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13th September 2017

Dear Mr Eastham

BE/102/17/OUT: Hybrid Outline application for development of employment units, warehouse, hotel, 2 No. drive-thru units, public house, gym plus engineering works, landscaping & associated works. Land Full application for a Warehouse (class B8), fuel island, car parking, access roads with new entrance from Shripney Road plus engineering works, open space, landscaping & associated works.

Salt Box Field , Land Off Rowan Way, Bersted PO22 9NW

Thank you for your e-mail of 15 August 2017 and the opportunity for CPRE Sussex to comment on the above planning application. This letter constitutes our formal response.

CPRE Sussex works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We encourage appropriate and sustainable land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities.

We have considered the planning policy background and the material supplied with the planning application and have the following comments to make;

1. The application site is in open countryside which is not allocated for development in the adopted Arun Local Plan (2003) or the "made" Bersted Neighbourhood Development Plan (2014) . In both documents, the application site lies outside the built up area in open countryside where development will be strictly controlled, as indicated in policies GEN2 and GEN3 of the Arun Local Plan and policy ES7 and Appendix F of the Neighbourhood Plan. As such, the proposed development is a "departure from the development plan" requiring reference to the Secretary of State to see if the proposal should be called in for his determination after a public inquiry
2. The application site is not just open countryside, worth preserving in its own right, but also serves to maintain an important gap of approximately 350 metres between the wider built up area of Bognor and the settlement of Shripney, which is essential to the latter's character and separate identity. The

We exist to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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application proposals acknowledge this issue by retaining a 80 metre "village buffer" of open land on the north side of the development. However, if the application were granted, this buffer would not be sufficient to maintain the separate identity of Shripney as it would bring Bognor almost up to the village and make it appear to coalesce when seen from many viewpoints. The visual impact of the proposed development will be increased by the proposed buildings on the site, which are mostly large squat boxes surrounded by extensive car parking, both of which are alien to rural character.

If Arun DC are minded to grant planning permission, conditions should be imposed for a comprehensive, well designed, landscaping scheme to soften the appearance of the large buildings on the site and to break up the large expanses of car parking and we request to be consulted on this scheme.

3. These planning policy and visual impact objections have to be weighed against other material considerations, in particular the emerging planning policies of the new Arun Local Plan and the economic benefits which will arise from the businesses and jobs proposed for the site. The new Local Plan was published in 2014 and an examination of it was suspended in February 2016 following concerns about the amount and location of new development in the plan. This led to further work and publication of modifications in April-May 2017. The examination of the new Local Plan will resume later in September 2017. The current position is that the new Local Plan proposes that the application site should be allocated as a strategic employment site for Bognor (policies SP1 EMP and SP2 EMP as modified) which helps meet the area's employment needs, make it more self-contained in employment terms, and reduce out-commuting. The allocation would be supported by proposed investment in land drainage and highway capacity (including links between the site and the Bognor Regis Northern Relief Road). This strategy has yet to be considered and endorsed by the Local Plan Inspector.

4. CPRE Sussex accepts that Arun DC needs to address the local imbalance between population and jobs, and that a more sustainable future for the area is likely to involve allocation of development sites which will attract new, higher skilled and better paid employment. It is also accepted that this might include confirmation of the strategic employment site at the Salt Box.

5. However, the right place to consider this is in the Local Plan now going through examination rather than through a speculative planning application which "jumps the gun" or a Local Development Order, extending permitted development rights for certain employment-related development (as is being promoted by Arun DC) prior to the Inspector's report. Whilst the new Local Plan carries some weight in decisions on planning applications, it does not necessarily outweigh the adopted local and neighbourhood plans and we feel that it would be premature and prejudicial to the Local Plan process to grant planning permission now for such a major development, with significant impacts over a wide area, in advance of the Inspector's report.

6. The application proposal is also contrary to certain policies in the Bersted Neighbourhood Development Plan (2014) as follows and CPRE Sussex echoes the Parish Council's concerns on these matters :

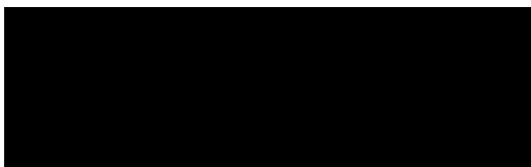
**** Policy EE3 Encouraging a diverse range of employment –** This application does not comply with the policy as far as B8 use is concerned. Appendix G of the Neighbourhood Plan states B2 & B8 is incompatible with the rural/residential areas due to size/number of vehicle movements and the relatively low number/value of jobs being created, which is not the diverse range of industry which should be encouraged.

**** Policy GA3 Traffic calming and shared space – this application does not comply with the policy. This application will cause more traffic on the already congested road network around Rowan Way and the A29 through Shripney. The highway safety of other vehicles using these roads, especially around the Bognor Regis Retail Park and Southern Cross Trading Estate are a major concern, which makes egress from Halfords dangerous and congestion, at times, tails back to Bognor Memorial Hospital roundabout. The application does not provide any mitigation measures to ease congestion. We support the Parish Council's view that a road bypassing Rowan Way from the roundabout at the entrance to the site, through the proposed site to join up with the relief road would mitigate the traffic problems as highlighted above, making the site more attractive to potential businesses wishing to come to this site.**

7. For the reasons set out in paragraphs 1, 2, 5 and 6 above CPRE Sussex objects to this planning application .

We trust these points will be taken into account in determining this application.

Yours sincerely,



Kia Trainor, Director, CPRE Sussex