans          | 21023 - ASA - V2 - XX - DR - A - PL11 - (S2 – P2) |
| Proposed Van Deck Elevations                 | 21023 - ASA - V2 - XX - DR - A - PL12 - (S2 – P4) |
| Proposed Van Deck Sections                   | 21023 - ASA - V2 - XX - DR - A - PL13 - (S2 – P4) |
| 3D Views                                     | 21023 - ASA - V0 - XX - DR - A - PL14 - (S2 – P4) |
| 3D Street Views                              | 21023 - ASA - XX - XX - DR - A - PL16 - (S2 – P3) |
| Proposed Site Sections                       | 21023 - ASA - V0 - XX - DR - A - PL15 - (S2 – P4) |
| Flood Compensation Area                      | 21023 - ASA - XX - XX - DR - A - PL17 - (S2 – P1) |
| Proposed Boundary Details                    | 21023 - ASA - V0 - XX - DR - A - PL20 - (S2 - P1) |
| Proposed Ancillary Structures Sheet 1        | 21023 - ASA - V0 - XX - DR - A - PL21 - (S2 - P2) |
| Proposed Ancillary Structures Sheet 2        | 21023 - ASA - V0 - XX - DR - A - PL22 - (S2 - P2) |



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|                                       |                                                   |
|---------------------------------------|---------------------------------------------------|
| Proposed Sprinkler Tanks & Pump House | 21023 - ASA - V0 - XX - DR - A - PL23 - (S2 - P2) |
| Proposed Waste Platform               | 21023 - ASA - V0 - XX - DR - A - PL24 - (S2 - P2) |
| Proposed Guard Shack                  | 21023 - ASA - V0 - XX - DR - A - PL25 - (S2       |

1.7 The remainder of this Statement is set out as follows:

- Section 2 describes the site and the surrounding area;
- Section 3 sets out the planning history for the Site;
- Section 4 summarises informal discussions held between the Applicant and Arun District Council prior to the submission of the application;
- Section 5 explains the proposals for the site that are the subject of this planning application;
- Sections 6-7 assesses the proposed development against the relevant national and local planning policies and other material considerations; and
- Section 8 sets out our overall conclusions on the planning merits of the proposals.

#### Summary of Planning Benefits

1.8 As set out in this Planning Statement the proposed development is considered to provide a significant number of planning benefits to the local community both in Bognor Regis and the wider region. Further details of the benefits are set out within the corresponding technical assessment work, however are summarised as follows:

- The build to suit facility and associated operational van storage deck are to meet the specific requirements of an end user who are keen to be operational on site as soon as possible. To this end we are seeking to avoid any pre-commencement conditions being imposed on the permission to enable a swift start on site to meet their ambitious timescales to be on site.
- The redevelopment of land at Oldlands Farm represents the delivery of a strategic scale site allocated in the Development Plan which continues the recent successful development of the Oldlands Farm site.
- The Site forms part of Enterprise Bognor Regis and is a location being actively supported for employment development by the Local Planning Authority.
- The development will generate a significant number of local jobs both during construction and once operational. There will be further indirect economic growth through the



increased use of facilities in Bognor Regis generated by the increased number of people visiting the centre.

- All works on the Site will be carried out in accordance with the recommendations of the Ecological Appraisal submitted with the application to avoid inadvertent damage to habitats on, or surrounding, the Site. This includes measures to protect nesting birds, reptiles, bats and other species. Furthermore, ecological enhancements are proposed to support wildlife.
- The development provides a significant amount of landscaping to strengthen and enhance biodiversity, in addition to ensuring that trees subject of TPOs are protected during construction and operation of the Site. Full details are shown on the landscaping plan submitted.
- The development incorporates measures to produce 13.5% of the total predicted energy requirements from renewable or low carbon energy generation (compared to Part L 2013 building emission rate). This is achieved by the proposals including an array of photovoltaic panels generating 60kWp of energy.
- The Travel Plan submitted sets out initiatives and measures to reduce single-occupancy car travel and increase travel by more sustainable modes including cycling and walking.
- A significant amount of car parking spaces and operational van storage spaces will be for electric vehicles, with passive provision for additional spaces to allow for further electric vehicle charging in the future.
- The lighting proposed is carefully designed to prevent impacts on residential amenity and road users of the A259. The lighting has been designed to minimise impacts on bats and has been confirmed as acceptable by the project Ecologist.



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## 2.0 SITE LOCATION, DESCRIPTION AND PLANNING HISTORY

### Site Location and Description

- 2.1 The Site is located within the Oldlands Farm employment area, on the north edge of the Bognor Regis settlement boundary, in addition to land to the north of the A259. The application falls within the administrative area of Arun District Council ('the Council' and/or 'the LPA').
- 2.2 The Site comprises of arable/pastoral farmland with hedgerows and matures trees at the site boundaries. There is also a public footpath running through the northern end of the main site (footpath Aldingbourne 152-1) which forms part of a route connecting Shripney to Bognor Regis. The Site is also intersected by the Felpham Relief Road (A259).
- 2.3 The Site is set within an area which is characterised as being industrial by virtue of a number of proximate commercial buildings, albeit land to the north and east of the Site is rural in nature. The site is from a service road to the east of the A29.
- 2.1 The Site's northern boundary is made up of farmland, beyond which is a cluster of houses and farm buildings accessed by Sack Lane. Towards the east, the Site borders the Great Western Railway Line which runs broadly north to south, beyond which is more farmland and Bognor Regis Golf Club. Bognor Regis Train Station is located approximately 2.6 km to the south.
- 2.2 The Site neighbours two warehouse units to the South which are occupied by Rolls Royce, who are served by an internal service road. To the south west of the Site is an attenuation pond, beyond which is cleared land. A discount convenience retail food store was recently granted consent on the most western part of this land facing onto the A29 which is to be occupied by Lidl.

### Policy Designations

- 2.3 The Site is located within the Strategic Employment Site 'Oldlands Farm' and is situated within the adopted 'Built-up Area Boundary' of Bognor Regis. Local Plan Policy EMP DM2 ('Enterprise Bognor Regis') identifies the areas constituting Enterprise Bognor Regis are allocated to promote economic growth in Bognor Regis and the wider Coastal West Sussex sub-region. Adjacent to the Site beyond the railway line to the east is a designated Biodiversity Opportunity Area.
- 2.4 The Environment Agency's online Flood Risk Map identifies the Site is predominantly located within Flood Zone 2 with small sections of the Site located in Flood Zone 3.
- 2.5 There are no statutorily Listed Buildings on the Site or immediate surrounding area. The closest listed buildings are in Shripney, circa 800 metres to the west. The village of Shripney is designated



as a Conservation Area located approximately 770 metres from the Site. There are also a number of locally listed 'Buildings or Structures of Character' within Shripney.

- 2.6 There are no environmental designations that apply to the Site directly. The Environment Agency's Magic Map shows the Site and surrounding area is within an SSSI Impact Zone.

### 3.0 PLANNING HISTORY

- 3.1 The Site forms part of a wider plot where hybrid permission was granted on 20<sup>th</sup> April 2016 (reference AL/58/15/OUT) for full planning permission for earth works to facilitate a flood compensation area and outline permission (with all matters reserved) for up to 20,453 sqm of B2 General Industrial Floorspace together with B8 warehousing & distribution floorspace. The application boundary included further land to the south west (now occupied by the Rolls Royce warehouses pursued under a separate consent) as well as land to the north west of the Site (beyond the A259) to act as a flood compensation area.
- 3.2 Following an amendment to the permission via Section 73 consent AL/57/16/PL to amend the floorspace restrictions for B2 and B8 developments, consent for all reserved matters were granted for the Site under reference AL/44/18/RES for a 4 unit industrial scheme, which comprised of 3 units totalling 7,041 sqm of Class B2 floorspace and 1 unit totalling 10,610 sqm of Class B8 floorspace.
- 3.3 Notwithstanding, the outline planning permission lapsed on 20<sup>th</sup> April 2019 and the aforementioned reserved matters consent lapsed on 13<sup>th</sup> December 2020.
- 3.4 Table 2.1 lists other applications relevant to the Site. The Site's planning history demonstrates the Site currently has no existing lawful use.

Table 2.1 – Planning History

| APPLICATION REFERENCE | DESCRIPTION                                                                                                                                                                                                                                                                      | DECISION | DECISION DATE                  |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|--------------------------------|
| AL/44/18/RES          | Application for all reserved matters following outline consent AL/58/15/OUT (Hybrid Application) for up to 20,453 sqm of B2 general industrial floorspace together with B8 warehousing & distribution floorspace (as amended by subsequent Variation of Conditions 11, 12 & 37). | Approved | 13 <sup>th</sup> December 2018 |
| AL/27/18/DOC          | Approval of details reserved by condition imposed under AL/58/15/OUT relating to condition 19-parameter plan & design code.                                                                                                                                                      | Approved | 20 <sup>th</sup> April 2018    |
| AL/57/16/PL           | Variation of conditions 11,12 and 37 of AL/58/15/OUT                                                                                                                                                                                                                             | Approved | 9 <sup>th</sup> September 2016 |
| AL/58/15/OUT          | Hybrid Application 1: Full planning application for earth works to facilitate                                                                                                                                                                                                    | Approved | 20 <sup>th</sup> April 2016    |



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|  |                                                                                                                                                                                         |  |  |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
|  | flood compensation area & 2-Outline application (all matters reserved) for up to 20,453 sq m of B2 General Industrial Floorspace together with B8 warehousing & distribution floorspace |  |  |
|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|



## 4.0 INFORMAL PRE-SUBMISSION MEETING

- 4.1 The application has been submitted following an informal meeting on 2 June 2021 with Mr Karl Roberts, Director of Place at Arun District Council, attended by Hanbury Properties Limited and DWD.
- 4.2 Hanbury Properties Limited explained its recent history at Oldlands Farm where it has successfully obtained permission and developed multiple schemes, including the existing Rolls Royce warehouses and recently constructed Lidl supermarket. The purpose of the meeting was to table the proposed development and seek initial feedback from Arun District Council.
- 4.3 A draft site layout was submitted for comment alongside indicative CGI elevations and street scenes of the development in the context of existing buildings. As would be expected the CGIs related primarily to the scale of the built form and did not include specific details of the material treatments for the warehouse and van storage deck, or scheme of landscaping.
- 4.4 The informal discussions held were positive with Mr Roberts setting out key recommendations for further consideration and work ahead of the application being submitted. The primary feedback related to the appearance of the van storage deck and that it would be important to ensure that this would be well designed given it will be visible from the A259 road. While the details shown on the CGIs were somewhat limited, Mr Roberts commented that the appearance of the deck could be improved with sensitive cladding treatments and elevational features.
- 4.5 It was acknowledged at the meeting that the information provided was in draft and subject of further work in the lead up to submission. Following feedback received at the meeting, the appearance of the van storage deck has been enhanced. The van storage deck is required to be open sided for both fire safety and ventilation purposes, however the proposals feature bands of horizontal perforated cladding to provide aesthetic interest into the façade, while also providing edge protection and screening headlights from vehicles within the van storage deck.
- 4.6 A detailed landscaping scheme has been submitted with the planning application which has been designed to enhance the visual appearance of the site. Following feedback provided by Mr Roberts, the species selected for planting on the northern boundary of the Site will also part screen the van storage deck and other prominent features on the Site. The landscaping scheme is considered to significantly enhance the Site's green credentials.



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## 5.0 PROPOSED DEVELOPMENT

5.1 The proposed development is for a purpose-built last mile distribution warehouse with ancillary office and associated vehicle parking, van storage, plant, ancillary structures, lighting landscaping and infrastructure works. The proposals also include earthworks to facilitate a flood compensation area to the north of the A259.

5.2 The proposed description of development is set out below:

*“Erection of a warehouse (Use Class B8) with ancillary office, associated vehicle parking, van storage, plant, ancillary structures, lighting, landscaping and infrastructure works including earthworks to facilitate flood compensation area”.*

### Amount

5.3 The proposed development comprises of the erection of a warehouse building with a floor area of 11,412 sqm (GIA) which is proposed to be used as a storage and distribution facility (Class B8). The total floorspace includes an ancillary office area across the ground and first floor of the facility which is required to aid with the operational requirements of the end user.

5.4 In order to support the main function of the warehouse the proposed development proposes a van storage deck and associated loading canopy to the north of the proposed warehouse building. The proposed development also comprises of other ancillary structures throughout the Site associated with the primary function of the warehouse, including a driver welfare unit, guard huts and a winter module storage enclosure.

### Design and Scale

5.5 The proposed development comprises the erection of a warehouse building which has been designed to meet the operational requirements of an end user. The internal layout of the proposed unit proposes to locate the ancillary office floorspace to the western façade of the unit so to create a frontage.

5.6 The proposed warehouse will have a maximum roof parapet height of 15.9 metres from finished floor level is proposed with an eaves height of 13.1 meters. The development also includes a van storage deck to the north of the warehouse, proposed to be laid out over 4 levels (ground plus three) which will provide operational van storage spaces.

5.7 The proposed development is to provide a distinctive front western elevation to highlight the main access and focal point for the majority of staff and visitors to the Site. This is the main viewpoint for all motorists also passing on the A259 and those using the access road for neighbouring uses



(Lidl). The materials proposed are to be of a high quality and are set out in detail within the proposed elevations, including horizontal composite cladding and an aluminium curtain walling system.

5.8 The van storage deck is proposed to be sited at the north of the proposed warehouse and will feature stair cores for staff access to the vans stored above ground floor level. Stair cores feature in each corner of the structure and the development has been designed with the use of light coloured cladding with a consistent opening elaborating on the horizontal feature of the deck. The cladding is proposed to be laid horizontally and the use of similar materials for both the new warehouse building and the van storage deck ensures that the two features complement each other and are seen as a single industrial development across the Site.

5.9 In terms of sustainability, the warehouse building proposes to include 60kWp mounted photovoltaic panels on the roof in order to generate on-site energy requirements. Other low energy and energy efficient materials and design considerations have been included, which are set out in detail within the accompanying Energy and Sustainability Statement.

5.10 To facilitate the efficient operation of the site, the proposed development includes the following infrastructure associated with the storage and distribution facility usage:

- Automated vehicle barriers and a manual access gate;
- Security gates and a guard shelter;
- Smoking shelter;
- Transformers and substations; and
- Sprinkler tanks and pump house.

#### Access

5.11 Access is proposed via the existing estate road to the south west of the Site which shall in turn connect to the proposed internal service road connecting the proposal to the local highway network.

5.12 With regards to pedestrian access, the existing estate road to the south west of the Site will be utilised, which connects to the wider public footpath network connecting to Bognor Regis to the south.

5.13 A public footpath runs through part of the site (footpath Aldingbourne 152-1) and it is proposed to alter the route around the northern and eastern edge of the site.



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#### Parking

- 5.14 Surface level parking for staff and visitor's will be located to the west of the Site, providing a total of 193 no. car parking spaces, in addition to 9 no. disabled parking bays and 20 no. motorcycle parking spaces. Of the car parking spaces, 66 no. will comprise of active electric vehicle charging bays.
- 5.15 Secure and covered cycle parking totalling 40 no. secure cycle parking spaces will be provided in shelters located at the south of the Site in the vicinity of the main entrance to the warehouse.
- 5.16 In addition to the above, there are 6 HGV docking stations proposed on the western elevation of the proposed warehouse building.

#### Van Storage

- 5.17 Due to operational requirements, there are three areas proposed at the Site for the storage and loading of delivery vans as set out below:
- The van storage areas which comprise the upper levels of the deck to the north of the Site providing 512 no. spaces;
  - The van waiting area located to the north of the proposed building which has 48 no. spaces; and
  - The van loading area located to the north of the proposed building.
- 5.18 The van storage deck will comprise a four-tier decked storage structure with 512 no. spaces for the storage of vans associated with the new facility. The van storage deck is considered to be similar in terms of scale and massing to the existing warehousing units on the neighbouring Rolls Royce site and the new warehouse building proposed.

#### Landscaping

- 5.19 The Site currently comprises of predominantly semi-improved grassland with lengths of drainage ditches, fencing and hedgerows. A collection of trees on the Site are subject of Tree Preservation Orders (TPOs) (TPO reference TPO/BE/2/19).
- 5.20 The proposed landscaping scheme, as prepared by Delta Simons, seeks to implement a detailed landscaping scheme, proposing a range of native trees and shrubs alongside hard landscaped areas to assist with the functioning of the proposed development. The trees covered by TPOs on the Site are to be retained and development is proposed outside of their root protection areas. The development has been designed to treat these trees carefully, with various arboricultural strategies



proposed. The proposed amended route of the public right of way has also been supported by a range of tree planting, in addition to meadow grassland and shrubbery planting.

- 5.21 A Flood Compensation Area is also proposed to the north of the A259 which shall be profiled to accommodate any additional flood water from the southern part of the Site.

#### Lighting Scheme

- 5.22 In order to ensure the Site can operate in a safe manner the proposed development includes an external lighting scheme which comprises lights set upon lighting columns across the Site. The proposed lighting scheme also contributes to improving Site safety and reducing the fear of crime for those on site.
- 5.23 In the interest of highway safety, the design of the external lighting ensures that artificial light does not impact the road users of the A259. The lighting scheme has also been sympathetically designed in order to avoid any adverse impact on ecology or sensitive receptors, both on and neighbouring the Site, such as the cluster of TPO trees. For further details on the lighting proposed please refer to the External Lighting Strategy Report prepared by KTA submitted with the application.

#### Refuse and recycling

- 5.24 Waste is proposed to be collected, sorted and taken to the waste storage and collection area adjacent to the service yard at the western elevation.



## 6.0 PLANNING POLICY CONSIDERATIONS

### Planning Policy Context

#### Adopted Policies

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, if regard is to be had to the development plan for the purpose of determining planning applications, then determination must be made in accordance with the development plan, unless material considerations indicate otherwise.
- 6.2 The Development Plan for Arun District Council relevant to the Site comprises of the following:
- Arun District Council Local Plan and accompanying Proposals Map (July 2018); and
  - The Aldingbourne Neighbourhood Plan 2014-2034 (October 2016).
- 6.3 In addition to the adopted Development Plan Documents, material consideration must be given to the following documents:
- National Planning Policy Framework (June 2019);
  - Arun District Council Parking Standards Supplementary Planning Document (January 2020); and
  - Arun District Council Archaeology Supplementary Planning Document (September 2003).
- 6.4 Below is a summary of the key adopted planning policies that are relevant to the Site, with the adopted policies listed first, followed by the emerging policies that have also been considered.

### Development Plan Policies

#### Employment

- 6.5 **Local Plan Policy EMP SP1** (Strategic Economic Growth) highlights the Council, with partners, will promote the sustainable growth of the District's economy to meet the varying needs of different economic sectors.
- 6.6 **Local Plan Policy EMP SP3** (Strategic Employment Land Allocations) states the strategic allocations will:
- a. Provide significant new employment opportunities to support the objectives of reducing out commuting and creating local jobs;
  - b. Provide employment-led development to support the objective of providing a new role for Bognor Regis Littlehampton and Angmering complementing other new planned investment.



- c. Provide different types and sizes of employment space to meet a range of modern business and sector needs, capable of accommodating indigenous and inward investment requirements;
- d. Deliver new infrastructure to meet the requirements of businesses that can provide wider benefits for the sub-region; and
- e. Need to be developed with consideration and enhancement of landscape character, designated and other protected habitats and species, air and water quality.

6.7 **Local Plan Policy EMP DM1** (Employment Land: Development Management) seeks to promote the enhancement of existing employment sites. The policy also state the Council will positively encourage the relocation of existing firms wishing to expand within Arun District where this will improve their economic and environmental sustainability, improve the local environment for local residents and/or enhance the sustainable development potential of adjoining sites.

6.8 **Local Plan Policy EMP DM2** (Enterprise Bognor Regis) outlines that the superseded 2003 Arun District Local Plan promoted new employment development in Bognor Regis through the allocation of land at Oldland's Farm for employment development. The Policy states areas constituting Enterprise Bognor Regis, identified as Sites 1-4 of the Strategic Employment Land Allocation (with the Site being within Site 3) are allocated to promote economic growth in Bognor Regis and the wider Coastal West Sussex sub-region, outlining a phased mix of B1, B2 and B8 uses will be supported, where the following are addressed:

- a. Suitable upgrading and provision of access and/or junctions to the A29/A259 and Rowan Way as appropriate;
- b. A suitable Transport Assessment and Travel Plan demonstrating how the impacts of development can be mitigated and to improve a modal shift towards an increase in sustainable transport;
- c. Appropriate flood mitigation works;
- d. Connection to the existing sewerage system off-site at the nearest point of adequate capacity and where located within a flood risk area a sealed sewerage system;
- e. A suitable habitat assessment, and where necessary, mitigation measures to ensure no overall loss of biodiversity given the importance of the area in relation to wildlife, particularly protected species;
- f. A high standard of design and landscaping to maximise the 'gateway' location of the sites;
- g. Suitable screening to protect the amenity of existing residents; and



- h. Development proposals incorporating retail, leisure or office development should demonstrate that the proposal satisfies the sequential test and impact test in accordance with national planning policy.

6.9 **Local Plan Policy EMP SP3** (Strategic Employment Land Allocations) confirms the Site falls within a Strategic Employment Land Allocation, within Site 3 'Oldland Farm' of the 'Entreprise Bognor Regis' location. The Policy also sets out the strategic allocations will:

- a. Provide significant new employment opportunities to support the objectives of reducing out commuting and creating local jobs;
- b. Provide employment-led development to support the objective of providing a new role for Bognor Regis Littlehampton and Angmering complementing other new planned investment;
- c. Provide different types and sizes of employment space to meet a range of modern business and sector needs, capable of accommodating indigenous and inward investment requirements;
- d. Deliver new infrastructure to meet the requirements of businesses that can provide wider benefits for the sub-region; and
- e. Need to be developed with consideration and enhancement of landscape character, designated and other protected habitats and species, air and water quality.

6.10 **Local Plan Policy EMP DM1** (Employment Land: Development Management) states the Council will seek to protect and enhance existing employment sites and premises in order to maintain a supply of good quality commercial sites and premises to meet the needs of businesses and the local economy.

6.11 **Local Plan Policy SKILLS SP1** (Employment Skills) states the Council will encourage development proposals that increase employability and address barriers to employment for economically inactive people.

6.12 **Neighbourhood Plan Policy EE1** (Supporting existing employment and retail) states development proposals to upgrade or extend existing employment sites will be supported provided that the impact on the amenities of surrounding properties is acceptable and subject to the other policies in this Plan.



6.13 **Neighbourhood Plan Policy EE3** (Supporting for new commercial uses) sets out new commercial development will be supported subject to complying with other policies within this development Plan.

Design and Character

6.14 **Local Plan Policy SD SP2** (Built-up Area Boundary) sets out that development should be focused within the Built Up Area Boundaries and will be permitted, subject to consideration against other policies of this Local Plan.

6.15 **Local Plan Policy D SP1** (Design) sets out overarching guidance with regards to the design of new developments within the District. The Policy outlines all development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details.

6.16 **Local Plan Policy D DM1** (Aspects of form and design quality) provides more detailed planning policy guidance with regards to the aspects of design quality assessed. This comprises of the follow aspects:

- Character;
- Appearance / attractiveness;
- Impact;
- Innovation;
- Adaptability;
- Crime prevention;
- Trees and woodland;
- Solar gain;
- Public realm;
- Layout – movement and legibility;
- Public art;
- Density;
- Scale; and
- Aspects of form and design quality.



6.17 **Neighbourhood Plan Policy H9** (Attention to detail) outlines that a variety of design features must be considered early in the design process and integrated into the overall scheme, including; bin stores and recycling facilities; cycle stores; lighting; flues and ventilation ducts; and gutters and pipes.

Sustainability

6.18 **Local Plan Policy ECC SP1** (Adapting to climate change) states the Council will support development which is located and appropriately designed to adapt to impacts arising from climate change such as the increased probability of tidal and fluvial flooding; water stress; health impacts as a result of extreme temperatures and a decline in the quality of habitats and richness of biodiversity.

6.19 **Local Plan Policy ECC SP2** (Energy and climate change mitigation) the Policy outlines new commercial developments will be expected to be energy efficient and to demonstrate how they will:

- a. Achieve energy efficiency measures that reflect the current standards applicable at the time of submission;
- b. Use design and layout to promote energy efficiency; and
- c. Incorporate decentralised, renewable and low carbon energy supply systems, for example small scale renewable energy systems such as solar panels.

6.20 The Policy also highlights all major developments must produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site, unless it can be demonstrated that this is unviable.

Flood Risk and Drainage

6.21 **Local Plan Policy W DM2** (Flood Risk) highlights development in areas at risk from flooding will only be permitted where all of the following criteria have been satisfied:

- a. The sequential test in accordance with the National Planning Policy Guidance has been met.
- b. A site specific Flood Risk Assessment demonstrates that the development will be safe, including access and egress, without increasing flood risk elsewhere and reduce flood risk overall.
- c. The sustainability benefits to the wider community are clearly identified.
- d. The scheme identifies adaptation and mitigation measures.
- e. Appropriate flood warning and evacuation plans are in place.



- f. New site drainage systems are designed to take account of events which exceed the normal design standard i.e. consideration of flood flow routing and utilising temporary storage areas.

6.22 **Local Plan Policy W DM3** (Sustainable Urban Drainage Systems) prescribes the below criteria for developments which implement Sustainable Urban Drainage Systems ('SUDS'), stating prior to construction, developers must:

- a. Follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations and the SUDS manual produced by CIRIA.
- b. Undertake up to six months groundwater monitoring within the winter period.
- c. Undertake winter percolation testing in accordance with BRE365.
- d. The proposed drainage system must be designed to ensure that there is no flooding on a 1 in 30 year storm event.
- e. The design must also take account of the 1 in 100 year storm event plus 30% allowance for climate change, on stored volumes, to ensure that there is no flooding of properties or the public highway or inundation of the foul sewerage system. Any excess flows must be contained within the site boundary, and within designated storage areas.

6.23 **Neighbourhood Plan Policy EH4** (Protection of watercourses) states proposals that reduce flood risk will be supported

6.24 **Neighbourhood Plan Policy EH5** (Surface Water Management) outlines for new development, within areas at risk from flooding, will not be permitted unless it is supported by a site-specific Flood Risk Assessment which provides clear evidence to demonstrate that the proposal:

- a. Would not give rise to additional risk of flooding, either to the development site or to other land, arising from the carrying out or use of the development;
- b. Would make appropriate provision for accommodating the surface water and foul water arising from the development

#### Landscape, Biodiversity and Trees

6.25 **Local Plan Policy ENV SP1** (Natural Environment) states the Council will encourage and promote the preservation, restoration and enhancement of biodiversity and the natural environment. The



Policy also outlines that where possible they shall also promote the creation of new areas for habitats and species.

6.26 **Local Plan Policy ENV DM3** (Biodiversity Opportunity Areas) states development shall:

- a. Retain and sympathetically incorporate locally valued and important habitats, including wildlife corridors and stepping stones
- b. Be designed in order to minimise disturbance to habitats

6.27 The policy also states the development proposals that do not reasonably address opportunities for enhancing these through their design, layout and landscaping or access/management shall not be permitted. Where a development scheme would result in a habitat loss, mitigation measures will be proposed as part of the proposed scheme and such measures agreed with the Local Planning Authority prior to the determination of any planning application.

6.28 **Local Plan Policy ENV DM4** (Trees) highlights that where there are existing trees on or adjacent to a development site, developers will be required to provide a land and tree survey, a tree constraints plan and an arboricultural impact assessment (including a tree protection plan and arboricultural method statement).

6.29 **Local Plan Policy ENV DM5** (Development and biodiversity) states development schemes shall, in the first instance, seek to achieve a net gain in biodiversity and protect existing habitats on site. The Policy also sets out the incorporation of elements of biodiversity (bat and bird boxes etc.) as well as landscape features to minimise adverse impacts on existing habitats whether designated or not.

6.30 The Policy also highlights the Council will expect development to be appropriately designed to facilitate the emergence of new habitats through the creation of links between habitat areas and open spaces.

6.31 **Local Plan Policy WM DM1** (Waste Management) states development anticipated to cost over £300,000 must identify the volume and type of materials to be demolished and/or excavated as part of the development. Opportunities for the re-use and recovery of materials on site must be demonstrated and off-site disposal of waste must be minimised and managed.

6.32 **Neighbourhood Plan Policy EH2** (Green Infrastructure and Ecosystems Services) sets out that new development immediately adjacent to the Biodiversity Corridors will only be supported where it can be clearly demonstrated that development proposals will not give rise to any significant harm



to the integrity or function of the Biodiversity Corridors. The land to the east of the Site, beyond the railway line, is an allocated Biodiversity Corridor.

6.33 **Neighbourhood Plan Policy EH6** (Protection of Trees and Hedgerows) states development that damages or results in the loss of trees of arboricultural and amenity value or loss of hedgerows and/or priority habitat, or which significantly damages ecological networks will be resisted, unless the need for, and benefits of, development in that location clearly outweigh the loss.

Transport, Access and Parking

6.34 **Policy T SP1** (Transport and Development) seeks to reduce congestion within the district and seeks to ensure development provides safe access on to the highway network, contributes to highway improvements and promotes sustainable transport, including the use of low emission fuels, public transport improvements and the cycle, pedestrian and bridleway network.

6.35 The Policy states the Council will support transport and development which:

- a. Is designed to reduce the need to travel by car by identifying opportunities to improve access to public transport services and passenger transport services whilst making provision for safe access to the highway network through improvements to the existing road network and the promotion of vehicles which use low-carbon energy;
- b. Is incorporated into the District's green infrastructure network and gives priority to pedestrian and cycle movements;
- c. Protects committed and indicative lines of major road schemes from development and, where applicable, contributes towards new road schemes which improve north-south links between Bognor Regis and Littlehampton and the A27, to ensure that they are delivered in line with strategic growth in the District;
- d. Incorporates appropriate levels of parking in line with West Sussex County Council guidance on parking provision and the forthcoming Arun Design Guide taking into consideration the impact of development upon on-street parking;
- e. Is supported by an effective and deliverable Transport Assessment which demonstrates that the transport effects of development on the local and strategic road network can be satisfactorily mitigated and a Travel Plan, which is effective and deliverable;
- f. Explains how the development has been designed to:
  - i. accommodate the efficient delivery of goods and supplies;
  - ii. give priority to pedestrian and cycle movements and have access to high quality public transport facilities;



- iii. create safe and secure layouts for traffic, cyclists and pedestrians whilst avoiding street clutter;
  - iv. incorporate facilities for charging electric and plug-in hybrid vehicles (where charging facilities are to be omitted from the development, evidence of market demand and viability must be provided); and
  - v. consider the needs of people with disabilities by all modes of transport.
- g. Provides improved crossing points over the railway line to improve transport links between the coast and the A27, in particular at Ford.

6.36 **Local Plan Policy T DM1** (Sustainable Travel and Public Rights of Way) outlines the Policy reflects the aims of promoting sustainable transport by ensuring new development ensures ease of movement, prioritising safe pedestrian and cycle access to the green infrastructure network and access to public transport and community transport services where a need has been identified.

6.37 With regards to Public Rights of Way, the Policy states access to alternative modes of transport including public transport services, including public right of way, must be available and accessible to all members of the community.

6.38 **Neighbourhood Plan Policy GA1** (Promoting sustainable movement) outlines that development proposals that increase travel demand will be supported where they can demonstrate that:

- They extend or improve walking and cycling routes by making land available for those purposes or by means of financial contributions through legal agreements or (when adopted for the District) the Community Infrastructure Levy;
- They are located in places accessible to public and community transport or can improve the accessibility of the site to public and community transport by contributing to the provision of enhanced services;
- They do not result in the loss of any existing footpaths or cycle path

6.39 **Neighbourhood Plan Policy GA2** (Footpath and cycle path network) highlights the loss of existing footpaths and cycle paths will be resisted.

6.40 **Neighbourhood Plan Policy GA3** (Parking and new development) states proposals must provide adequate parking in accordance with the standards adopted at the time. Proposals that would result in a loss of parking spaces either on or off street will be resisted.



6.41 **Neighbourhood Plan Policy EE9** (Sustainable Commercial and Employment Buildings) sets out all new commercial and employment development, where it would be appropriate, shall be designed to provide secure parking and storage of bicycles for customers and employees consistent with the relevant standards produced by West Sussex County Council.

Amenity and Pollution

6.42 **Local Plan Policy QE SP1** (Quality of the environment) highlights the Council requires all development to contribute positively to the quality of the environment to will ensure that development does not have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities.

6.43 **Local Plan Policy QE DM1** (Noise Pollution) outlines that for new noise generating development, the Council will request a noise report which provides accurate information about the existing noise environment, and the likely impact of the proposed development upon the noise environment. The report must also demonstrate that the development meets appropriate national and local standards for noise, as set out in Annex 1 of the Planning Noise Advice Document: Sussex, and any mitigation measures required to ensure noise is managed to an acceptable level.

6.44 In addition to the above, the Policy also states the requirement for evidence to demonstrate that the development will not impact upon areas identified and valued for their tranquillity, including Gaps Between Settlements.

6.45 **Local Plan Policy QE DM2** (Light Pollution) confirms that planning permission for proposals which involve outdoor lighting must be accompanied by a lighting scheme prepared according to the latest national design guidance and relevant British Standards publications. The Policy also sets out that outdoor lighting schemes will be considered against the following criteria:

- a. No adverse impact on neighbouring uses or the wider landscape, particularly with regard the South Downs International Dark Sky Reserve designation;
- b. Light levels being the minimum required for security and working purposes;
- c. Minimising the potential glare and spillage; and
- d. The degree to which outdoor lighting can be powered by on-site renewable sources.

6.46 In addition to the above, the Policy also notes that where appropriate, the Local Planning Authority may seek to control the times of illumination.



- 6.47 **Local Plan Policy QE DM3** (Air Pollution) outlines all major development proposals will be required to assess the likely impacts of the development on air quality and mitigate any negative impacts.

Contamination

- 6.48 **Local Plan Policy QE DM4** (Contaminated land) states that prior to any development, the Council will require evidence to show that unacceptable risk from contamination will be successfully addressed through remediation without undue environmental impact during and following the development.

Archaeology

- 6.49 **Local Plan Policy HER DM6** (Sites of Archaeological Interest) sets out there will be a presumption in favour of the preservation of archaeological remains. Noting where proposed developments are on a site on which development is proposed has the potential to include heritage assets with archaeological interest (having consulted the Historic Environment Record) permission will only be granted where it can be demonstrated that development will not be harmful to the archaeological interest of these sites.

**Material Considerations**

National Planning Policy Framework (2019)

- 6.50 In February 2019 (as updated in June 2019), the Government published the revised National Planning Policy Framework (NPPF) which sets out the Government's planning policies for England and how these are expected to be applied.
- 6.51 Paragraph 8 of the NPPF sets out the overarching objectives to achieving sustainable development which include the following:
- Economic – Building a strong, responsive and competitive economy by supporting growth, innovation and improved productivity and by identifying and coordinating the provision of infrastructure;
  - Social – Fostering a well-designed and safe built environment, with accessible services that reflect current and future needs; and
  - Environmental – To contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, minimising waste and pollution and mitigating and adapting to climate change.



- 6.52 Paragraph 11 states that at the heart of the NPPF is a presumption in favour of sustainable development, which should be applied by approving development proposals that accord with an up-to-date development plan without delay (section 11c).
- 6.53 Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless there is a clear reason for refusing the proposal (based on NPPF policies that protect areas or assets of particular importance), or any adverse impacts of doing so would significantly or demonstrably outweigh the benefits, when assessed against the NPPF taken as a whole (paragraph 11d).
- 6.54 Paragraph 80 of the NPPF promotes economic growth and states that decisions should “help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and addresses the challenges of the future”. Local Planning Authorities are required to make provision for storage and distribution operations at a variety of scales and in suitable accessible locations (paragraph 82).
- 6.55 Paragraph 102 requires the environmental impacts of traffic and transport infrastructure to be identified, assessed and taken into account. In addition, it should be ensured that safe and suitable access can be achieved for all users (paragraph 108). Developments should create places that are safe, secure and attractive, and that minimise the scope for conflicts between pedestrians and vehicles (paragraph 110).
- 6.56 Paragraph 117 states Local Planning Authorities are required to promote an effective use of land in meeting the need for various uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 6.57 Paragraph 127 requires developments to be sympathetic to local character, including the surrounding built environment, and be visually attractive.

#### Supplementary Planning Documents

- 6.58 The Arun District Council Parking Standards Supplementary Planning Document (‘SPD’) (January 2020) provides the relevant parking standards for the District. Table 4.1 of the SPD sets out the vehicular and cycle parking provision standards for non-residential developments, which have been set out below. There are no standards for EV Charing for non-residential developments.

| Use Class | Vehicular | Cycle |
|-----------|-----------|-------|
|-----------|-----------|-------|



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|          |                     |                                                                           |
|----------|---------------------|---------------------------------------------------------------------------|
| Class B8 | 1 space per 100 sqm | 1 space per 500 sqm for staff<br>and 1 space per 1000 sqm for<br>visitors |
|----------|---------------------|---------------------------------------------------------------------------|

6.59 The Arun District Council Archaeology SPD (September 2003) is also relevant to the proposal.



## 7.0 PLANNING POLICY ASSESSMENT

### Principle of Development

- 7.1 The proposed scheme represents sustainable economic development on the basis that it would allow the Site to operate as an efficient last mile delivery facility serving the local area, from a site which is allocated for employment uses in the adopted Development Plan.
- 7.2 The proposed development seeks to develop a last mile distribution centre which has been designed to operate efficiently and successfully from the site, which should be afforded significant weight in accordance with national planning policy.
- 7.3 As identified in the Section 2, the Site's planning history demonstrates it has previously been considered to be an appropriate location for Use Class B8 development approved under permission AL/58/15/OUT alongside B2 floorspace. This relatively recent planning permission establishes the principle for the development of the Site.
- 7.4 In terms of planning policy, the Site is located within the Strategic Employment Site 'Oldlands Farm' and is situated within the adopted 'Built-up Area Boundary' of Bognor Regis. Local Plan Policy EMP DM2 ('Enterprise Bognor Regis') identifies the areas constituting Enterprise Bognor Regis are allocated to promote economic growth in Bognor Regis and the wider Coastal West Sussex sub-region, outlining a mix of B1, B2 and B8 uses will be supported.
- 7.5 Whilst the Site has no allocation within the Aldingbourne Neighbourhood Plan 2014-2034, Policy EE1 (Supporting existing employment and retail) states development proposals to upgrade or extend existing employment sites will be supported provided that the impact on the amenities of surrounding properties is acceptable and subject to the other policies in this Plan. Furthermore, Policy EE3 (Supporting for new commercial uses) sets out new commercial development will be supported subject to complying with other policies within the Development Plan.
- 7.6 The proposed development would enable the use of the allocated site for employment use. Furthermore, the proposed development will enable the proposed end user to reinforce their distribution network, engaging more critical workers and supporting an increased demand in E-commerce due to the current COVID-19 pandemic. The proposed development will also provide job opportunities and economic growth for the district.
- 7.7 We therefore consider the proposed use of the site as a last mile delivery facility to be compliant with national and local planning policy seeking to secure sustainable economic growth and productivity.



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Design and Character

- 7.8 As set out above, the proposed development has been designed to complement the industrial nature of the Site and its surrounding area, and makes use of materials and finishes that match those of the existing buildings.
- 7.9 As illustrated in the accompanying plans and 3D imagery, the proposals seek to reflect the prevailing scale of the adjacent developments to the south. The main building will have a maximum roof parapet height of 15.9 metres from finished floor level is proposed with an eaves height of 13.1m. This has been tailored to the end user requirements. The proposed warehouse building will be fully clad in varying tones of grey, in a banded arrangement which complement the window arrangements, to provide horizontal detailing to break up the elevations.
- 7.10 The proposed van storage structure will predominantly be open sided with bands of horizontal cladding to compliment the proposed warehouse, providing necessary edge protection and screening headlights. In terms of scale the stairwell parapet height will be a maximum of 16.3 metres from finished ground floor level. To maintain natural ventilation and reduce the overall height of the van store, the extent of enclosing walling has been kept minimal (additional height would be needed for mechanical ventilation).
- 7.11 The proposed materiality of the scheme reflects the industrial context of it's surrounding within this employment allocation and contributes towards the identity of the area and this part of Bognor Regis.
- 7.12 The scale and design of the warehouse and van storage deck is broadly similar to that of the neighbouring Rolls Royce site to the south and that previously approved under AL/58/15/OUT. The scale of the proposed development is therefore considered appropriate for the location of the site, reflecting the form of neighbouring scales within Enterprise Bognor Regis.
- 7.13 The location of the ancillary office on the western façade enhances the view of the unit from the relief road, creating a sense of welcome, improving the legibility of the unit and providing a safe route of access for staff and visitors.
- 7.14 The footprint and layout of the proposed development has been designed to meet the requirements of the proposed occupier and seeks to deliver a total of 11,467 sqm of floorspace in addition to an operational van storage deck. We consider the quantum of development on the Site to be appropriate given the historic permissions on the Site referenced above.



- 7.15 The land take associated with storing the fleet of delivery vans has been minimised through the design of the decked storage area, which enables the occupier to operate within the confines of this site without impacting on the natural or built environment in the vicinity.
- 7.16 The van storage area has been designed to complement the industrial nature of the site and its surrounding area, and reflects the prevailing scale of built development in the area. The use of a decked storage area is considered to be a more attractive solution, compared to an at-grade, off-site facility that would require a greater footprint to accommodate the required number of vehicles, and would not represent an efficient use of land in the borough.
- 7.17 Crime prevention has also been taken into account when preparing the scheme and a number of measures set out in the accompanying DAS outline the measures and features proposed which contribute to a secure site.

#### Public Right of Way

- 7.18 A public footpath runs through part of the application site (footpath Aldingbourne 152-1). A segment of this footpath is proposed to be diverted, related to part of the route between the Felpham Relief Road and the existing crossing at the railway line. The diversion of the public footpath will be pursued with West Sussex County Council under Section 257 of the Highways Act 1980.

#### Transport and Traffic

- 7.19 Vectos have been appointed to produce a Transport Assessment to consider the impacts of the proposals on the local highway network, which has been submitted in support of the current application.
- 7.20 The application site is accessible by a various means of transport. As well as being accessible by car from the service road connecting to the roundabout serving the A29 and A259, the site is accessible by bus from the stop located along Rowan Way circa 0.5 miles to the south west. Cycle parking is proposed as part of the development allowing employees to cycle work and store their bicycles safely.
- 7.21 The Site is well located to take advantage of the strategic highway network with its proximity to the A27, A29 and A259. In addition, the site is accessible by sustainable modes of transport, most notably by a number of shared footways / cycleways including on the A29 and A259 providing onward connections to the nearby residential areas as well as local amenities.



- 7.22 The proposed development is likely to result in an overall increase of 96 and 146 two-way vehicle trips in the AM and PM peak hours, respectively. When distributed across the local highway network, it can be seen that the greatest increase in vehicle movements will be experienced at the A29 / A259 / Site Access roundabout with an increase of 96 and 146 two-way vehicle movements during the AM and PM peak hours, respectively. This is considered to represent a negligible uplift that would be experienced in daily variations in traffic flow. As set out in the Transport Assessment, the proposed development is not considered to give rise to any severe transport impacts.
- 7.23 A Travel Plan has also been prepared by Vectos which sets out the strategy to support future staff and potential visitors in making informed decisions about their travel and provide staff with the necessary management tools to enable them to choose sustainable modes of travel to the site. It is expected that these strategies can be considered by the LPA and secured on a compliance basis.
- 7.24 The proposal is, therefore, considered to comply with national and local planning policy seeking to promote sustainable transport.

#### Car Parking

- 7.25 The proposed development includes staff and visitor car parking at the western part of the Site. The car park comprises 193 no. car parking spaces including 9 no. disabled bays, with 34 no. electric charging bays (totalling 35% provision).
- 7.26 The Council's Parking Standards SPD sets out the standards for car parking provisions for B8 employment uses as 1 per 100 sqm of floorspace which is recognised as being a guide for developers and site specific assessments can be utilised to justify alternative parking numbers.
- 7.27 The accompanying Transport Assessment states that applying this standard to the proposed development, this ratio would suggest a provision of 113 car parking spaces. A total of 193 no. parking spaces are proposed for staff inclusive of 9 no. disabled bays with 66 spaces supplying active vehicle charging facilities. Given the operational characteristics of the site, during the shift changeover, there will be double the anticipated number of workers on site as workers starting their shifts arrive prior to staff leaving site. As such, the proposed level of car parking provision is deemed appropriate.
- 7.28 We also consider the proposed provision of EV charging spaces as positively contributing towards promoting and enabling travel by electric and other Ultra-Low Emission vehicles.



#### Van Storage

- 7.29 Due to operational requirements, the proposed development includes an area of van storage, which is located to the north of the warehouse building in a four-tier storage deck. The deck includes 512 no. storage spaces with 84 no. electric charging provision with the remaining van storage spaces fitted with passive EV provision in order that they can be activated to meet the increasing requirements of the occupier.
- 7.30 The proposal also includes 48 no. van launch bays to the south of the van storage deck. The launch bays will not be used for storage overnight and as such there will be a total of up to 512 no. vans on the Site at any one time.

#### Cycle Parking

- 7.31 The proposed development seeks to deliver 40 no. secure, covered cycle parking spaces located towards the main pedestrian entrance of the development and is therefore in compliance with the cycle parking standards within the Parking Standards SPD.

#### Energy and Sustainability

- 7.32 An Energy and Sustainability Statement has been prepared by Kelly Taylor Associates which has been produced to show compliance with Local Plan Policy ECC SP2, in addition to Criteria 1 (CO<sup>2</sup> emissions) & Criteria 3 (Limiting solar gains) of the Building Regulations Part L2A-2013. A provisional energy performance certificate has also been produced to give the likely asset rating of the building after fit-out is completed.
- 7.33 The statement sets out the scheme has been designed to incorporate low and zero carbon energy sources which will reduce the predicted CO<sup>2</sup> emissions of the development by 10%. Renewable/low carbon energy sources have been considered and a photovoltaic system on the roof of the warehouse is proposed. The Statement therefore demonstrates the energy and climate change mitigation measure proposed are in accordance with the requirements of the Local Plan.

#### Flood Risk and Drainage

- 7.34 The Environment Agency's online Flood Risk Map identifies the Site is predominantly located within Flood Zone 2 with small sections of the Site located in Flood Zone 3.
- 7.35 Accordingly, a Flood Risk Assessment has been prepared by Delta Simons and submitted in support of this planning application. The Flood Risk Assessment identifies the main potential source of flooding to the Site is fluvial and combined fluvial and tidal flooding, and the baseline flood risk from all other sources of flooding are considered Low. Fluvial risk at the Site is attributed to the Oldlands Farm Ditch and combined flood risk is derived from tidal and fluvial interactions between



the on-site land drains and Lidsey Rife to the east of the Site. The baseline fluvial / tidal flood risk at the Site is assessed to be Moderate to High.

7.36 The identified flood risk within the FRA is set to be mitigated by raising ground levels to between 2.5 m to 4.0 m AOD. Finished Floor Levels of the proposed unit are to be set at 3.65 m AOD approximately 2.05 m above the maximum flood level expected during the + 35% CC event and 1.94 above the +45% CC event. To ensure land raising does not increase flood risk elsewhere, it is proposed to provide level-for-level floodplain compensation within a parcel of land to the north west of the Site for the 1% AEP + 35% CC event. A high-level assessment of the proposed FCS area indicates that this is feasible for this scheme. A culvert assessment indicates that there is sufficient capacity within Oldland Farm Ditch box culvert to pass flows during the 1% AEP event. Consequently, the proposed mitigation measures will reduce the fluvial / tidal risk at the Site and the impact of the development elsewhere to Low.

7.37 The FRA states surface water risk will be managed with a surface water management scheme, which is designed to restrict flows to the greenfield rate and attenuate storms up to the 1 in 100 year + 40% CC event. Overall, the impact of the development on surface water risk and all other sources of risk is considered Low.

7.38 A Surface Water Drainage Statement has also been prepared by Eireng. The Statement demonstrates the proposed development would be operated with minimal risk from flooding with the proposed mitigation measures and would not increase flood risk elsewhere.

7.39 Proposed surface water flows will be discharged to the adjacent watercourses via hydrobrakes or similar subject to agreement with West Sussex Council. The proposed surface water discharge rate

7.40 and volume will be in accordance with greenfield run-off. Foul discharge to Southern Water's system will be subject to their requirements and available capacity.

7.41 The on-site treatment and pollution prevention measures with the provision of oil separators, permeable paving and catchpit inspection chambers/manholes, will provide adequate stages of treatment prior to discharge to the receiving watercourse.

7.42 The proposed development will therefore considered in accordance with the development plan policies related to flood risk and drainage.

#### Landscaping

7.43 In terms of landscaping, a detailed Landscape Strategy Plan prepared by Delta Simons has been submitted with the planning application. The submitted drawings show high quality infrastructure



and hard landscaping within the red line, in addition to areas of soft landscaping around the perimeter of the warehouse.

- 7.44 The Landscape Strategy and Landscape Planting Plan demonstrates that alongside the proposed development, the proposed planting scheme provides a range of native tree and shrub planting, including 240 no. trees together with meadow grasslands and areas with marginal seed mixes which shall contribute to enhancing the visual quality of the site and its ecological value.
- 7.45 The proposed landscaping design for the proposed amended route of the public right of way, which includes meadow grasslands, native shrub and tree planting, shall contribute to enhancing the users experience and enjoyment of this part of the route.
- 7.46 With regards to the existing TPO trees in the centre of the site, the landscaping scheme has considered its relationship with the proposed development and confirmed the details related to the tree protection fencing. Additional tree planting is also proposed between the TPO trees alongside providing marginal seed mixes so to promote an enhancement of landscape features in this location.
- 7.47 The accompanying management plan with the Landscaping Strategy also sets out the proposed management of the Site's landscaping to ensure its suitably maintained so to retain a high quality visual appearance and to allow planting/trees to mature accordingly.
- 7.48 A Landscape and Visual Impact Assessment (LVIA) has also been submitted in support of this application, which defines the existing landscape conditions, assesses the character and quality of the landscape and analyses the visual and landscape effects of the proposals.
- 7.49 The main landscape and visual impact associated with the proposals are considered to be the visual impact on users of the public highways, public rights of way, and on nearby residential areas, and the character and appearance of the landscape. As such, the visual impact assessment of the proposed development is based upon an analysis of the Zone of Theoretical Visibility (ZTV) bare earth of the principal features of the scheme and on the individual impact assessment upon the 19 identified viewpoints being considered the appropriate locations for the assessment.
- 7.50 The LVIA identifies eleven impacts that are Significant at Year 1 comprise of Viewpoints 1, 2, 3, 4, 5, 6, 7, 8, 11, 18 and 19 as a result of the sensitivity of the receptors and their close proximity to the proposed development. Of these eleven impacts only three will remain Significant at Year 15 and comprise of Viewpoints 1, 2 and 11. Viewpoints 1 and 2 are located on the diverted Public Right of Way that runs through the site and that will have direct views over the new multi-storey car park.



Viewpoint 11 is located on the A259 Felpham Relief Road flyover footpath that will have elevated views over the proposed development.

7.51 The LVIA sets out a comprehensive and robust landscape mitigation strategy is proposed along the proposed sites boundaries that will mitigate the development from the Public Rights of Way to the east (Viewpoints 3, 4, 5, 6, 7 and 8) thus their impacts will change from Significant to Not Significant at Year 15 after the mitigation strategy matures. The remaining two Viewpoints 18 and 19 are from the footpath alongside the access road and from the adjoining Lidl car park. In both cases after the mitigation strategy matures at Year 15 their significance will change to Not Significant. All other viewpoints will have a Not Significant impact due to intervening vegetation within the wider landscape or the distance away from the proposed Site.

7.52 The LVIA concludes that the landscape can absorb the proposed development and that the proposals have been carefully designed so that they can be integrated into the setting of the local landscape character. It, therefore is considered to be Moderate magnitude of change with a Moderate/ Minor Effect and Not Significant on completion of the development.

7.53 We therefore consider the proposed landscaping scheme and overall landscape visual impact to be appropriate and in accordance with Local Plan Policy D SP1.

#### Biodiversity and Trees

7.54 Whilst the Site itself is not subject to any statutory or non-statutory ecological/nature conservation designations, the local area is semi rural in nature and the land to the east of the Site, beyond the railway line, is an allocated Biodiversity Corridor. Accordingly, a Preliminary Ecological Appraisal prepared by Delta Simons has been submitted with the application.

7.55 The findings of the initial Site assessment have identified habitat or potential for breeding birds, reptiles, roosting and foraging bats, badger, and water voles. As such, surveys to identify the species present, and their associated distribution and densities, are recommended to inform the development proposals. The appraisal recommends a number of construction and operation phase protection measures which have been included within the Construction Management Plan. A number of site enhancements are also proposed and is reflected within the landscaping scheme. The planting has been designed to enhance retained vegetation and be of native species, or those of known value to wildlife, sourced from local nurseries to enhance foraging opportunities for local birds and bats, by increasing the invertebrate diversity on-Site. Also, where trees are proposed to be planted, a functional understorey has been included.



- 7.56 An Arboricultural Survey has been submitted in support of this application (prepared by Delta Simons). The report assessed a total of 7 no. trees and 2 no. tree groups, and it is identified that 5 no. trees are covered by Tree Preservation Orders (TPOs) (LPA ref TPO/BE/2/19). The survey identifies that on-Site, there are a number of individual trees and a tree group that could be impacted by any proposed development. Trees T001 to 007 (totalling 7 no trees) and tree group G006 were also assessed as having Bat Roost Potential.
- 7.57 To ensure that the root areas and canopy extremities of the individual trees and the tree groups that may be retained are not damaged, a Constraints Plan has been prepared to show the locations where the recommended protective fencing should be erected for any trees selected for retention.
- 7.58 Furthermore, Delta Simons have also produced an Arboricultural Impact Assessment and an Arboricultural Method Statement for Enabling and Construction Phases of Work. The two reports set out the proposed measures of protection for the existing trees on site and propose mitigation measures in order to ensure no detrimental harm of these existing site features.

#### Noise Impact

- 7.59 The closest existing residential properties to the proposed development lie approximately 250 metres to the north. The Site forms part of an established industrial area and the Noise Impact Assessment submitted with the application (prepared by TetraTech) demonstrates the maximum noise levels assessed for proposed building services plant are predicted to result in a noise rating level which would be at least 10 dB below the existing background noise level during the worst-case night-time period at the closest sensitive receptor locations. Accordingly, the assessment concludes the building services plant is expected to have no adverse impact at the closest sensitive receptors.
- 7.60 With regards to operational noise levels during the daytime and night-time periods, the assessment concludes these are predicted to be below the guideline noise intrusion criteria at nearby properties assuming both a windows-open and a windows-closed scenario. Therefore, operational noise levels are considered to be within the No Observed Adverse Effect Level and as such, the proposed development site is not expected to have a significant adverse impact on health or quality of life.
- 7.61 The results of the aforementioned assessments demonstrate the proposed development is not expected to adversely affect nearby properties and the proposed development is therefore in compliance with Local Plan Policy QE DM3 (Air Pollution).



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#### Air Quality

- 7.62 The proposals involve the use of a fleet of delivery vans to be managed by the operator, which would comprise more modern, efficient, well-maintained vehicles. This would result in environmental benefits particularly to air quality.
- 7.63 As set out within TetreTech's Air Quality Assessment, the construction phase of the development has the potential for fugitive dust emissions from site activities, such as earthworks, construction and track out – these also take into account exhaust emissions from additional road traffic generated due to the proposed development. Consequently, during the construction phase, site specific mitigation measures detailed within the assessment will be implemented. With these mitigation measures in place, the effects from the construction phase are not predicted to be significant.
- 7.64 With regards to the operational phase of the development, we highlight active EV charging points are proposed for some of the van storage spaces (with the remaining being passive spaces) as the operator is aiming to make its operations more sustainable and to this end it is seeking to maximise the number of electric vehicles serving the proposed last mile distribution facility. The assessment undertook detailed dispersion modelling of traffic pollutants for the proposed development, using operational year assessment for 2022 traffic emissions to assess the effects of the proposed development – these also take into account exhaust emissions from additional road traffic generated due to the proposed development. The findings identify the long-term (annual) assessment of the effects associated with the proposed development with respect to Nitrogen Dioxide (NO<sub>2</sub>) is determined to be 'negligible'. With respect to PM<sub>10</sub> and PM<sub>2.5</sub> exposure, the effect is determined to be 'negligible' at all identified existing sensitive receptor locations.
- 7.65 The proposed development is therefore considered not to have a detrimental impact on air quality and is in compliance with Local Plan Policy QE DM3 (Air Pollution).

#### Lighting

- 7.66 A drawing of the proposed lighting scheme prepared by Kelly Taylor Associates, showing the details of the proposed lighting infrastructure and the associated lux levels, has been submitted with the application. The accompanying external lighting strategy report also sets out how the lighting scheme has been designed to consider best practice for lighting design principles, in addition to taking into account the ecological receptors on and adjacent to the Site, in addition to local residents.



#### Contamination

- 7.67 In accordance with Local Plan Policy QE DM4 (Contaminated land) a Land Contamination Assessment has been submitted in support of this application (prepared by Delta Simons). The Assessment identifies widespread contamination is considered unlikely and the preliminary risk assessment has identified a Low risk of soil/groundwater contamination and hazardous ground gas at the Site
- 7.68 The Assessment has concluded recommending no further ground investigation is considered necessary in relation to addressing the potential impacts associated with contamination. A watching brief is recommended during construction works for unanticipated contamination.
- 7.69 In light of the above matters, the proposed development is considered to comply with Local Plan Policy QE DM4 (Contaminated land).

#### Archaeology

- 7.70 In recognition of the Site's greenfield status and relatively significant amounts of archaeological investigation in the local area, an Archaeological Desk Based Assessment has been submitted with the application.
- 7.71 The report has collated the results of previous work at the site and within the immediate area and has concluded a high archaeological potential at the site for the Bronze Age and Iron Age periods, as well as for Roman/Saxon/Medieval agricultural activity. A moderate potential is considered for the Neolithic period. A low potential has been considered for all other past periods of human activity. If remains were present at the site, these have been considered most likely to be of local or perhaps regional significance.
- 7.72 The report concludes, noting the results of previous archaeological work in the immediate area would suggest that survival of remains is likely to be good and any further archaeological work is likely to be justified. At the time of writing RPS are in liaison with the County Archaeologists to discuss a proportionate scope for a Written Scheme of Investigation which will be submitted to the Local Planning Authority in due course.
- 7.73 In light of the above matters and willingness to undertake further analysis, the proposed development is considered to comply with Local Plan Policy HER DM6 (Sites of Archaeological Interest).



#### Construction Management

7.74 A Construction Management Plan ('CMP') has been submitted with the application (prepared by ISG). The CMP sets out the proposed management measures related to considerations including noise and vibration, dust, transport and highways, biodiversity and waste management – including mitigation measures where required.

7.75 We therefore consider the plan provides an appropriate level of detail related to the management of the construction phase so to ensure no detrimental impact on the local highway network in this area and also to protect the amenity of the immediate area.

#### **Summary of Planning Benefits**

7.76 As set out in this Planning Statement the proposed development is considered to provide a significant number of planning benefits to the local community both in Bognor Regis and the wider region. Further details of the benefits are set out within the corresponding technical assessment work, however are summarised as follows:

- The build to suit facility and associated operational van storage deck are to meet the specific requirements of an end user who are keen to be operational on site as soon as possible. To this end we are seeking to avoid any pre-commencement conditions being imposed on the permission to enable a swift start on site to meet their ambitious timescales to be on site.
- The redevelopment of land at Oldlands Farm represents the delivery of a strategic scale site allocated in the Development Plan which continues the recent successful development of the Oldlands Farm site.
- The Site forms part of Enterprise Bognor Regis and is a location being actively supported for employment development by the Local Planning Authority.
- The development will generate a significant number of local jobs both during construction and once operational. There will be further indirect economic growth through the increased use of facilities in Bognor Regis generated by the increased number of people visiting the centre.
- All works on the Site will be carried out in accordance with the recommendations of the Ecological Appraisal submitted with the application to avoid inadvertent damage to habitats on, or surrounding, the Site. This includes measures to protect nesting birds,

reptiles, bats and other species. Furthermore, ecological enhancements are proposed to support wildlife.

- The development provides a significant amount of landscaping to strengthen and enhance biodiversity, in addition to ensuring that trees subject of TPOs are protected during construction and operation of the Site. Full details are shown on the landscaping plan submitted.
- The development incorporates measures to produce 13.5% of the total predicted energy requirements from renewable or low carbon energy generation (compared to Part L 2013 building emission rate). This is achieved by the proposals including an array of photovoltaic panels generating 60kWP of energy.
- The Travel Plan submitted sets out initiatives and measures to reduce single-occupancy car travel and increase travel by more sustainable modes including cycling and walking.
- A significant amount of car parking spaces and operational van storage spaces will be for electric vehicles, with passive provision for additional spaces to allow for further electric vehicle charging in the future.
- The lighting proposed is carefully designed to prevent impacts on residential amenity and road users of the A259. The lighting has been designed to minimise impacts on bats and has been confirmed as acceptable by the project Ecologist.



## 8.0 CONCLUSION

- 8.1 The Site is located within the Oldlands Farm employment area on the north edge of the Bognor Regis and comprises arable/pastoral farmland with hedgerows and matures trees. The Site forms part of Enterprise Bognor Regis and is a location being actively supported for employment development by the Local Planning Authority.
- 8.2 The proposals, the subject of this planning application, seek the development of a warehouse (Use Class B8) with ancillary office, associated vehicle parking, van storage, plant, ancillary structures, lighting landscaping and infrastructure works. The proposed development will provide much needed industrial floorspace that will create local employment opportunities and reinforce the status of Oldlands Farm and the A259 corridor as an employment location.
- 8.3 The technical assessments prepared and submitted with this planning application demonstrate that the development does not cause any unacceptable adverse impacts with regards to design and local character, heritage assets, sustainability and carbon reduction, flood risk and drainage, landscape and biodiversity, transport, noise impact or air quality.
- 8.4 Taking into account the above, and weighing up the planning balance, it is considered that the benefits of the proposed development are considerable. The development is considered to comply with the Development Plan as a whole and there are no material considerations that indicate planning permission should not be granted due to unacceptable adverse impacts as a result of the proposed development.
- 8.5 All key planning considerations have been taken into account in the preparation of the development proposals, which comply with national and local Development Plan policies, and therefore warrants support from the Local Planning Authority.

