

*Established in 2007, the Board is an independent, non-profit organisation.
www.bognorregisregenerationboard.com
Chairman: Raof Daud*

Planning
Arun District Council
Town Hall
Clarence Road
West Sussex
PO21 1LD

By Email: planning@arun.gov.uk; claire.potts@arun.gov.uk

11th November 2021

Dear Sirs,

Re: AL/87/21/PL

Oldlands Farm Newlands Road Bognor Regis PO22 9FJ

SUBSTITUTE PLANS - 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.

In preparing its response to this application the Board has taken into consideration both the strategic development vision and policies as outlined in the Arun Local Plan 2011-2031 and the Aldingbourne Neighbourhood Development Plan. The Board endorses and promotes the established town values for Bognor Regis, as follows:

BOLD - A beacon for a bold future
INNOVATIVE - Blue sky thinking
FUN - Ready for fun

In line with the UK Government's Net Zero Carbon (NZC) policy and target to reduce CO2 emissions by 78% by 2035, we would urge Arun District Council to include the adoption of the BREEAM [Building Research Establishment Environmental Assessment Method - <https://www.breeam.com/>] in its development policies across the Arun Local Plan area, with a commitment to establishing Design Codes for each major development scheme that incorporate minimum BREEAM targets.

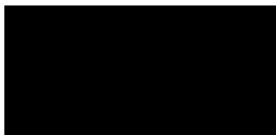
The proposed development is located within the Oldlands Farm site, identified as Site 3 within the Local Plan Strategic Employment Land allocation of Enterprise Bognor Regis. The Board notes the applicant's submission of substitute plans and supporting information and we welcome the opportunity, given by ADC, to examine these in detail and respond. Following careful examination of the documents and **in addition** to the response submitted by the Board on 21st July 2021 (appended herewith), we would comment as follows:

- The revised ecological appraisal, with its indication of an 11% biodiversity net gain in line with emerging legislative requirements (The Environment Act 2021), is noted.

- The Transport Assessment (TA) has not been revised by the applicant to address the concerns raised by the Board in our original comments, being the same as submitted in June 2021. Furthermore, we would highlight that the proposed trip generation and distribution forecasts are based on projections made for a previously consented development on the same site (see lapsed application AL/58/15/OUT) with those reports dated 2015 and using data from as far back as 2007. We would suggest that the age of this dataset, the commercial and residential developments both delivered and consented in proximity to the site over the past 10-15 years and the lived experience in travelling the roads within the vicinity would indicate the forecasts made in the TA dated September 2021 do not properly reflect the current or future use of the road network within this location. Whilst the consultants' comments regarding pandemic restrictions on traffic surveys are noted, we would strongly suggest that further 'real time' information from the applicant, including new traffic surveys to evaluate actual current usage, is required to accurately assess the application's potential impact prior to determination.
- The Board notes the National Highways (formerly Highways England) recommendation that the application should not be determined pending further information from the applicant in relation to the potential impact on the strategic road network.
- The Board notes the objection comments raised by Bersted Parish Council and specifically, their concerns regarding class of use, traffic and drainage.

Whilst, in summary, the Board offers no objection to the proposal, we are disappointed that the applicant has not taken the opportunity to respond to the concerns raised against the original submission, by ourselves and others, through demonstrating greater ambition and commitment, beyond the required minimum, in these substitute plans. Thank you for taking the time to consider the Board's representations.

Yours sincerely,



Rebecca White
Advisor
Bognor Regis Regeneration Board

BACKGROUND NOTE

The Bognor Regis Regeneration Board is a unique private and public partnership established in 2007, working with and for the wider Bognor Regis area. It brings together leading representatives from the key public, private and community stakeholders in the town.

The Board has three overarching key objectives:

1. To collectively promote Bognor Regis as a great place to live, work, study, visit, invest and enjoy.
2. To consider, give opinion and comment upon how and to what extent planned and proposed developments contribute to:
 - the town's growth and development;

- addressing and overcoming the town's socio-economic challenges; and,
 - maximising benefits and opportunities for the town.
3. To consider and evaluate strategies which impact upon the economic growth of Bognor Regis and offer comment, opinion and where appropriate modifications.

In 2019, the Board re-examined its objectives to focus on improvement and regeneration of the Bognor Regis town centre, widen the Board's membership and ensure its long term financial sustainability. The Board is independent and not a part of, or a subsidiary body of, any organisation or agency.