



Ms N Russell
Mango Planning and Development
Number One Waterton Park
CF31 3PH

CF31 3PH

Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex BN17 5LF
Planning General Enquiries
Tel: (01903) 737756 Fax: (01903) 730442
Dx: 57406 Littlehampton
Minicom: 01903 732765
e-mail: planning@arun.gov.uk
website: www.arun.gov.uk/planning

Your Ref:

Our Ref: PAA/33/17/

Please ask for: Claire Potts

01903 737698

13 April 2017

Dear Ms N Russell

Pre-Application Advice

Employment Units, warehouse and office space, with hotel.

Saltbox Site Off Rowan Way Bognor Regis

I write regarding the above matter and your enquiry received on 9th February 2017.

Description Of Proposed Development

From the details submitted, I understand that you propose to develop the site known as 'Salt Box', Bognor Regis for a two phase scheme for employment uses. Phase 1 would comprise two units totalling 14,850 m2 GIA. Unit 1 would be warehouse with processing, packaging and dispatch and offices at 2nd and 3rd floor. Unit 2 would be warehouse and offices. Phase 2 would include an extension to Unit 1, 19x B1/B8 units, an A3 unit (a hotel is also being considered) and a production unit. The proposal would include a buffer zone to the Local Natural Reserve and village to the north of the site. Access would be from the A259/A29 roundabout with potential for a future access to the caravan park site to the south which is also part of the employment allocation.

Description Of Site

The site comprises agricultural land. The site is generally flat and 17.37 acres in size. The site boundaries have hedgerows interspersed with trees.

Description Of Locality

To the north of the site lies the village of Shripney which has a Conservation Area. To the east is the Oldlands Farm employment site which been partly developed by Rolls Royce and has permission for additional employment uses on Phase 1 to the front of the site, including 2 car showrooms, a bulky goods retail unit and B8 trade counter warehouses. To the south is a caravan site and to the south east, the Bersted Brooks Local Nature Reserve.

Planning Issues

The following issues have been identified for consideration.

Principle

decpaa

Design
 Highways, Transport and Parking
 Sustainability
 Sustainable Construction
 Flooding/Drainage
 Conservation Area
 Light Pollution
 Noise Pollution
 Contamination
 Infrastructure Provision
 Biodiversity
 Protected Species
 Sites of Nature Conservation Importance
 Crime
 Loss of Agricultural Land
 Landscape Impact
 Archaeology

Relevant Planning History

Relevant Policies - the following policies are considered relevant to your proposal:

Arun District Local Plan:	AREA10	Strategic Gaps
	AREA15	Sites of Local Importance for Nature Conservation
	GEN11	Inland Flooding
	GEN12	Parking in New Development
	GEN14	Public Transport
	GEN15	Cycling and Walking
	GEN18	Crime Prevention
	GEN2	Built-up Area Boundary
	GEN23	The Water Environment
	GEN25	Water Resources
	GEN26	Water Quality
	GEN32	Noise Pollution
	GEN33	Light Pollution
	GEN34	Air Pollution
	GEN6	Amount of New Commercial Development
	GEN7	The Form of New Development
	GEN8	Development and the Provision of Infrastructure
	GEN9	Foul and Surface Water Drainage
	NEBEEES2	Bersted Neighbourhood Plan 2014 Policy ES2
	NEBEEE6	Bersted Neighbourhood Plan 2014 Policy EE6
	NEBEEES7	Bersted Neighbourhood Plan 2014 Policy ES7
	NEBEGA1	Bersted Neighbourhood Plan 2014 Policy GA1
	NEBEHDQ8	Bersted Neighbourhood Plan 2014 Policy HDQ8
	EDDM1	D DM1 Aspects of Form and Design Quality
	EECCSP1	ECC SP1 Adapting to Climate Change
	EECCSP2	ECC SP2 Energy and climate change mitigation
	EEMPDM1	EMP DM1 Employment land:Development Management
	EEMPDM2	EMP DM2 Enterprise Bognor Regis
	EEMPSP1	EMP SP1 Employment land provision
	EEMPSP2	EMP SP Strategic employment land allocations
	EENVDM1	ENV DM1 Designated Sites of Biodiversity or Geological Imp
	EENVDM5	ENV DM5 Development and Biodiversity

decpaa

EENVSP1	ENV SP1 Natural Environment
EHEDM3	HER DM3 Conservation Areas
EINFSP1	INF SP1 Infrastructure provision and implementation
ELANDM1	LAN DM1 Protection of Landscape Character
EQEDM1	QE DM1 Noise Pollution
EQEDM2	QE DM2 Light Pollution
EQEDM3	QE DM3 Air Pollution
EQESP1	QE SP1 Quality of the Environment
ESDSP1	SD SP1 Sustainable Development
ESKILLSSP1	SKILLS SP1 Employment and Skills
ESODM1	SO DM1 Soils
ETDM1	T DM1 Sustainable Travel and Public Rights of Way
ETOUDM1	TOU DM1 Tourism Related Development
ETSP1	T SP1 Transport and Development
EWDM1	W DM1 Water Supply & Quality
EWDM2	W DM2 Flood Risk
EWDM3	W DM3 Sustainable Urban Drainage Systems
EWSP1	W SP1 Water
NPPG	National Planning Practice Guidance

Planning policy guidance NPPF National Planning Policy Framework

Principle

The site lies in a countryside location outside the Built-up boundary (Arun Local Plan 2003 and Bersted Neighbourhood Plan 2014) where the principle of development is considered unacceptable. Development Plan policies seek to exert a strict control over new development in the countryside to protect it for its own sake. Development will only be permitted in exceptional circumstances or where there is a strong justification for a countryside location. The Government's planning advice indicates that planning authorities should continue to ensure that the quality and character of the wider countryside is protected, and where possible enhanced.

However, the site is identified in the emerging Local Plan (2014) as part of the Enterprise Bognor Regis strategic employment land allocation. The proposed modifications to the emerging Local Plan have recently been approved by Arun District Council and the Salt Box site continues to be an important part of the Enterprise Bognor Regis area which it is anticipated would be delivered in two phases, with Phase 1 2015 - 2019 and Phase 2 2020 - 2024.

The site is also part of the draft Enterprise Bognor Regis Local Development Order which was prepared in 2015 on the basis of the draft Policy EMP DM2 of but has not been 'made'. Whilst not having Local Development Order status, the draft provides an indication on the type of uses anticipated to be delivered on the site, as well as providing background evidence on the site and key constraints. The LDO would have created a 'permitted development' planning environment for proposals in the following use classes: Use Class B1 (office, light industry, research and development), B2 (general industrial) and B8 (storage and distribution). An element of complementary uses for retail and services (Class A) and assembly and leisure (Class D2) would have been included to support the principal employment uses and to create and sustain an attractive location for business. The draft LDO would be a material consideration in determining any applications on the site.

The modifications to the emerging Local Plan provide an indicative gross floorspace of 25,130 sqm for the Salt Box site and an indicative Use Class of B1/B2. The draft Policy EMP DM2 states that a mix of B1, B2 and B8 uses will be supported provided that certain issues are addressed.

decpaa

These are set out in the relevant sections below. Until adopted the emerging Local Plan can only be given very limited weight and taken into account as a material consideration, therefore until the emerging Plan is adopted the principal of employment development at the site is not firmly established.

The presumption in favour of sustainable development in the NPPF would also be material consideration, and as the Arun Local Plan (2003) only (through Policy GEN6) provided for employment floorspace up to 2011, the relevant policies can be considered to be out-of-date, including GEN 2 (Built up area boundary) and GEN3 (Protection of the Countryside). This means that the presumption in favour of sustainable development would be taken into account in decision making. In relation to this proposal, the scheme would contribute to building a strong, responsive and competitive economy. The NPPF also states that significant weight should be placed on the need to support economic growth through the planning system (paragraph 19). This needs to be balanced in any decision with the social and environmental aspects of sustainable development, including social and environmental considerations. The current status of the site as countryside outside the built-up area boundary in the Neighbourhood Plan needs to be accorded weight in line with paragraph 198 of the NPPF. When the emerging Local Plan is adopted there will be a conflict between the Local Plan and the Neighbourhood Plan (NP). The National Planning Policy Guidance (NPPG) states that the decision maker should favour the policy that is contained in the most recent document to become part of the development plan. The NPPG also states that a NP should not be used to constrain the delivery of a strategic site allocated for development in the Local Plan. However, these arguments will only come into play once the Local Plan has been adopted.

Design

Planning Policies and Central Government Advice support the efficient and effective use of land. Policy GEN7(i) requires new developments to respond positively to the identified characteristics of a particular site to create developments which respect local characteristics. Central Government Advice further indicates that more intensive development is not always appropriate and that design which is inappropriate in its context should not be accepted. Furthermore new development should be well integrated with and complement the local area in terms of, for example, layout.

Emerging Policy EMP DM2 (f) refers to a high standard of design and landscaping to maximise the 'gateway' location of the site. The policy also requires a overarching masterplan for each site to be developed in conjunction with the Council, ideally this should be agreed before submission of an application. For the Salt Box site this should show how the site works in conjunction with 'Site 2' Rowan Caravan Park. The draft LDO includes general development parameters which provide guidance on primary and secondary road dimensions and building scale (particularly maximum heights - of 9m and 13.5m depending on location within the site). Plan 2 of the draft LDO includes a Zoning Plan which illustrates a 'gateway zone'. Based on the plans submitted, the arrangement of smaller B1/B8 units does not address the 'gateway' location. A detailed Design Guidance document was also prepared as part of the draft LDO and this provides an indication of the high quality design and landscaping standards that are expected on this important gateway site. A design and access statement should be submitted with the application in order to demonstrate how it meets the high quality design aspirations.

Neighbour Amenity

Arun District local Plan Policy GEN7 indicates planning permission will only be granted for schemes displaying high quality design and layout. It further indicates development will be permitted if it takes into account impact on adjoining occupiers, land, use or property. The NPPF further indicates that good design should contribute positively to making places better for people. The main consideration for this site is the potential visual and disturbance impact on Shripney to the north (conservation area and listed buildings considered below). The buffer area shown on the plans (to the north of Unit 2) reflects the 'Shripney Village buffer zone' that was identified in the

draft LDO and this is important as it maintains a sense of separation between the employment zone and the village (including the setting of its conservation area). Provided that this buffer zone is maintained, the visual impact on the village could be mitigated.

Highways Transport And Parking

Planning policies allow for the safe movement of pedestrians and vehicles, giving priority to pedestrians, and car parking. Car parking requirements will vary according to accessibility of the site to public transport or services, or location within a town centre. Some Guidance is provided within Appendix 2 Parking Standards of the Arun District Local Plan. A separate pre-application advice service is provided by West Sussex County Council as the Local Highway Authority. The amount of parking and impact on the highway will be dependant on the mix of uses proposed. Provision should be made for the safe movement of pedestrians around the site through footways, crossing points and the use of different materials to demarcate the pedestrian routes. Policy EMP DM2 of the emerging Local Plan requires the suitable upgrading and provision of access and/or junctions to the A29/A259 and Rowan Way as appropriate, along with a Transport Assessment.

Sustainability

Government Planning policy is to encourage appropriate development in a location that will enable a reduction in the need to travel, particularly by private car and that planning should contribute to reduce emissions and reduce climatic change. Policy EMP DM2 of the emerging Local Plan requires a Travel Plan is submitted to demonstrate how the impacts of development can be mitigated and to improve a modal shift towards an increase in sustainable transport.

Sustainable Construction

Sustainable Construction

Tackling climatic change is a key government priority for the planning system. Applicants for planning permission should consider how well their proposals for development contribute to the Governments ambition of a low carbon economy and how well adapted they are for expected effects of climatic change. Applicants should consider provision of renewable energy in the form high level insulation, rainwater harvesting a general minimal energy use, including Carbon Dioxide reduction.

Flooding

The NPPF requires development not to give rise to an unacceptable risk of flooding detrimental to human health or property. There are requirements regarding the submission of a Flood Risk Assessment and Sequential test documentation. The relevant requirements for these are dependent upon the designated flood zone that the site is located within. The Environment Agency website details designated flood zones. Policy EMP DM2 of the emerging Local Plan requires appropriate flood mitigation works. A Flood Risk Assessment was carried out for the draft Local Development Order in 2015. This indicates that the site falls generally from the south-east corner towards the western boundary. The Report also identifies that the Shripney Manor Ditch forms the boundary to the north and most of the west of the Salt Box area of the site to the west of the A29, before flowing into the Aldingbourne Rife to the west of the site. A Flood Risk Assessment would be required to accompany any application and would need to demonstrate how the scheme works in relation to the implemented flood relief scheme at Oldlands.

Conservation Area

In considering whether to grant planning permission with respect to any buildings or other land in a Conservation Area, the Council shall pay special attention to the desirability of preserving or enhancing the character or appearance of that area (Section 72 of the Planning (Listed Buildings and Conservations Areas) Act 1990. The Heritage Assessment carried out to the support the draft LDO provides a useful summary of the main issues and re-iterates the importance of the buffer

zone to maintain a sense of separation between the development and Shripney Village and conservation area.

Light Pollution

Planning policies emphasise the need to consider the impact of light on neighbouring uses and wider landscape, light levels should be the minimum required for security and working purposes, and minimise potential glare and spillage. The required lighting should be designed in order to minimise the effect on the rural character of the local landscape, particularly to the north west and to minimise the impact on local views. Light spill outside the site should be minimised and carefully considered where it is adjacent to the ecology buffers with the aim of having no or very little lighting in these locations.

Environmental Health have commented that site lighting should be positioned/ constructed as not to cause nuisance to neighbours. They have also commented that it may be necessary to provide systems for the control of emissions/ effluvia from production units.

Noise Pollution

The NPPF and development plan policies emphasise that noise sensitive development will not be permitted if its users would be affected by noise by proposed noise generating uses. Emerging Local Plan Policy EMP DM2 includes a clause to ensure that any non-B class uses on the site are of a scale and nature so as not to generate levels of traffic, cause environmental impacts or involve noise sensitive uses that adversely affect the operations of B-Class employment uses on the site.

Environmental Health have commented that a noise impact assessment may be requested depending on the uses to which the warehousing and production units are put. It is noted that the movement of heavy goods vehicles is intended to be restricted to the centre of the site.

Contamination

The NPPF and development plan policies emphasise that development on or close proximity to hazardous sites or contaminated land will be permitted provided the Council is satisfied that appropriate remedial measures can be or have been undertaken in respect of human health and groundwater. Environmental Health have commented that they note no contaminative land issues.

Infrastructure Provision

The Council will seek fair and reasonable contributions to be made by the landowners or developers towards the cost of infrastructure, service or amenity provision, to meet the needs of the occupiers or users of the development. Details of the required County service provision can be found on the West Sussex County website. The proposal is likely to be acceptable subject to the completion of a Section 106 legal agreement.

Biodiversity

The NPPF and development plan policies indicate that developments should aim to maintain and enhance, restore or add to biodiversity and geological resources of the area. An ecological report will need to be submitted setting out the biodiversity present, how biodiversity impacts can be avoided, appropriate mitigation measures and if necessary, compensation measures in the absence of mitigation and how biodiversity gains can be made. All ecological surveys need to be undertaken by a suitably qualified ecologist and at the right time of year and for the right duration. The emerging Local Plan Policy EMP DM2 requires that 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 and particularly protected species. The Habitat and Eco Summary Report carried out in support of the draft LDO provides an indication of the suitability of the site for

suitable habitat for legally protected species including dormice, bats, reptiles, water vole, otter, great crested newts, birds, invertebrates, badgers and other species of principal importance. The Report also suggested mitigation measures.

Site Of Local Importance For Nature Conservation

The NPPF and development plan policies indicate that a development likely to have an adverse effect, either directly or indirectly on a Local Nature reserve and Site of Nature Conservation importance such as ancient woodlands or wildlife corridors will not be permitted. The proposed site is located close to the Bersted Brooks Local Nature Reserve. The proposed scheme includes a LNR Buffer Zone to the south western corner of the site which was an area identified in the draft LDO to protect and enhance the LNR.

Crime

Planning policies encourage quality design, layout, landscaping and lighting of new development to help reduce the risk of crime.

Loss Of Agricultural Land

The presence of best and most versatile land (defined as land in grades 1,2 and 3a of the Agricultural Land Classification), should be taken into account alongside other sustainability considerations when determining planning applications.

Landscape

Planning policies and Central Government advice emphasise that the conservation of the natural beauty of the landscape and countryside should therefore be given great weight in development control decisions. The Landscape and Visual Impact Assessment carried out for the draft LDO refers to the need to enhancing hedgerows and increasing species diversity along the southern and western boundaries. Native tree planting along the western boundary would soften the effects of the development in views from the west and north west. The Report sets out that the 'village buffer' should accommodate planting of native trees and shrubs and grassland areas that will enhance biodiversity, screen development and contribute to the wooded character of this side of Shripney. From the plans submitted it is not clear how much how the village buffer would be managed to achieved these aims. See also comments from Parks and Open Space below.

Archaeology

Archaeological remains are a fragile and finite resource. Permission will not be granted for development that would be harmful to the significant archaeological interest of the site. As the site is over 0.5ha a Historic Environment Record Search needs to be undertaken and provided as part of the planning application submission and any identified heritage assets assessed in order to demonstrate that development would not be harmful to the archaeological interest of the site.

Landscape Comments

The Council's Parks and Open Space/Arboricultural Officers have made the following comments:

As with any new development the proposals must be sympathetic with those existing and the surrounding location. In providing commercial units, warehousing and office space in the location indicated would result in a loss of the important greenspace between the caravan park to the south and the residential dwellings to the north. This native vegetation provides valuable cover and wildlife habitat as well as providing windbreak properties in what otherwise is a very open and exposed location. Any removed vegetation needs to be mitigated for and replaced with a like scheme to existing. The detail of this needs to be provided in plan form so that the extent and proposals can be clearly appraised. The proposals need to include a scheme which includes native species which would be fitting for location.

decpaa

Species choice should provide a lasting and varied scheme that enhances the landscape quality of the site when viewed from its surroundings. It must allow for habitat corridor formation and be proposed for planting at a suitable size so as to minimise the loss of existing, whilst establishing quickly so as to diminish the impact of the proposals within the shortest space of time. Planting density locations and size at time of planting should be shown on the drawing.

The proximity of the proposals to neighbouring boundaries would need to be considered from the point of screening for both those viewing the development and the development looking out as this is a particularly prominent location and a gateway to Bognor Regis. Any trees or vegetation that fall within the proposed or periphery of the development, may provide significant aesthetic impact to the location. Whilst there are no significant trees or planting to the centre of the site there is a grouping to the direct south which would appear to be adversely affected by this scheme. Any trees in particular along the boundaries, which adjoin the site could provide potential valuable screening and should be retained wherever possible. Any considered tree removal from this site should be agreed with Arun District Councils Tree Officer. Root protection Areas (RPA) should extend into the development site and to those neighbouring. Before construction, a tree protection scheme must be in place for any retained trees including trees any whose root protection areas fall within the construction zone from neighbouring land. This should be in accordance with BS 5837:2012 'Trees in relation to construction'

An ecological report detailing biodiversity, habitat and tree survey should be included within the planning application.

With any proposal the provision of open space for workers welfare and buffer zone areas should be considered, confirmation of how this consideration is being catered for should be provided as above.

We would recommend that the above information is submitted for consideration with any application.

Drainage Engineers Comments

The Council's Drainage Engineers have made the following comments:

Any proposed surface water drainage scheme will need to consider the use of sustainable drainage principles (SuDS).

SuDS Selection

The design will need to follow the hierarchy of preference for different types of surface water drainage systems as set out in Approved Document H of the Building Regulations and the Sustainable Urban Drainage System (SUDS) Manual produced by CIRIA. This means that the developer must first consider the discharge of surface water into an infiltration device (eg. soakaway, basin, swale, permeable paving etc) before considering any other method.

Infiltration Drainage Design

Infiltration rates for soakage structures are to be based on percolation tests undertaken in the winter period and at the location and depth of the proposed structures. The percolation tests must be carried out in accordance with BRE 365, CIRIA R156 or a similar approved method and cater for the 1 in 10 year storm between the invert of the entry pipe to the soakaway, and the base of the structure. It must also have provision to ensure that there is capacity in the system to contain below ground level the 1 in 100 year event plus 30% on stored volumes, as an allowance for climate change.

Adequate freeboard must be provided between the base of the soakaway structure and the highest recorded annual groundwater level identified in that location. Any SUDS or soakaway design will need to include adequate groundwater monitoring data to determine the highest winter

decpaa

groundwater table in support of the design. Supplementary guidance notes are also enclosed for information.

Easements will be required for access and maintenance to all watercourses on and adjacent to the site. Maintenance details for SuDS would be required.

Conclusion

Based on the above comments I conclude that were an application for planning permission to be submitted prior to adoption of the Local Plan the scheme would be considered to be contrary to the development plan in that it is outside the built up area boundary identified in Policy ES7 of the Bersted Neighbourhood Plan. However, in determining the application weight would also need to be given to the following material considerations: the draft Local Development Order; the identification of the site as part of Enterprise Bognor Regis in the emerging Local Plan (Policy EMP DM2); and the presumption in favour of sustainable development in the NPPF. This would also be combined with the significant weight that should be placed on the need to support economic growth through the planning system.

When the emerging Local Plan is adopted then Policy EMP DM2 will have full weight and will supersede the built up area boundary restriction in the NP. Therefore, if an application were to be received after the adoption of the Local Plan, it would be considered favourably provided that it meets with the requirements of Policy EMP DM2, addresses the issues considered above and other relevant development plan policies and the NPPF.

Follow Up Meeting

If you require a follow up meeting to discuss this pre-application and advice, you will need to forward a written request together with a fee for £200 made payable to Arun District Council.

Making an Application

If you decide to proceed with making an application you will need to quote the reference number for this advice in the pre-application advice section of the relevant application form. This will ensure that the application receives priority and a speedy validation process.

You will also need to submit the following documentation/information:

Fully completed and signed Application Form with full description of the proposal.
Ownership Certificate and Agricultural Land Declaration
Design and Access Statement
Correct Fee
Location Plan (1:1250)
Site / Block Plan (1:500)
Elevations (Existing and Proposed)
Floor Plans (Existing and Proposed)
Roof Plans

Additionally the following documents will need to be provided:

Please note that the Council has a Local Validation Requirements List and you should refer to it before submitting your application. Failure to provide the required documentation and to complete the Validation Checklist and the Biodiversity Checklist will result in the application being treated as incomplete and delay the validation of the planning application.

Having looked though the Local Validation Requirements List, I would suggest that the following additional documents will be required:

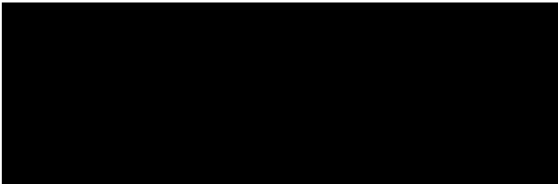
decpaa

Biodiversity Survey and Report
Retail Impact Assessment (if the proposal includes any retail or leisure premises with a floor area of 2500m2 or more)
Flood Risk Assessment
Foul and Surface Water Drainage Statement
Landscaping Strategy
Noise Statement (see Environmental Health Comments)
Bin Storage and Collection Provision
Parking Plan
Planning Application Summary
Street Scene
Structural Survey and Conversion Method Statement
Telecommunications Development Statement
Transport Assessment/ Travel Plan
Tree Survey and Arboricultural Report
Historic Environment Record Search
Heritage Statement

You should be aware that any advice given by the Council in relation to pre-application advice will be based on the case Officer's professional judgement and will not constitute a formal response or decision of the Council with regard to any future planning applications. Any views or opinions expressed are given without prejudice to the consideration by the Council of any formal planning application which will be subject to wider consultation and publicity. Although the case officer may indicate the likely outcome of a formal planning application, no guarantees can or will be given about the decision that will be made on any such application. Any further correspondence will be at the Case Officer's discretion depending on the nature of the further enquiry. It may be necessary to submit a further pre-application advice request. Please note this advice only relates to planning and does not relate to any other legislation which may or may not apply such as Building Regulations. You will need to carry out your own checks to determine whether any other consents or permissions are required.

I trust this is of assistance to you.

Yours sincerely



Neil Crowther
Group Head of Planning