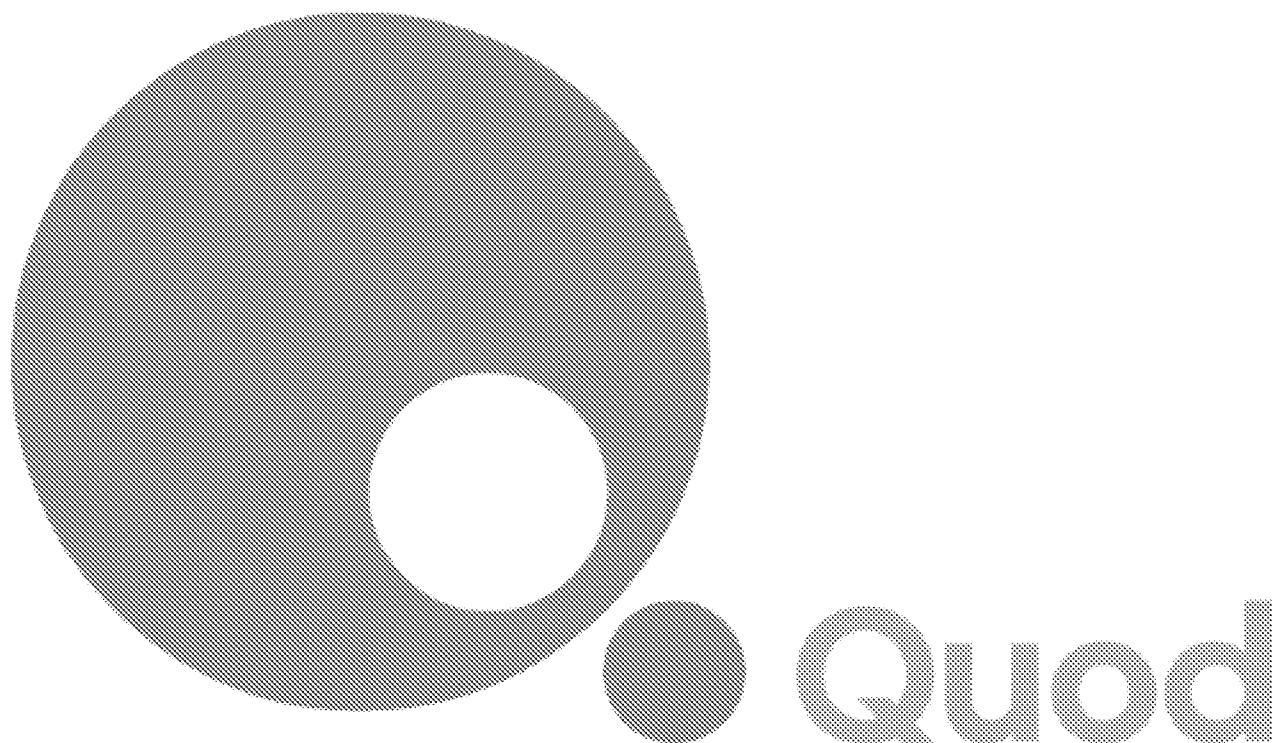




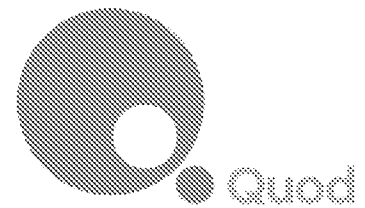
PLANNING STATEMENT

PROPOSED EMPLOYMENT
DEVELOPMENT ON LAND AT
OLDLANDS FARM, SHRIPNEY
ROAD, BOGNOR REGIS, PO22
9NN

ON BEHALF OF BERICOTE
PROPERTIES LIMITED

23 June 2014

Our Ref: Q50031

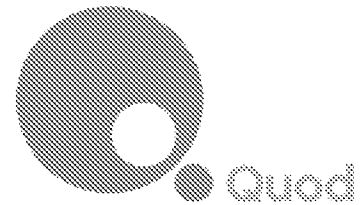


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Documents

1. Site Location Plan (ref: 30699-PL-100)
2. Extant Planning Permission (ADC ref. BE/61/13)
3. EIA Screening Opinion, April 2013



1 INTRODUCTION

- 1.1 This Planning Statement has been prepared by Quod, on behalf of Bericote Properties Limited (The Applicant), in support of a full planning application for a Proposed Employment Development on land at Oldlands Farm, Shripney Road, Bognor Regis, PO22 9NN. Planning permission is specifically sought for the following development:

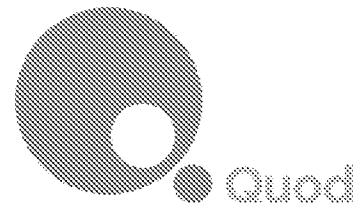
“Erection of 2no. detached industrial/distribution units (B1(c)/B2/B8) including access and servicing arrangements, car parking, landscaping and associated flood compensation area”

- 1.2 This full planning application seeks to redevelop part of the Oldlands Farm site to provide two industrial / distribution units extending to 38,099 square metres gross internal area (GIA). Significantly, the allocated employment site already benefits from outline planning permission for a range of uses including B1(c), B2 and B8, and full planning permission for access to the outline scheme (ADC ref. BE/61/13). The consented scheme covers a larger area than that proposed under this new application, but it is important to highlight that the two schemes are compatible, in part. Whilst all of the land envisaged under Phase 1b and 1c of the outline will be utilised by the current proposals, Phase 1a (the enabling development) is unaffected and remains deliverable. To this end, the compatibility of the two schemes has been assessed in highway and flood risk terms, as we will explain within this Statement.
- 1.3 There are significant and overriding socio-economic benefits arising from the proposals which look to develop over 9 hectares of the Oldlands Farm site, which remains undeveloped despite an allocation dating back over 10 years. The development represents an investment in Bognor Regis of in excess of £70million and has the potential to create between 487 and 1,058 new jobs (HCA Employment Densities, 2nd Edition 2010). Along with Phase 1a of the extant outline permission the two schemes will undoubtedly kick start the long awaited development of Oldlands Farm. This is particularly important for Enterprise Bognor Regis and the associated Local Development Order, which is likely to be in place before the end of 2014.

1.4 It should be highlighted from the outset that the Applicant has positively engaged with Officers in an extended period of pre-application discussions dating back to February 2014. Numerous meetings have been held and Officers have been extremely proactive in an attempt to facilitate the development of the site which is consistent with Arun District Council's pro-growth agenda and long term ambition to improve access to Bognor Regis. As agreed at the outset of those discussions the proposals are supported in principle by the Development Plan and the National Planning Policy Framework (March 2012) (NPPF). Feedback from Officers has been addressed and incorporated within this submission.

1.5 This Planning Statement provides a general description of the Proposed Development and an assessment of the proposals against relevant national and local planning policy guidance. This Statement should be read and considered in conjunction with the following technical reports and supporting documents:

- ✓ Full planning drawings, prepared by MSA Architects;
- ✓ Design and Access Statement, prepared by MSA Architects;
- ✓ Landscape & Visual Impact Assessment, prepared by Davies Landscape Architects;
- ✓ Detailed landscaping drawings, prepared by Davies Landscape Architects;
- ✓ Transport Assessment, prepared by Hydrock;
- ✓ Flood Risk Assessment, prepared by Hydrock;
- ✓ Phase 1 Geo/Environmental and Geotechnical Desk Study, prepared by Hydrock
- ✓ Archaeological and Geophysics data, prepared by CgMS;
- ✓ Extended Phase 1 Habitat Survey, prepared by Tim Moya Associates;
- ✓ Breeding Bird Report, prepared by Tim Moya Associates;
- ✓ Wintering Birds Report, prepared by Tim Moya Associates;
- ✓ Energy Statement, prepared by Tate Consulting;



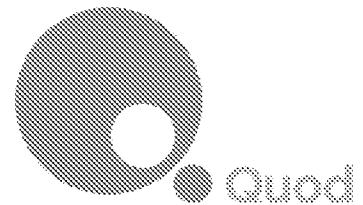
- ✓ Lighting Assessment, prepared by Tate Consulting; and
- ✓ Noise Assessment, prepared by White Young Green.

1.6 The Proposed Employment Development will result in a high quality, sustainable development which will result in significant investment in the local area and contribute to the Council's priority of supporting and delivering development on strategic employment sites, and in doing so bring hundreds of new jobs to Bognor Regis. It will also act as a catalyst for future development on the surrounding sites. For all of reasons set out within this Statement, planning permission should be granted planning permission without delay.

2 PRE-APPLICATION CONSULTATION & STATEMENT OF COMMUNITY INVOLVEMENT

a) Pre Application Discussions with Arun District Council

- 2.1 The NPPF provides the Government's most up-to-date policies relating to pre-application engagement and highlights the importance of pre application discussions to improve the efficiency and effectiveness of a planning application.
- 2.2 Paragraph 189 of the NPPF states:
- “Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage”**
- 2.3 Paragraph 190 continues:
- “The more issues that can be resolved at pre-application stage the greater the benefits.”**
- 2.4 In light of this clear guidance, the Applicant carried out a pre-application consultation exercise with Arun District Council and statutory bodies such as the Environment Agency. The Proposed Employment Development was presented to Officers at the pre-application meetings and they provided feedback which was then taken into consideration in the final design. At the final pre application meeting in May 2014 the scope and format of the planning application was agreed between the Applicant and Council. Quod has subsequently engaged further with Officers as the proposals have developed which has included very helpful information sharing, particular from the ecology surveys which have been undertaken to support the Local Development Order.
- 2.5 All of the feedback received from Officers has been addressed by the Applicant who welcomed the Councils positive and supportive response to the application proposal. The pre-application consultation guidance as set out in the NPPF has been followed by the Applicant, resulting in a cooperative and proactive relationship with the Council. The proposed development is therefore robust and consistent with the Council's aspirations for this site.



b) Statement of Community Involvement

- 2.6 As Officers will be aware, and as we shall come on to detail further, the application site is an allocated employment site. The application proposals comprise an employment development which is entirely compliant with both national and local planning policies.
- 2.7 Engagement with the community prior to submitting the application was therefore deemed to be unnecessary in this instance. Notwithstanding this, nearby residents and any others with an interest in the site will be given the opportunity to comment on application as part of the Council's statutory consultation process.

3 FACTUAL BACKGROUND

a) Site and Surrounding Area

- 3.1 The Site extends to some 16.02 hectares which includes a Flood Compensation Area (FCA) to the north (6.59 hectares) and the development site to the south (9.43 hectares). Both parcels of land are arable fields which are currently in agricultural use.
- 3.2 The village of Shripney lies approximately 0.5 kilometres north of the Site. The Oldlands Farm buildings and two cottages are situated to the south and a national railway line sits on the Site's eastern boundary. Beyond the railway line is the former LEC Airfield, which is also allocated for employment uses. Immediately to the south of the Site is the Southern Cross Industrial Estate which is an established industrial area comprising approximately 25 units across a range of employment generating uses, predominantly within Classes B1, B2 and B8. The hamlet of North Bersted is situated approximately 2.5 kilometres to the west of the site with further arable land and a caravan park (which forms part of an emerging strategic employment allocation) in between.
- 3.3 The Site lies in a strategic employment location just off the A29 and although access is currently limited due to its location approximately 6 kilometres south of the A27 via part single and dual carriageways, a strategic bypass to Bognor Regis (A259 Bognor Relief Road) is currently under construction directly to the north of the site which will reduce local congestion, making the Site more accessible, providing an ideal location for the proposed industrial/warehouse facility.
- 3.4 A site location plan (ref: 30699-PL-100) appears at **Document 1**.

b) Relevant Planning History

- 3.5 March 2014 (Ref. BE/61/13) – Planning permission granted for a hybrid application for (1) Full planning permission granted for access road and flood compensation area (2) outline planning permission granted for 33,116 square metres of mixed commercial and industrial uses, comprising A1, A3, A5, B1, B2 and B8 with associated works and landscaping. A copy of the decision notice appears as **Document 2**. The permission was not subject to a legal agreement. As mentioned,



whilst the proposed development covers much of the land envisaged by the outline, Phase 1a of this permission remains unaffected by the application proposals and readily deliverable.

- 3.6 December 2008 (Ref. BE/1/08) – Outline planning permission was refused for a mixed-use development comprising a high quality business park of up to 19,500 square metres, and a supermarket of up to 4,459 square metres net sales area, together with parking, new highway and associated servicing infrastructure and landscaping. This application was a departure from the Local Plan and the reasons for refusal reflected this. The Council found that the application would result in the loss of land allocated for employment use, and would prejudice the comprehensive development of the site as whole. The proposal also failed to demonstrate that there was sufficient demand for the B1a office development and that there was insufficient need for the proposed out of centre retail development. In addition, insufficient evidence regarding floodrisk was provided with the application.
- 3.7 April 1987 (Ref. BE/129/86) – Withdrawn application for change of use of redundant agricultural buildings to small factory units including minor elevation improvements and the demolition of an ‘Atcost’ barn.
- 3.8 There is no other history of relevance.

4 EIA SCREENING REQUEST

- 4.1 The Proposed Employment Development on land at Oldlands Farm falls within Schedule 2 of the EIA Regulations as an 'Industrial estate development project' (10a). The main development Site is 9.43 hectares plus a 6.59 hectare Flood Compensation Area and, therefore, exceeds the associated threshold of 0.5 hectares, as defined in Schedule 2. Although the size of the site exceeds the associated threshold, it does not fall within a sensitive area as defined by Schedule 3 of the EIA Regulations. As such, a Screening Opinion is nevertheless required.
- 4.2 It is worth noting that an EIA Screening Request was previously submitted by Hanbury in relation to the March 2014 planning permission (ref. BE/13/61) for a mixed-use commercial development on a 19 hectare area which included the Site. On 23 April 2013, the Council determined that development of up to 50,000 square metres did not constitute EIA development as it would not cause such undue impacts that they could not be assessed through a planning application. A copy of that Screening Opinion appears as **Document 3**.
- 4.3 A more recent Screen Opinion has also been issued in respect of the Local Development Order. This again confirmed that the development of a much bigger parcel of land extending to approximately 30 hectares did not constitute EIA development.
- 4.4 The size and scale of the Proposed Employment Development will be significantly smaller than this mixed use development, resulting in fewer impacts and we therefore do not consider that the Proposed Employment Development constitutes an EIA development.
- 4.5 Nevertheless, in the interests of completeness, Quod, on behalf of Bericote Properties Limited, formally request a Screening Opinion under Regulation 5 of the Town and Country Planning (EIA) (England & Wales) Regulations 1999 (the EIA regulations) for the erection of 2no. detached industrial/distribution units (B1(c)/B2/B8) including access and servicing arrangements, car parking, landscaping and associated flood compensation area.
- 4.6 We look forward to receiving the Screening Opinion within the necessary period, as specified in the EIA Regulations.

5 PROPOSED DEVELOPMENT

5.1 Full planning permission is sought for the following development:

“Erection of 2no. detached industrial/distribution units (B1(c)/B2/B8) including access and servicing arrangements, car parking, landscaping and associated flood compensation area”

5.2 The application includes a total Gross Internal Area of 38,099 square metres:

Description	Unit 1 (sqm GIA)	Unit 2 (sqm GIA)
Unit 1	19,600	
Store and gatehouse	49	
Expansion option (Q4 2017)	6,000	
Unit 2		8,250
Workshop		1,200
Expansion option (Q4 2018)		3,000
Totals	25,649	12,450

5.3 The development will be phased with Unit 1 commencing construction in October 2014 and Unit 2 in September 2015. The expansion options will be built out as subsequent phases of development, based on occupier demand. Phasing plans will be prepared to support the application to illustrate the phasing of construction works.

5.4 Unit 1 is situated to the south west of the site with Unit 2 situated to the north east. Both of the units will be faced in metallic cladding except on their northern elevations which will have non reflective cladding. The perceived bulk and scale of the elevations will be reduced by breaking down the cladding into bays.

- 5.5 Cars and motor cycles will enter the development through dedicated access points, separate to service vehicles. Car parking is provided to the front of each unit whilst servicing trucks and vans will enter the service yard, which is situated between the two units, after passing a security gatehouse which is situated at the entrance to the service yard.
- 5.6 Covered cycle parking will be provided and a Travel Plan will be implemented in order to encourage sustainable travel amongst staff.
- 5.7 It is anticipated that both of the units will be operated by a single tenant and used for manufacturing, storage and distribution purposes and permission is being sought for B1(c), B2 and B8 uses.
- 5.8 The Proposed Employment Development has come forward following a long standing commitment from the Council for employment development on this site. This commitment is being brought forward in the emerging Local Plan and within the Local Development Order which is currently being prepared for a wider area including the Site.
- 5.9 In order to address the Site's position within Flood Zone 2 and 3, the application site located to the north of the relief road will be excavated to lower the existing ground levels. This will result in the creation of a flood compensation storage area. The excess soil will be used to build up the levels on the main development site, thus reducing the risk of flooding. When the northern plot is not in flood, it will remain in agricultural use.
- 5.10 The application is supported by a detailed landscaping scheme, prepared by Davies Landscaping which is shown on the following plans:

Reference	Title	Scale
DLA-1606-L02-03 Rev C	Planting Proposals	1:500 @ A0
DLA-1606-L02-02 Rev F	Hard Landscape Layout	1:500 @ A0

- 5.11 For more detailed commentary on design, please refer to the Design and Access Statement prepared by MSA Architects. The design is also clearly illustrated on the following existing and proposed drawings which form part of the application documents:

Reference	Title	Scale
30699-PL-100B	Site Location Plan	1:2500 @ A1
30699-PL-103	Existing Site Plan	1:1000 @ A1
30699-PL-101A	Site Layout Plan	1:1000 @ A1
30699-PL-102A	Roof Plan	1:1000 @ A1
30699-PL-110A	Unit 1 Floor Plans	1:500 @ A1
30699-PL-111A	Unit 2 Floor Plans	1:500 @ A1
30699-PL-120A	Unit 1 Elevations & Section	1:500 @ A1
30699-PL-121A	Unit 2 Elevations & Section	1:500 @ A1
30699-PL-125A	Gatehouse	1:100 @ A1
30699-PL-126	Battery Store	1:100 @ A2
30699-PL-135	Unit 1 Illustrated Colour Elevations	1:500 @ A1
30699-PL-136	Unit 2 Illustrated Colour Elevations	1:500 @ A1

5.12 The Proposed Employment Development will have a 24 hour use that is unrestricted in terms of its operation. A Noise Assessment has been prepared by WYG which concludes that external noise levels during all 24 hours of operation are predicted to be in the lowest observable adverse effect level criteria, based on worse case assumptions.

5.13 Section 6 provides the planning policy context against which the development will be assessed.

6 RELEVANT PLANNING POLICY

- 6.1 This section identifies the relevant policy framework applicable to the determination of this planning application.
- 6.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications are to be determined in accordance with the Development Plan unless other material considerations indicate otherwise.
- 6.3 The Development Plan for this site comprises of the Arun Local Plan Saved Policies (April 2003, saved September 2007) and the Arun Local Plan 2013 – 2029 (Publication Version, January 2014). Material considerations comprise of the National Planning Policy Framework (2012) and relevant Supplementary Planning Documents.
- 6.4 The National Planning Policy Framework (NPPF), published in March 2012, states that decision takers should give due weight to relevant policies in existing plans according to their degree of consistency with the NPPF.
- 6.5 The policy documents relevant to this planning application are summarised below and an interpretation of these policies is set out in the Section 7.
- 6.6 The supporting application documents submitted as part of the planning application provide more detailed assessment of some of the matters discussed.

a) Development Plan

- 6.7 Policy SITE 5 of the Arun Local Plan (2003), hereafter referred as the Local Plan, allocates the Site as part of an 11.2 hectare commercial site, north of Oldlands Farm, as shown on the Proposals Map.
- 6.8 The Site is allocated for commercial purposes in order to meet the Council's priority of promoting strategic employment sites which will promote the provision of adequate employment opportunities for the local resident workforce.

6.9 In order to ensure that sufficient employment floorspace within the Arun would be provided during the Local Plan period, Policy GEN6 makes provision within the District for 206,300 square metres of commercial floorspace for business, industry and warehousing. This figure includes 164,471 square metres of "large" sites (including the Oldlands Farm).

6.10 Given the Site's location within a Flood Zone 2 and 3, Policy Gen 11 seeks to minimise the risk of flooding by restricting development in areas which are at risk, stating that planning applications in these locations will be at risk unless:

"...compensatory flood storage areas can be provided as part of the development and the function and effectiveness of existing watercourses, are not adversely affected"

6.11 Policy AREA 15 of the Local Plan seeks to protect sites of local importance for nature conservation and from the harmful effects of development. The policy states that development will not be permitted unless:

"it can be demonstrated that reasons for the proposal outweigh the need to safeguard the nature conservation value of the site/feature. Where development is permitted which would damage the nature conservation value of the site/feature, such damage should be kept to a minimum"

6.12 The UDP also contains a number of 'saved' policies in relation to development management considerations. These can be divided into three categories sustainability and design, transport and environment as set out below:

Sustainability & Design

6.13 Policy Gen 1 encourages sustainable development whilst Policy Gen 7 promotes high quality design and layout which makes efficient use of land and buildings.

Transport

6.14 Policies Gen 14 and GEN 12 seek to ensure that the transport impacts have been taken into consideration and that appropriate parking provision is provided with new developments.

6.15 Policy GEN 15 encourages the development of safe cycling and walking by seeking new development to facilitate where appropriate, the opportunity for increased cycling and walking.

Environment

- 6.16 Policies Gen 32 and GEN 33 seek to protect the quality of the environment in terms of noise and light pollution respectively and require details of appropriate measures to minimise any impacts to be included as part of the planning application where necessary.
- 6.17 Policy Gen 30 seeks to ensure the conservation of animal and plant species which are protected by law.

b) Other Material Consideration

i) National Planning Policy Framework (March 2012)

- 6.18 The National Planning Policy Framework (NPPF), published in March 2012, supersedes the majority of national planning policy and guidance. As such, it is the principal document against which to assess applications for development in respect of national policy objectives.
- 6.19 At the heart of the NPPF is the presumption in favour of sustainable development and paragraph 14 confirms that development proposals which accord with the development plan should be approved without delay.
- 6.20 Paragraph 17 sets out 12 core land-use planning principles that should underpin both plan-making and decision taking. The following principles are of particular relevance to the Proposed Employment Development:

“Proactively drive and support sustainable economic development to deliver homes, business and industrial units, infrastructure and thriving local places that the Country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land process and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in that area, taking account of the needs of residential and business communities;

Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;

Take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;

Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework”

- 6.21 Section 1 of the NPPF (Building a Strong Competitive Economy) is particularly relevant to the Proposed Employment Development. Paragraph 18 confirms the government’s commitment to securing economic growth in order to create jobs and prosperity and paragraph 19 reaffirms the government’s commitment to ensuring that the planning system does everything to support sustainable economic growth stating

“Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system”

- 6.22 Paragraphs 20-21 require local planning authorities (LPA’s) to plan positively for economic development to help achieve growth. LPA’s are discouraged from preventing growth through restrictive planning policy expectations and are encouraging them to address any potential barriers to investment by providing suitable infrastructure and services. Paragraph 21 provides guidance to local planning authorities when drawing up local plans stating that they should:

- **Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;**
- **Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;**
- **Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;**
- **Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;**

- **Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and**
- **Facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.”**

6.23 Section 4 (Promoting sustainable transport), Section 7 (Requiring good design) and Section 11 (Conserving and enhancing the natural environment) of the NPPF are also relevant to the Proposed Employment Development.

ii) Planning Policy Guidance (March 2014) (NPPG)

6.24 The PPG provides detailed planning practice guidance to support national and local planning policy. The supporting reports have adhered to the relevant guidance within this document.

iii) Emerging Arun Local Plan (Publication Version January 2014)

6.25 The publication version of the emerging Local Plan was agreed by Full Council in February 2014. It does not include sections on Spatial Portrait, Employment & Enterprise, Housing Allocations, Transport and Monitoring & Implementation. The policies in the plan will be subject to public consultation when the remaining policies have also been agreed. The sections which are included in the publication version of the emerging Local Plan are, however, considered a material consideration in assessing planning applications, albeit with relatively limited weight.

6.26 At present, the Employment and Enterprise chapter of the emerging Local Plan has not been agreed but significantly the introduction to this document confirms that ADC considers economic growth for job creation as its number one priority. The Council aspires to provide the opportunity for working age residents to work within the District and increasing job density will be the central theme of the Plan. The Local Plan will seek to meet this goal by providing policies that will lead to

“diversifying the range of employment sites available to investors; protecting existing viable employment land from other forms of development, encouraging employment growth in manufacturing, cultural, office, leisure, retail, horticulture and marine based activities and freeing up commercial/I enterprise through the use of Local Development Orders”

- 6.27 Despite the absence of a published employment policy there are confirmed policies within the emerging Local Plan which are relevant to the development.
- 6.28 Policy SDSP1 promotes a positive approach to sustainable development, stating that the Council will work proactively with applicants to jointly find solutions so that proposals can be approved and that:
- “...planning applications that help to achieve the central aim of this Local Plan, which is to increase employment density and which accord with the policies in this Local Plan and/ or adopted Neighbourhood Development Plan will be approved, unless material considerations indicate otherwise”**
- 6.29 Although the Employment and Enterprise chapter of the emerging Local Plan has not been published, we understand from conversations with Officers that Policy SP6 of the abandoned 2013 Local Plan will be brought forward. This policy identifies the Oldlands Site as a Strategic Land Allocation designed to serve and promote local economic development. This policy is not currently a material consideration; however it provides a clear evidence of the Council’s commitment to keeping the employment allocation on the site.
- 6.30 Policy ENV DM15 provides guidelines on the impacts of development on biodiversity, requiring development schemes to seek to achieve a net gain of biodiversity and to protect existing habitats on site. This policy requires planning applications for development on sites where there is evidence of protected species to include details of measures to be incorporated into the development scheme to avoid the loss of species.
- 6.31 Policies ECC SP1 and ECC SP2 refer to energy and climate change requiring development to be located and designed appropriately to adapt to impacts resulting from climate change such as flooding. In addition, Policy ECC SP2 requires all new applications for commercial development to demonstrate how they will meet the appropriate BREEAM rating and to produce 10% of predicted energy requirements from renewable or low carbon energy generation on site, unless it can be demonstrated that this is unviable.
- 6.32 In relation to development management matters, the policies that have to date been confirmed in the emerging Local Plan are addressed below under the headings Design and Environment.

Design

- 6.33 Policy D SP1 requires all development proposals to demonstrate a high standard of design which is the result of a thorough site analysis and considers the efficient use of land including scale, massing, materials, finish and nearby habitats.
- 6.34 Policy D DM1 sets out what design considerations that the Council will take into account when determining a planning application such as the character of the area, appearance of the development, the impact of the development such as daylight, privacy etc., design innovation, adaptability, crime prevention, landscaping, layout and public realm.

Environment

- 6.35 The Council requires all development to contribute positively to the quality of the environment and Policy QE SP1 seeks to ensure that all development does not have a significant detrimental impact on residential amenity, the natural environment and leisure activities.
- 6.36 Policy QE SP1 requires new noise generating development to demonstrate that the development meets appropriate national and local standards for noise and will not impact on areas identified as valuable for their tranquillity.
- 6.37 Policy QE SP2 requires planning applications for a development which will have an external lighting scheme to be prepared according to the latest national lighting design guidance.

iv) Employment and Economic Land Assessment (December 2010)

- 6.38 The Employment and Economic Land Assessment (EELA) was prepared as part of the evidence base for the 2013 Local Plan which was withdrawn in May 2013 so that the Council could consider housing allocations.
- 6.39 The EELA provides an overview of the employment land available until 2026 including the quantity, type and broad location required to help deliver the Economic Strategy objectives, as well as more general policy recommendations on protecting and enhancing employment sites. The purpose of this document is to provide evidence in support of the development of the LDF.

6.40 The document refers to 23 hectares at Oldlands Farm, consisting of two sites (one being the application site), as the largest undeveloped land allocation in the District, which forms a significant proportion (77%) of the available supply of employment land offering development opportunities. The Study brings to light concerns that there could be a significant shortfall of employment space if the Oldlands Farm allocation failed to come forward for employment development.

v) *Coast to Capital Strategic Economic Plan (March 2014)*

6.41 This Strategic Economic Plan was adopted in March 2014 by Arun District Council and the Coastal West Sussex and Greater Brighton Strategic Planning Board.

6.42 It proposes a six year programme of investment in business and critical infrastructure including transport and flood defences to deliver vigorous business growth, backed by the necessary investment in additional housing and communities in the London to the Brighton Region. The plan identifies nine locations where growth will be delivered, including the Bognor Regis Enterprise Zone.

6.43 There are six strategic priorities at the heart of the plan:

- Successful growth locations, including transport investment;
- Successful Businesses;
- Building Competitive Advantage;
- Skills and Workforce;
- Growth is Digital; and
- Housing and infrastructure

6.44 The plan seeks to invest £3.3 bn of public and private sector money, including significant investment (£61 million) from the European Union to create 60,000 new jobs; 26,000 new homes and 970,000 square metres of employment floorspace.

6.45 Oldlands Farm is identified as one of four sites which were submitted to be allocated as the Bognor Regis Enterprise Zone. Although this bid was eventually unsuccessful, the Council is currently preparing a Local Development Order for the three sites – Oldlands Farm, Saltbox and Rowan Park (the LEC Airfield site has been recently removed from the LDO area). The LDO will be in place towards the end of 2014 and will effectively grant permitted development rights for new business-related development on these sites and allowing owner-occupiers and developers to benefit from an accelerated as well as simplified planning process and a reduction in planning application fees.

c) Summary

6.46 In summary, the Arun Local Plan (2003) is the starting point for assessing the proposals, however given the age of this plan, the NPPF and its underlying ‘presumption in favour of sustainable development’ is a key material consideration which should be given significant weight in the determination of the enclosed application.

6.47 The Site is allocated for employment in both the adopted and emerging Local Plan, and it also forms part of the land that will be subject to a Local Development Order which is currently under preparation and, in summary, will grant automatic planning permission for employment uses on the site. Whilst the development is not relying on the LDO, its existence as an emerging Council aspiration is significant in the context of the policy compliant proposals.

6.48 Section 7 provides a detailed assessment of the application proposals against the policy objectives summarised in this section together with all other relevant material considerations.

7 PLANNING CONSIDERATIONS

a) **Principle of Development**

- 7.1 The Site is allocated for 'employment' on the adopted Local Plan Proposals Map (2003) and is expected to be allocated as a Strategic Employment Zone in the emerging Local Plan. The Council is committed to protecting this site allocation which will provide a significant proportion of employment land for the District.
- 7.2 The Proposed Employment Development will provide two industrial / distribution units which will facilitate B1(c), B2 and B8 uses. It is therefore offered in principle support by the site's existing and emerging allocation.
- 7.3 Further, a Local Development Order is currently being prepared by the Council which is expected to be adopted in autumn 2014. This Order will automatically grant planning permission and other permitted development rights for employment development on this site.
- 7.4 It is recognised at all levels that there is a critical need to create employment opportunities in the District. The Proposed Employment Development has the potential to create between 500 and 1,000 jobs and will result in a significant investment the local economy.
- 7.5 In summary, national and local planning policies support employment development on this site which will contribute to creating a stronger economy in Bognor Regis and the wider District.

b) **Development Management Policies**

i) **Design**

- 7.6 The accompanying Design and Access Statement (DAS), prepared by MSA Architects, provides details of the rationale behind the design of the 2no. industrial/distribution units.
- 7.7 Unit 1 comprises a total of 25,649 square metres (GIA) including a 19,600 square metre warehouse and a 6,000 square metre expansion area to be constructed as a second phase of the development.

- 7.8 Unit 2 comprises a industrial/warehouse building with a total internal area of 12,450 square metres which includes a workshop (1,200 square metres) and an expansion option of 3,000 square metres also to be completed as a further phase of development.
- 7.9 In addition to the two warehouses, the application includes details of a store and gatehouse of 49 square metres which will be situated at the entrance to the service yards.
- 7.10 The total built floorspace on the site totals 38,959 square metres (GEA). Careful consideration has been given to the scale of the buildings, to ensure that they relate to one another and their surroundings. The buildings will make an efficient use of the site whilst providing a high quality space suitable for their function complying with saved 'policy' GEN 7.
- 7.11 The design of the development has been thoroughly considered and the accompanying Landscape and Visual Impact Assessment prepared by Davis Landscape Architects provides further detail on how the development fits in with its surrounding environment. The buildings will have a ridge height of 13.6 meters, typical of development of this kind and allowing for internal racking systems. The location is not considered sensitive to landscape or visual change and with its position within a wider strategic employment area, the quantum of floorspace is considered to be acceptable for this location adjacent to an existing industrial estate to the south.
- 7.12 The Design and Access Statement prepared by MSA architects provides details of the design concept which evolved following a thorough site analysis and appraisal. The end result is high quality, flexible buildings that relate to the character of the surrounding environment with a high quality landscape scheme that will be easily maintained. The proposals therefore comply with 'saved policies' GEN7 and policies D SP1 and D DM1 of the emerging local plan.

ii) Layout

- 7.13 The form of the development has been determined by the primary use of the buildings which requires large scale, high buildings to ensure that they function adequately. The layout offers direct and safe access to the buildings from the car park and provides the best outlook for the area where staff will spend most of their time. The rectangular shape lends itself to achieving the balance of the external wall area required to maximise the number of loading doors with achieving the adequate depth for internal racking and storage layouts.

- 7.14 The design provides two units of different sizes in response to market demand for facilities of this kind. Separate access for HGVs and cars ensures that car parking is positioned at the front of the building adjacent to the road, in order to minimise on-site travel for customer and staff cars.
- 7.15 For further information on the site layouts, please refer to the accompanying Design and Access Statement.

iii) Traffic & Transportation

- 7.16 The enclosed Transport Assessment prepared by Hydrock provides an assessment of the potential transport impacts of the Proposed Employment Development.
- 7.17 The extant planning permission (ref. BE/61/13) represents the baseline upon which the Transport Assessment (TA) was based. Although the mix of uses and floorspace eventually changed during the determination period, the original baseline upon which the TA is based represents a higher quantum of development, approved by the Highways Authority, which would have had a greater transport impact on the surrounding area.
- 7.18 The accessibility of the Proposed Employment Development by a range of modes of transport was considered in line with the objectives of the Local Transport Plan and NPPF. It found that the existing local highway network provides a strategic network of footways with a good level of street lighting allowing safe opportunities for walking journeys.
- 7.19 The Site was found to be within acceptable walking distance from bus stops which are served by regular buses Monday – Saturday to Bognor Regis and other nearby towns. Bognor Regis Rail Station is situated 2.4 kilometres to the south west and can be accessed by bus from the Site. As such, the Site is considered to be well served by public transport options. For further details, please refer to the Transport Assessment.
- 7.20 The TA also demonstrates that the Hanbury outline application (specifically the development envisaged in Phase 1a) and the Bericote full planning application can be accommodated on the highway network without any unacceptable traffic impacts.

7.21 In summary, the TA found that the proposals are acceptable in highways and transportation terms and there are no highways or transportation related reasons upon which a refusal of the planning application for the proposals would be justified.

7.22 It was considered that a Travel Plan would be submitted prior to occupation of the development, ensured by a Condition of planning permission, in order to provide the final occupier with the opportunity to contribute to its requirements. This was agreed with officers during pre-application discussions.

iv) Flood Risk

7.23 The Site is within Flood Zones 1, 2 and 3 as defined by the Environment Agency. A strategy has been adopted to locate the main development site out of the flood zone by raising levels and a Flood Compensation Area has been created north of the Bognor Relief Road to facilitate this. An attenuation pond along with below ground oversized pipes will be situated to the east of the development site which will retain excess rainwater due to outflow restriction set by the predevelopment greenfield run off rates. New private surface water networks will be designed in line with current British Standard guidance up to the 100 year storm return period including an allowance for climate change.

7.24 In addition, the use of SuDS such as rainwater harvesting (to be confirmed), permeable paving (to be confirmed) and ponds with restricted outflow to the local watercourse in line with the required runoff rates will help mitigate any flood risk impact to the surrounding areas.

7.25 In summary, the accompanying Flood Risk Assessment prepared by Hydrock demonstrates that the risk of flooding to the new development layout is low, and that the Site has a very low risk of flooding from fluvial or by all other sources of flood risk, due to the flood compensation proposed.

7.26 It should also be highlighted that a feasibility exercise has been undertaken to ensure that flood compensation arising from Phase 1a of Hanbury's outline application can be accommodated within the redline area of their scheme. That additional compensation area can also be accommodated as an extension to the FCA proposed under this application meaning there will be a single flood compensation area to the north of the relief road dealing with both developments. A plan demonstrating this will be submitted in due course. This will provide further evidence that

our full permission and Phase 1a of Hanbury's permission can be implemented together with one not prejudicing the other.

v) Ecology

- 7.27 Ecological surveys were undertaken on behalf of the Applicant and the enclosed Ecological Reports prepared by Tim Moya Associates provide details and recommendations for protection and enhancement of the ecological value of the Site. The surveys included an assessment of the habitats found within the Site and the likely impact of the proposed development on habitats of ecological value as well as protected and notable species. In addition to the above, surveys were undertaken in March - June 2014 particularly in regard to wintering and breeding birds.
- 7.28 The Applicant has proposed a number of enhancements in and around the Site such as providing an attenuation pond, meadow grassland, and planting native trees and shrubs to minimise any damage to existing habitats in line with Policy AREA 15 of the Local Plan (2003).
- 7.29 Full details of the species and habitats on the Site can be found in the accompanying Extended Phase 1 Habitat Survey, Breeding Birds Report and Wintering Birds Report as required by Policy ENV DM5 of the emerging Local Plan (2014).

vi) Archaeology

- 7.30 The information currently available suggests that any archaeological remains are focused in the area previously investigated by Cotswold Archaeology. In preparation for this planning application, CgMS has been in regular contact with Mark Taylor, the Council's planning archaeologist, who has agreed that a geophysical survey was to be carried out and that a geoarchaeologist from Archaeology South East will monitor the geotechnical testpits being excavated by Hydrock during the determination period. It has been agreed that a further full Archaeology Assessment is not necessary to support the planning application.
- 7.31 As such, on behalf of the Applicant, CgMS will continue to liaise with the Council's Planning Archaeologist to ensure compliance with the Council's archaeological and conservation policies.

vii) Noise

- 7.32 A detailed Noise Assessment, prepared by White Young Green, has been submitted in support of this planning application. This report considers the potential noise impact of the 24 hour operation of the potential external noise sources at both proposed units. Specifically the report considers building services plant, car parking, pallet storage, waste recycling facility, goods deliveries/loading (HGV movements and docking - refrigerated and non-refrigerated vehicles).
- 7.33 The Noise Assessment also considers the Tranquillity Setting of the Site as defined by the mapping date published by the Campaign to Protect Rural England. The Site is within a Tranquillity Zone 4, however, as it is adjacent to industrial uses and the future Bognor Relief Road and there is currently no public access to the site it is considered that Proposed Employment Development would have a negligible effect on local access to areas of tranquillity.
- 7.34 As such the Proposed Employment Development complies with Policy GEN23 of the Local Plan (2003) and Policy QE DM1 of the emerging Local Plan (2014).

viii) Energy

- 7.35 An Energy Statement has been prepared by Tate Consulting which examines the energy efficiency and low carbon measures of the Proposed Employment Development in the context of national and local planning policy.
- 7.36 The Energy Statement outlines how the Proposed Employment Development will meet the Council's requirement for 10% of energy to come from renewable or low carbon technologies for commercial development over 1,000 square metres in accordance with 'saved' policies SP17 and SP18 and policies ECCSP1 and ECCSP2 of the emerging Local Plan.
- 7.37 The buildings will also be constructed to BREEAM 'very good' standards.
- 7.38 In summary, the application of energy reduction and energy efficiency measures used in the construction and operation of the Proposed Employment Development results in the use of 34% less energy and 25% less Co2 than if constructed to the standards required by Building Regulations Part L2.

ix) Lighting

- 7.39 The submitted Lighting Statement prepared by Tate Consulting demonstrates how the Proposed Employment Development will meet the relevant policies as set out in the Local Plan and the emerging Local Plan.
- 7.40 External lighting is a requirement in order ensure safety of vehicular and pedestrian movements, security of the buildings, property and staff and to allow for an extended working practices on the site. This is particularly important given this is a 24 hour facility.
- 7.41 A series of control measures will be implemented to prevent light pollution and the lighting scheme will be designed so as to meet the British Standards as set out in the accompanying Lighting Statement in compliance with Policy GEN 33 of the Local Plan (2003) and Policy QE DM2 of the emerging Local Plan (2014).

c) Summary

- 7.42 It has been demonstrated that the Proposed Employment Development complies with the requirements of the Arun District Development Plan. In accordance with paragraph 14 of the National Planning Policy Framework, this planning application should therefore be granted planning permission without delay. The principle of development is clearly acceptable and all other relevant development management considerations have been addressed in the supporting documents.

8 CONCLUSIONS

- 8.1 This Planning Statement has demonstrated that the Proposed Employment Development complies with the relevant 'saved' policies of the Arun Local Plan (2003), the confirmed policies within the Arun Local Plan (Publication Version, 2014) and the National Planning Policy Framework (2012).
- 8.2 The development has been subjected to pre-application discussions with Officers in Arun District Council and will contribute significantly towards the Council's key priority of creating employment opportunities in the District for working age residents. The design and landscaping scheme has been thoroughly considered resulting in a high quality development which will not have a significant effect on the local environment.
- 8.3 Overall the Proposed Employment Development will result in a number of economic, social and environmental benefits as well as supporting the aims of the local planning and economic policy at a local and national level. On the basis that the proposal accords with the development plan, the presumption in favour of sustainable development should be applied and planning permission granted without delay.