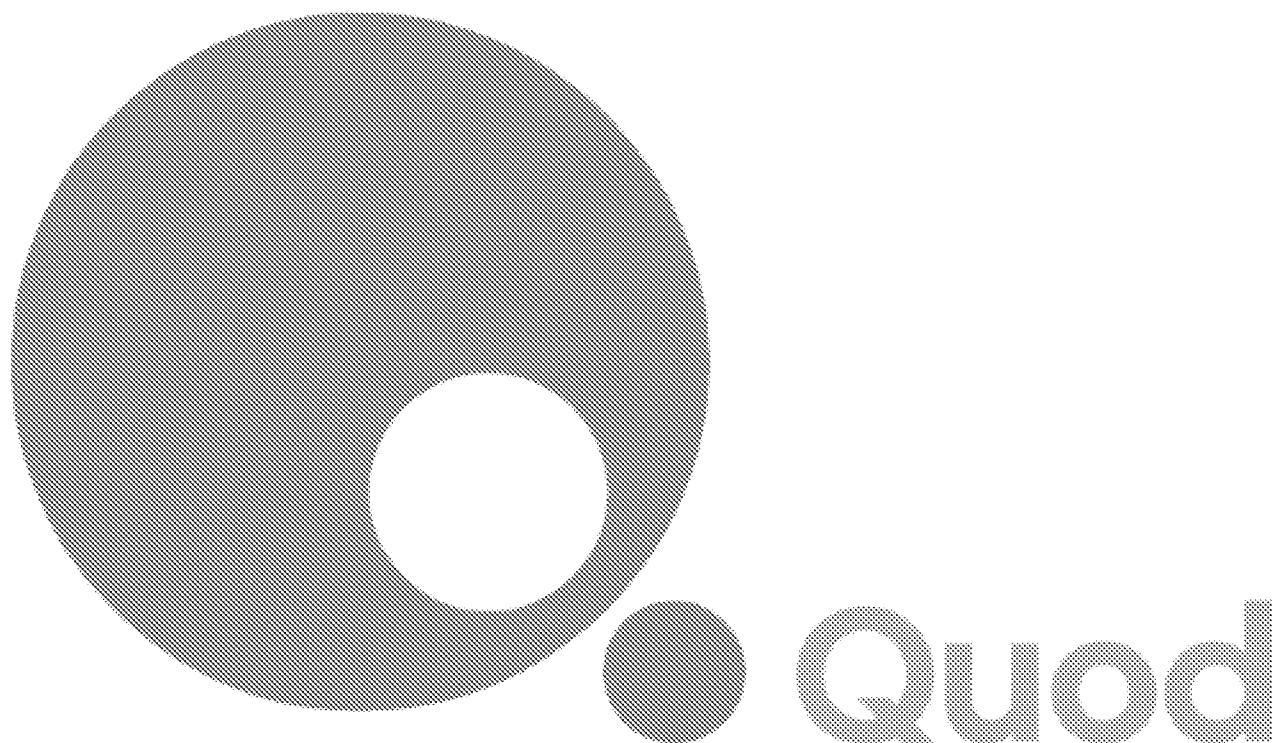




PLANNING STATEMENT

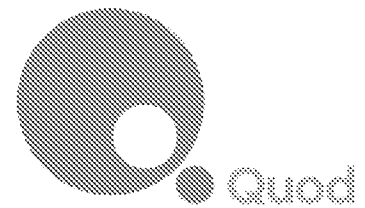
PROPOSED EMPLOYMENT
DEVELOPMENT ON LAND AT
OLDLANDS FARM, SHRIPNEY
ROAD, BOGNOR REGIS, PO22
9NN

ON BEHALF OF BERICOTE
PROPERTIES LIMITED

23 June 2014

Our Ref: Q50031



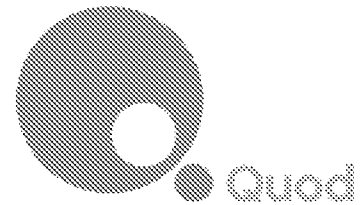


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Documents

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:

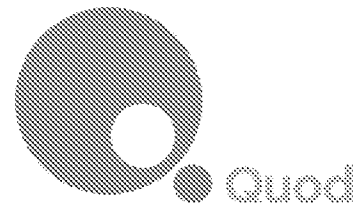
“Erection of 2no. detached industrial/distribution units (B1(c)/B2/B8) including access and servicing arrangements, car parking, landscaping and associated flood compensation area”

- 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:

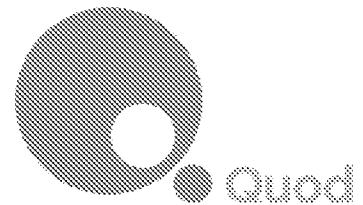
"Local planning authorities have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage"

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.

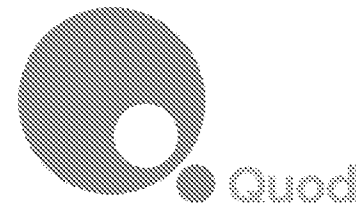
3 FACTUAL BACKGROUND

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.



DOCUMENT 1

SITE LOCATION PLAN (REF. 30699-PL-100)



NOTES:

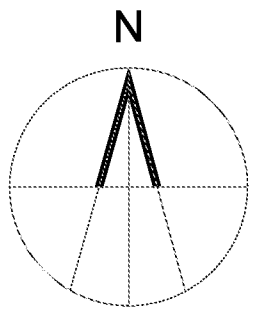
SUBJECT TO STATUTORY CONSENTS

BASED ON MALCOLM HUGHES LAND SURVEYOR'S
TOPOGRAPHICAL SURVEY (DRAWING No. 16473 / 1)

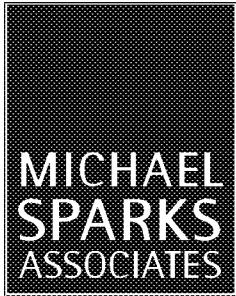
BASED ON OS MAP REPRODUCED BY PERMISSION OF
CONTROLLER OF HM STATIONARY OFFICE (c) CROWN
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MICHAEL SPARKS ASSOCIATES OF ANY DISCREPANCIES



B	23.06.14	GENERAL AMENDMENTS	PF	NSC
A	20.06.14	GENERAL AMENDMENTS	PF	NSC
REV	DATE	NOTE	DRAW	CHK



REGISTERED ARCHITECTS
11, ALBERT ROAD
SUTTONS, WIMBORNE
DORSET BH20 4EJ
TELEPHONE 01202 7726 81/82
FAX 01202 5155 59/60
www.mspa.co.uk

TITLE
OLDLANDS FARM, BOGNOR REGIS
DRAWING
SITE LOCATION PLAN

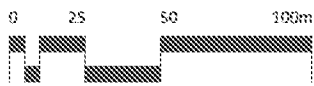
CLIENT
BERICOTE PROPERTIES LTD

DATE JUNE 2014	SCALE 1:2500@A1	DRAWN PF
	STATUS PLANNING	CHECKED NSC

DRAWING NUMBER
30699-PL-100B

01
100

SITE LOCATION
1:2500





DOCUMENT 2

EXTANT PLANNING PERMISSION (ADC REF. BE/61/13)



**Town & Country Planning Act 1990 (as amended)
Town & Country Planning (Development Management
Procedure) (England) Order 2010 (as amended)**

**Application for Planning Permission
DECISION NOTICE**

Application Ref: BE/61/13/

- | | |
|---|--|
| 1 | To Addressee
Mr Graham Beck
Luken Beck mdp Ltd,
30 Carlton Crescent,
Southampton,
Hampshire,
SO15 2EW |
| 2 | Site Address
Oldlands Farm,
Steyning Way,
Bognor Regis
PO22 9NN |
| 3 | Description of Development
HYBRID APPLICATION.
1: Full planning application for Access and road and Flood compensation area.
2: Outline application for 33116 sq m of mixed commercial and industrial uses, comprising A1, A3, A5, B1, B2 and B8, with associated works and landscaping. |
| 4 | <p>In pursuance of their powers under this Act and related Orders and Regulations the Council PERMIT this development to be carried out in accordance with the application and plans and subject to compliance with the conditions specified below and the obligations under the Section 106 Agreement</p> <p>The conditions below refer to the 'full' matters within the planning application (Access Road and Flood compensation area)</p> <p>1 The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.</p> <p>Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).</p> <p>2 The development hereby approved shall be carried out in accordance with the following approved plans and statements:</p> <ol style="list-style-type: none">1. Site Location Plan DLA/1536/003/012. Red Line Boundary Plan DLA/1536/003/023. Development Framework Plan DLA/1536/003/034. Land Ownership Plan DLA/1536/003/03 Rev A |

-
5. Illustrative Site Layout 1536/003/04
 6. Landscape Masterplan DLA/1536/003/05
 7. Phasing Plan DLA/1536/003/06
 8. General Road Arrangement- Reserved Matters DLA/1536/003/07
 9. Enabling Plan DLA/1536/003/08
 10. General Road Arrangement- Reserved Matters DLA/1536/003/09
 11. Tracking Plan Drawing 4692:P:914 Rev A
 12. Visibility Plan Drawing 4692:P:915 Rev A
 13. Level Plan Drawing 4692:P:908 Rev
 14. Drainage Strategy 4692:P:904

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with policy GEN7 of the Arun District Local Plan.

3. Development shall not commence until full details of the proposed surface water drainage scheme have been submitted to and approved in writing by the Local Planning Authority.

The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, the recommendations of the SUDS Manual produced by CIRIA.

Winter groundwater monitoring to establish highest annual ground water levels and Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage.

No building shall be occupied until the complete surface water drainage system serving the property has been implemented in accordance with the agreed details.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies GEN7 and GEN9 of the Arun District Council Local Plan.

4. No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority in consultation with West Sussex County Council Highways. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters:

- the anticipated number, frequency and types of vehicles used during construction,
- the method of access and routing of vehicles during construction,
- the parking of vehicles by site operatives and visitors,
- the loading and unloading of plant, materials and waste,
- the storage of plant and materials used in construction of the development,
- the erection and maintenance of security hoarding,
- the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
- details of public engagement both prior to and during construction works.

Reason: In the interests of highway safety and the amenities of the area.

5. No development hereby permitted shall commence until a scheme to provide compensatory flood storage has been submitted to, and approved in writing by, the Local Planning Authority. The scheme shall include:

- Amendments to the current provision (as set out in the submitted FRA, 13/0404/4692) to reflect as far as possible the impact of any changes in modelled levels as a result of updated modelling (where available).

The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme

Reason: To prevent flooding to the site and elsewhere by ensuring that compensatory storage of flood water based on the best information available is provided in accordance with the NPPF.

6. No development shall take place until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the Local Planning Authority. The drainage strategy should:

- Demonstrate the surface water run-off generated up to and including the 1 in 100 yr plus 30% for climate change critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event (as stated within the approved FRA ref: 13/0404/4692) .
- Consider pollution prevention measures.

The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

Reason: To prevent an increased risk of flooding, both on and off site and to prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution in accordance with the NPPF.

7. No development approved by this planning permission shall take place until a remediation strategy that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:

1. A site investigation scheme, based on the Desk Study Review and Preliminary Ground Appraisal letter report to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
2. The results of the site investigation and the detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
3. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express written consent of the Local Planning Authority. The scheme shall be implemented as approved.

Reason: To prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution in accordance with the NPPF.

The site lies above the Lewes Nodular Chalk which is designated a Principal Aquifer. Contamination may be present at the site as a result of its historical use(s). Any contamination present may pose a risk to groundwater underlying the site and potable supplies.

8. No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: To prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution in accordance with the NPPF.

The site lies above the Lewes Nodular Chalk which is designated a Principal Aquifer. Contamination may be present at the site as a result of its historical use(s). Any contamination present may pose a risk to groundwater underlying the site and potable supplies.

9. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the Local Planning Authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: To prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution in accordance with the NPPF.

The site lies above the Lewes Nodular Chalk which is designated a Principal Aquifer. Contamination may be present at the site as a result of its historical use(s). Any contamination present may pose a risk to groundwater underlying the site and potable supplies.

10. No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution in accordance with the NPPF.

The site lies above the Lewes Nodular Chalk which is designated a Principal Aquifer. Contamination may be present at the site as a result of its historical use(s). Any contamination present may pose a risk to groundwater underlying the site and potable supplies.

11. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution in accordance with the NPPF.

12. Piling or any other foundation designs using penetrative methods can result in risks to potable supplies from, for example, pollution / turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. It should be demonstrated that any proposed piling will not result in contamination of groundwater.

Reason: The site incorporates/is bounded by Oldlands Farm Ditch, an Internal Drainage Board watercourse under the jurisdiction of the Environment Agency. Any works whatsoever in, over, or under the channel of this watercourse or on its banks within 5 metres from the top of the channel, would require the prior consent of the Agency under Section 23 of the Land Drainage Act 1991 and/or Byelaws.

13. An archaeological investigation of the site shall be carried out at the expense of the developer in accordance with a specification (written scheme of investigation) to be submitted to and agreed by the Local Planning Authority in writing before the commencement of building works.

Reason: To ensure appropriate investigation and recording of archaeological heritage assets on the site prior to commencement of new building works.

14. No development shall commence until the vehicular access serving the development has been constructed in accordance with the approved planning drawing.

Reason: In the interests of road safety.

15. No part of the development shall be first occupied until provision has been made within the site in accordance with plans and details to be submitted to and approved by the Local Planning Authority to prevent surface water draining onto the public highway.

Reason: In the interests of road safety.

16. No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters,

- the anticipated number, frequency and types of vehicles used during construction,
- the method of access and routing of vehicles during construction,
- the parking of vehicles by site operatives and visitors,
- the loading and unloading of plant, materials and waste,
- the storage of plant and materials used in construction of the development,
- the erection and maintenance of security hoarding,
- the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
- measures to control the emission of dust and dirt during demolition and construction, lighting for construction and security,
- details of public engagement both prior to and during construction works.

Reason: In the interests of highway safety and the amenities of the area.

17. No part of the development shall be first occupied until a Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall be completed in accordance with the latest guidance and good practice documentation as published by the Department for Transport or as advised by the Highway Authority.

Reason: To encourage and promote sustainable transport.

18. Prior to the commencement of development of any preparatory works an ecological enhancement scheme shall be submitted to the Local Planning Authority for approval and will be based on the recommendations within the supporting ecological statement. All approved details shall then be implemented in full and in accordance with the agreed timings and details.

Reason: In the interests of the amenity of the environment of the development in accordance with paragraph 118 of the National Planning Policy Framework.

The conditions below refer to the “outline” matters within the planning application

1. Applications for approval of all reserved matters for the first phase of development shall be made to the Local Planning Authority before the expiration of three years from the date of this permission. Thereafter, applications for approval of all subsequent reserved matters relating to each additional phase shall be made to the Local Planning Authority before the expiration of two years from the date of approval of the reserved matters of each of the preceding phases.

The development of the first phase shall be begun within five years of the date of this permission or before the expiration of two years from the date of approval of the last of the reserved matters to be agreed for each phase, whichever is the later. Each further phase shall be commenced within two years of the approval of the last reserved matters consent for that phase.

Reason: Imposed pursuant to the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. Approval of the following details (hereinafter referred to as the reserved matters) shall be obtained from the Local Planning Authority, in writing before each development phase is commenced.

- Layout
- Scale
- Appearance
- The landscaping of the site

Plans and particulars of the reserved matters shall be submitted utilising a planning application form and shall be carried out as approved.

Reason: Because the application is in outline only and as no details have been submitted of the reserved matters, they are reserved for subsequent approval by the Local Planning Authority.

3. The development hereby approved shall (subject to such minor variations thereto as may be approved pursuant to condition 5 below) be carried out in accordance with the parameters and principles shown on the following approved parameter plans and statements:

1. Site Location Plan DLA/1536/003/01
2. Red Line Boundary Plan DLA/1536/003/02
3. Development Framework Plan DLA/1536/003/03
4. Land Ownership Plan DLA/1536/003/03 Rev A
5. Phasing Plan DLA/1536/003/06
6. General Road Arrangement- Reserved Matters DLA/1536/003/07
7. Enabling Plan DLA/1536/003/08
8. General Road Arrangement- Reserved Matters DLA/1536/003/09
9. Tracking Plan Drawing 4692:P:914 Rev A
10. Visibility Plan Drawing 4692:P:915 Rev A
11. Level Plan Drawing 4692:P:908 Rev
12. Drainage Strategy 4692:P:904

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with GEN7 of the Arun District Local Plan.

4. The development hereby permitted shall not exceed a total quantum of 33,116 square metres and within Phase 1a the quantum of any non B1, B2 or B8 (storage and distribution) floor space shall not exceed as the quantum listed below (all Gross Internal Area (GIA)).

- A1 Bulky Goods Retail 4,366 square metres net sales including mezzanine floors
- Sui Generis Car Sales 1,858 square metres
- B8 Trade Counters 1,858 square metres
- B1/B2/B8 Uses 25,034 square metres
- Or in Total B1/B2/B8 Totalling 33,116 square metres

Reason: For the avoidance of doubt and because the highway and retail impacts have been assessed on that basis in accordance with Arun Local Plan policies DEV 26 and DEV 27 and the National Planning Policy Framework.

5. Prior to the submission of any reserved matters application an indicative masterplan shall be submitted to and agreed in writing by the Local Planning Authority in accordance with the Design and Access Masterplan and Landscape Plans. Any variation to the approved masterplan or parameter plans shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the phase of development to which the variations relate. The development shall then be carried out in accordance with the approved plans.

Reason: To allow an appreciation of the possible layout of the development proposed and delivered to date in accordance with Policy GEN7 of the Arun District Local Plan 2003.

6. Prior to the submission of any reserved matters the applicants shall submit to and have approved in writing by the Local Planning Authority a parameter plan and design code, the development shall be carried out in accordance with the approved parameter plans and Design Code.

Reason: In the interests of visual amenity in accordance with adopted policy GEN7 of the Arun District Local Plan 2003

7. The construction of external facing materials for each building shall not take place until details and samples of all external walling, window, door and roofing materials for that building have been submitted to and approved in writing by the Local Planning Authority. Such materials shall be made available on site prior to the commencement of their use, for the inspection of the Local Planning Authority who shall be notified in writing of their availability. The building works shall be constructed from the materials thereby approved.

Reason: In the interests of visual amenity in accordance with Arun District Local Plan Policy GEN7.

8. Typical detailed 1:20 scale (or other appropriate scale) working drawings of the following elevational features shall be submitted to and approved in writing by the Local Planning Authority prior to their construction of each building:

- (a) Sections through external windows and door reveals;
- (b) External entrance areas at ground floor level;
- (c) Junctions of materials;
- (d) Changes in plane to the building elevations; and
- (e) Details of roof parapets, eaves line and soffits to the buildings.

The works shall be implemented as thereby agreed.

Reason: In the interests of visual amenity and providing a high quality design in accordance with Arun Local Plan Policy GEN7

9. The construction of any external finishing materials for each building shall not commence until full details of the siting, design and external appearance of all external plant, flue pipes, external vents, roller shutters, lighting, solar panels or other excrescences to be located on the roof or sides of the building have been submitted to and agreed in writing by the Local Planning Authority. The agreed details shall be implemented and retained thereafter.

Reason: In the interest of visual amenity in accordance with Arun Local Plan policy GEN7.

10. Prior to the commencement of each building, details of any extract ventilation system for that building, including details of a filter to remove odour, and the methods of treatment of the emissions, shall be submitted to and approved in writing by the Local Planning Authority. The building shall not be occupied until the works approved in accordance with this condition have been completed. Such works shall thereafter be retained.

Reason: In the interests of amenity and visual amenity in accordance with Arun Local Plan Policy GEN7.

11. No mechanical ventilation or air conditioning system or any other plant machinery shall be installed or operated for each building until details of the installation and operation of the system have been submitted to and approved in writing by the Local Planning Authority. The system shall thereafter only be installed and operated in accordance with the approved details.

Reason: In the interests of amenity in accordance with Arun Local Plan Policies GEN7, DEV26 and GEN34.

12. Prior to the commencement of development of each building, full details of the sound insulation and management measures to be incorporated into that building shall be submitted to and agreed in writing by the Local Planning Authority. The details shall highlight how future occupiers of that building will be protected from noise from other occupiers within the phase and adjacent developments and from external traffic noise. The agreed details shall be implemented prior to first occupation and be retained and maintained thereafter.

Reason: In the interests of amenity in accordance with Arun Local Plan Policies GEN7 and GEN32.

13. No external surfacing works for a building shall take place until details and samples of all surfacing materials for that building have been submitted to and approved in writing by the Local Planning Authority. The surfacing works shall be carried out in accordance with the approved materials prior to first occupation of that phase and be retained and maintained thereafter.

Reason: In the interests of visual amenity in accordance with Arun District Local Plan Policy GEN7.

14. Prior to the commencement of development of any building a CCTV strategy for that building (to include details of the location cameras and type of system) shall be submitted to and approved in writing by the Local Planning Authority. The agreed details shall be implemented prior to first occupation of that phase and be retained and maintained as such thereafter unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interests of public safety in accordance with adopted Arun Local Plan Policy GEN7.

15. The development shall be carried out to generally accord with the UK Police 'Secured by Design' and Crime Prevention through Environmental Design (CPTED) principles.

Reason: In the interests of public safety in accordance with Arun District Local Plan Policy GEN7.

16. Prior to the commencement of construction of a phase, written evidence will be submitted to and approved in writing by the Local Planning Authority that the development is registered with a BREEAM certification body and a pre-assessment report (or a design stage certificate with interim rating if available) has been submitted indicating that the development can achieve the BREEAM level "Very Good". The documentation will include an energy plan showing that a minimum of 10 percent of on-site energy will be produced by low and zero carbon technologies. The statement shall be approved by the Local Planning Authority and the building should be constructed in accordance with the detailed scheme.

Prior to the occupation of each phase of the development a post construction review statement for that phase shall be submitted by the applicant including a BRE certified BREEAM final assessment and associated paper work and approved in writing by the Local Planning Authority.

Reason: To reduce carbon dioxide and other greenhouse gas emissions and adapt to climate change in accordance with Policy GEN21 of the adopted Arun District Local Plan.

17. Prior to the commencement of development for a phase an Ecological Protection & Enhancement Plan for that phase shall be submitted to and agreed in writing by the Local Planning Authority. The Plan shall be based on the mitigation measures proposed in Section 6 of the Ecological Appraisal dated June 2013 and Section 4.0 of Additional Protected Species Surveys dated November 2013 prepared by Aluco Ecology and will include a programme of ecological monitoring to inform the long-term management of the site. The Plan will include an Annual Work Programme with clear timelines for each mitigation measure to be carried out for the upcoming 12-month period. The mitigation measures shall be implemented in accordance with the timescales set out in the agreed plan.

Reason: To ensure the protection and retention of biodiversity in accordance with Arun District Local Plan Policy GEN29.

18. No removal of any trees, shrubs or other vegetation that could contain an active bird nest shall be carried out during the period 1 March to 31 August inclusive unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure the protection of wild birds during the breeding season in accordance with Arun District Local Plan Policy GEN29.

19. Development of a phase shall not commence until full details of both hard and soft landscape works, including an implementation programme, have been submitted to and approved in writing by the Local Planning Authority. Hard landscape works shall include:

- (a) proposed finished levels and/or contours,
- (b) boundary details and means of enclosure,
- (c) car parking layouts,
- (d) other vehicle and pedestrian access and circulation areas,
- (e) hard surfacing areas,
- (f) minor artefacts and structures (e.g. furniture, play equipment, refuse or other storage units, signs, lighting etc.),
- (g) proposed and existing functional services above and below ground (e.g. drainage, power cables, communication cables, pipelines etc., indicating lines, manholes, supports etc.). Soft landscape works shall include
- (h) planting plans
- (i) written specifications (including soil depths, cultivation and other operations associated with plant and grass establishment) and
- j) schedules of plants noting species, planting sizes and proposed numbers/densities.

All hard and soft landscaping works shall be carried out in accordance with the approved details, approved implementation programme and British Standard BS 4428:1989 Code of Practice for General Landscape Operations. The developer shall complete the approved landscaping works and confirm this in writing to the Local Planning Authority prior to the date agreed in the implementation programme.

Reason: To ensure the provision and establishment of acceptable landscape in accordance with adopted Arun Local Plan Policies GEN7.

20. Development of a phase shall not commence until details of the cycle/motorcycle parking and facilities for that phase have been submitted to and approved in writing by the Local Planning Authority. Details shall include the method of securing the cycles and motorcycles and their location, provision of showers and storage lockers and identify which building the parking facilities relate to. The approved cycle/motorcycle parking and facilities associated with each building within the phase shall be provided prior to occupation of that building of development and thereafter be retained for the

lifetime of the development.

Reason: In order to meet the aims of adopted Arun Local Plan Policy GEN15 and to encourage sustainable access.

21. No building shall be occupied until all areas shown on the approved plans to be used by vehicles accessing that building have been fully laid out, surfaced and drained such that surface water does not discharge or transfer onto the highway. These areas shall not be used for any other purpose thereafter.

Reason: To ensure the free and safe use of the highway in accordance with adopted Arun District Local Plan Policy GEN8.

22. Prior to the commencement of development of a phase full details of the location and number of parking spaces allocated to and associated with each building within that phase plus details of any car share spaces and charging to be introduced shall be submitted to and agreed in writing by the Local Planning Authority. The parking spaces for each building shall be introduced as agreed prior to first occupation of that building and be retained and maintained as such thereafter unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure appropriate parking is provided across the development in accordance with Arun District Local Plan Policy GEN12.

23. Prior to the commencement of development a programme of archaeological work including a Written Scheme of Investigation shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include an assessment of significance and research questions; and:

1. The programme and methodology of site investigation and recording.
2. The programme for post investigation assessment.
3. Provision to be made for analysis of the site investigation and recording.
4. Provision to be made for publication and dissemination of the analysis and records of the site investigation.
5. Provision to be made for archive deposition of the analysis and records of the site investigation.
6. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

No development shall take place other than in accordance with the Written Scheme of Investigation approved under this condition and the development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.

Reason: To ensure appropriate archaeological recording in accordance with adopted Arun District Local Plan Policies AREA 15 and AREA 16.

24. No development hereby permitted shall commence until a scheme to provide compensatory flood storage has been submitted to, and approved in writing by, the Local Planning Authority. The scheme shall include:

- Amendments to the current provision (as set out in the submitted FRA, 13/0404/4692) to reflect as far as possible the impact of any changes in modelled levels as a result of updated modelling (where available).

The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme

Reason: To prevent flooding to the site and elsewhere by ensuring that compensatory storage of flood water based on the best information available is provided in accordance with the NPPF.

25. No development of each phase shall take place until a surface water drainage scheme for the phase, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the Local Planning Authority. The drainage strategy should:

- Demonstrate the surface water run-off generated up to and including the 1 in 100 year plus 30% for climate change critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall event (as stated within the approved FRA ref: 13/0404/4692) .
- Consider pollution prevention measures.

The design should follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, the recommendations of the SUDS Manual produced by CIRIA.

Winter groundwater monitoring to establish highest annual ground water levels and Percolation testing to BRE 365, or similar approved, will be required to support the design of any Infiltration drainage in the event that any infiltration drainage is included within an approved scheme or schemes.

No building shall be occupied until the complete surface water drainage system serving the phase within which that building is situated has been implemented in accordance with the agreed details (which may be revised from time to time with the written approval of the Planning Authority).

Reason: To prevent an increased risk of flooding, both on and off site and to prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution in accordance with the NPPF.

26. No development approved by this planning permission shall take place until a remediation strategy that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the Local Planning Authority:

1. A site investigation scheme, based on the Desk Study Review and Preliminary Ground Appraisal letter report to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
2. The results of the site investigation and the detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken and a programme for their implementation.
3. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express written consent of the local planning authority.

The scheme shall be implemented as approved.

Reason: To prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution in accordance with the NPPF.

The site lies above the Lewes Nodular Chalk which is designated a Principal Aquifer. Contamination may be present at the site as a result of its historical use(s). Any contamination present may pose a risk to groundwater underlying the site and potable supplies.

27. No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of any works required to be completed in connection with that part of the development as set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: To prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution in accordance with the NPPF.

The site lies above the Lewes Nodular Chalk which is designated a Principal Aquifer. Contamination may be present at the site as a result of its historical uses. Any contamination present may pose a risk to groundwater underlying the site and potable supplies.

28. If, during development, contamination not previously identified is found to be present at the site then no further development within the affected area (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reason: To prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution in accordance with the NPPF.

The site lies above the Lewes Nodular Chalk which is designated a Principal Aquifer. Contamination may be present at the site as a result of its historical use(s). Any contamination present may pose a risk to groundwater underlying the site and potable supplies.

29. No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. In the event that such consent is sought and given by the Local Planning Authority the development shall be carried out in accordance with the approved details.

Reason: To prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution in

accordance with the NPPF.

The site lies above the Lewes Nodular Chalk which is designated a Principal Aquifer. Contamination may be present at the site as a result of its historical use(s). Any contamination present may pose a risk to groundwater underlying the site and potable supplies.

30. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: To prevent development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution in accordance with the NPPF.

Piling or any other foundation designs using penetrative methods can result in risks to potable supplies from, for example, pollution / turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. It should be demonstrated that any proposed piling will not result in contamination of groundwater.

31. Unless otherwise agreed in writing by the Local Planning Authority or it is agreed between the applicants and the Local Planning Authority that no oil interceptors are required in that phase no development in a phase shall take place until a plan showing details of any oil interceptor required for that phase has been submitted to and approved in writing by the Local Planning Authority. Such oil interceptor as may be approved shall be designed to intercept all surface water from areas to be used by vehicles and any other areas likely to be subject to contamination. The phase shall not be brought into use until the oil interceptor has been provided, and it shall thereafter be retained and maintained in a satisfactory condition. Roof drainage should not be passed through an oil interceptor.

Reason: To prevent pollution of the any watercourse and protect the environment in accordance with Arun District Local Plan policies GEN7 and GEN33.

32. No works shall take place on a phase until details of the proposed means of foul water sewerage disposal for that phase have been submitted to, and approved in writing by the Local Planning Authority in consultation with Southern Water.

Reason: To prevent pollution of the any watercourse and protect the environment in accordance with Arun District Local Plan policies GEN7 and GEN33.

33. The development shall not proceed until formal consent has been approved in writing from the Lead Local Flood Authority (WSCC) or its agent (ADC) for the discharge of any flows to watercourses, or the culverting, diversion, infilling or obstruction of any watercourse on the site. Any discharge to a watercourse must be at a rate no greater than the pre-development run off values.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies GEN7 and GEN9 of the Arun District Council Local Plan.

34. Development shall not commence until full details of the proposed maintenance and management of the SUDs system for each phase is set out in a site-specific maintenance manual and submitted to, and approved in writing, by the Local Planning Authority. The manual is to include details of financial management and arrangements for the replacement of major components at the end of the manufacturers

recommended design life. Upon completed construction of the SUDs System, the owner or management company shall strictly adhere to and implement the recommendations contained within the manual.

Reason: To ensure the efficient maintenance and on-going operation of the SUDs system and to ensure the best practice in line with guidance set out in 'The SUDs Manual' CIRIA publication ref: C697 Chapter 22.

35. The development layout shall not be agreed until such time that arrangements for the future access and maintenance of any watercourse or culvert (piped watercourse) crossing or abutting the site has been submitted and approved in writing by the Local Planning Authority.

No construction is permitted, which will restrict current and future land owners from undertaking their riparian maintenance responsibilities of any watercourse on or adjacent to the site.

Reason: To ensure that the duties and responsibilities, as required under the Land Drainage Act 1991, and amended by the Flood and Water Management Act 2010, can be fulfilled without additional impediment following the development completion.

36. Prior to the occupation of a phase, a scheme detailing the method of storage and disposal of litter and waste materials, including recycling facilities for that phase, shall be submitted to and approved in writing by the Local Planning Authority. The details shall include a description of the facilities to be provided including, where appropriate, lockable containers and details for how the recyclable materials will be collected from the site with timescales for collection.

The approved scheme shall be implemented before the development hereby permitted is brought into use and no waste or litter shall be stored or disposed of other than in accordance with the approved scheme.

Reason: In the interests of amenity and to promote recycling in accordance with adopted Local Plan Policy GEN7.

37. No development shall commence until the vehicular access serving the development has been constructed in accordance with the approved planning drawing.

Reason: In the interests of road safety.

38. No part of the development shall be first occupied until provision has been made within the site in accordance with plans and details to be submitted to and approved by the Local Planning Authority to prevent surface water from that part of the development draining onto the public highway.

Reason: In the interests of road safety.

39. No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters:

- the anticipated number, frequency and types of vehicles used during construction,
- the method of access and routing of vehicles during construction,
- the parking of vehicles by site operatives and visitors,
- the loading and unloading of plant, materials and waste,

- the storage of plant and materials used in construction of the development,
- the erection and maintenance of security hoarding,
- the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
- measures to control the emission of dust and dirt during demolition and construction, lighting for construction and security,
- details of public engagement both prior to and during construction works.

Reason: In the interests of highway safety and the amenities of the area.

40. No part of the development shall be first occupied until a Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall be completed in accordance with the latest guidance and good practice documentation as published by the Department for Transport or as advised by the Highway Authority.

Reason: To encourage and promote sustainable transport.

41. No building [within Phase 1B] forming part of the development approved shall be occupied until the applicant has secured the provision (or entered into the requisite agreements with the local highway authority under the Highways Act 1980 (or such other legislation as may be applicable) to for two dropped kerbs at the bus stop crossing located to the east of Markfield as identified within paragraph 2.7.3 of Non-Motorised User Audit (Reference MJA Engineers - 13/0531/4692) dated 6th September 2013, and in accordance with a scheme of details submitted to and approved in writing by the Local Planning Authority in consultation with the local highway authority.

Reason: To secure the timely delivery of works as required by West Sussex County Council in the interests of Highway and Pedestrian Safety.

42. Demolition and construction works shall not take place outside 08.00 hours to 18.30 hours Mondays to Fridays and 08.00 hours to 13.30 hours on Saturday. There will be no construction on Sundays or Bank Holidays unless agreed in writing with the Local Planning Authority.

Reason: To safeguard the residential amenity of the area in accordance with the Arun District Local Plan.

43. Notwithstanding the provision of Section 55 of the Town and Country Planning Act 1990 (or any Act revoking and re-enacting that Act with or without modification) a maximum of two non-food bulky goods retail units will have a gross internal area of greater than or equal to 600 sqm. All other non-food bulky goods units will have a minimum gross internal area equal to or greater than 929 m².

Reason: As these figures reflect the retail assessment carried out and to protect the vitality and viability of designated local centres in accordance with Policies DEV26 and DEV27 of the Arun District Local Plan 2003.

44. Notwithstanding the provision of Section 55 of the Town and Country Planning Act 1990 (or any Act revoking and re-enacting that Act with or without modification) a maximum of two sui generis car sales units will be provided on the site.

Reason: As these figures reflect the retail assessment carried out and to accord with the stated intentions of the applicants.

45. No more than 7 units in use classes B8 up to 1,858 sqm Gross Internal Area (GIA) with ancillary trade counters not exceeding 10% of the ground floor GIA.

Reason: As these figures reflect the retail assessment carried out and to protect the vitality and viability of designated local centres in accordance with Policies DEV26 and DEV27 of the Arun District Local Plan 2003.

46. Notwithstanding the provision of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking or re-enacting that Order with or without modification) planning permission shall be obtained before any change of use of the B8 Trade Counters referred to in this permission, to any use within Use Class A1 as detailed in the Town & Country Planning (Use Classes) Order 2010 (or any Order revoking or re-enacting that Order with or without modification).

Reason: In order that the Local Planning Authority can retain control over further uses which it considers could be harmful to the vitality and viability of the designated centres in accordance with adopted Arun Local Plan Policies DEV26 and DEV27.

47. The retail floor space hereby permitted, falling within Class A1 of the Town & Country Planning (Use Classes) Order 1987 or in any provision equivalent to that Class in any statutory instrument revoking or re-enacting that Order with or without modification, shall not be used for the sale of goods other than:

- DIY and/or garden goods;
- Household furniture, furnishings and textiles;
- Kitchen furniture and kitchenware;
- Electronic goods;
- Carpets, wall and floor coverings;
- Automotive accessories and bicycles;
- Leisure goods;
- Camping goods;
- Pets and pet supplies;
- Office furniture and supplies; and
- Arts and craft materials and supplies

And shall not be used for any other purpose within Class A1 of the Town & Country Planning (Use Classes) Order 1987 or in any provision equivalent to that Class in any statutory instrument revoking or re-enacting that Order with or without modification.

Reason: To reduce the potential impact upon Bognor Regis Town Centre and to prevent non-bulky goods retailers locating at Oldlands Farm that the Council would prefer to see located within the Town Centre in accordance with adopted Local Plan Policies DEV26 and DEV27.

48. The applicants shall not occupy or permit occupation of more than 50% of the approved non B1, B2 and B8 class floor space within Phase 1a until the following infrastructure services and preparatory works to enable/facilitate the development of Phase 1b have been carried out in accordance with the details approved by the Local Planning Authority under the relevant conditions on this permission:

(i) Any archaeological investigations and assessments required in relation to Phase 1b in accordance with condition 23.

(ii) Any investigations or remediation works required in relation to Phase 1b in accordance with condition [26] as verified through a verification report in accordance with condition 27.

(iii) Such works as are required within Phase 1a to provide foul drainage infrastructure with sufficient capacity to accommodate the proposed development on Phase 1b with said infrastructure to be provided to a suitable connection point or points at or close to

the boundary of Phase 1b (locations to be agreed with the Local Planning Authority) and designed so as to allow for future connection thereto by the buildings in Phase 1b and to be carried out in accordance with details approved under Condition 32;

(iv) Such works as are required within Phase 1a to provide suitable gas, water, telephone and electrical services with sufficient capacity to accommodate the proposed development on Phase 1b with said infrastructure or service media to be provided to a suitable connection point or points at or close to the boundary of Phase 1b (locations to be agreed with the Local Planning Authority) and designed so as to allow for future connection thereto by the buildings in Phase 1b;

(v) Such works as are required to complete the internal access road connecting the main site access with Phase 1b (designed to allow connection of the internal estate roads within Phase 1b) at the boundary of Phase 1b at such point or points as are to be agreed with the local planning authority;

(vi) Such cut and fill flood mitigation earthworks as are required in relation to Phase 1b in accordance with the details approved by the Local Planning Authority pursuant to Condition [24].

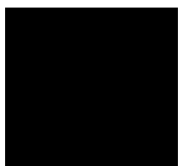
Reason: To reflect that the inclusion of potential non B1, B2 or B8 uses in Phase 1a has been allowed on the basis that it will help fund/secure the delivery of infrastructure or preparatory works required to serve the proposed employment development on Phase 1b and to ensure the timely delivery of those infrastructure or preparatory works alongside Phase 1a.

INFORMATIVE: The site incorporates/is bounded by Oldlands Farm Ditch, an Internal Drainage Board watercourse under the jurisdiction of the Environment Agency. Any works whatsoever in, over, or under the channel of this watercourse or on its banks within 5 metres from the top of the channel, would require the prior consent of the Agency under Section 23 of the Land Drainage Act 1991 and/or Byelaws.

INFORMATIVE: A formal application for connection to the public sewerage system is required in order to service this development. To initiate a sewer capacity check to identify the appropriate connection point for the development please contact Atkins Ltd, Anglo St James House, 39a Southgate Street, Winchester, SE23 9EH.

Case Officer: Cian Cronin

Date of Decision: 19th March 2014



Karl Roberts
Assistant Director Planning & Economic Regeneration

Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex BN17 5LF

IT IS IMPORTANT THAT YOU READ THE NOTES ATTACHED TO THIS DOCUMENT

NOTES RELATING TO PLANNING APPLICATION
TOWN AND COUNTRY PLANNING ACT 1990
APPEALS TO THE SECRETARY OF STATE

If you are aggrieved by the decision of your local planning authority to refuse permission for the proposed development or to grant it subject to conditions, then you can appeal to the First Secretary of State under Section 78 of the Town and Country Planning Act 1990.

If this is a decision on a planning application relating to the same or substantially the same land and development as is already the subject of an enforcement notice, and you want to appeal against your local planning authority's decision on your application, then you must do so within 28 days of the date of this notice.

If an enforcement notice is served relating to the same or substantially the same land and development as in your application and you want to appeal against your local planning authority's decision on your application, then you must do so within 28 days of the date of service of the enforcement notice, or within 6 months of the date of this notice, whichever period expires earlier.

For all other cases, if you want to appeal, then you must do so within 6 months of the date of this notice using a form which you can get from the Secretary of State at the Planning Inspectorate, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN or on line at www.planningportal.gov.uk/pcs.

If this decision is a refusal relating to a minor commercial development, where the application was made on or after 1st October 2013, please note that you must appeal within 12 weeks of the date of this notice. For a definition of minor commercial development please refer to The Town and Country Planning (Appeals) (Written Representations Procedure and Advertisements) (England) (Amendment) Regulations 2013 or contact this office for clarification.

The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.

The Secretary of State need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

In practice, the Secretary of State does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.

PURCHASE NOTICES

If either the local planning authority or the Secretary of State refused permission to develop land or grants it subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.

In these circumstances, the owner may serve a purchase notice on the Council (that is, where the land is situated in a National Park, the National Park authority for the park, or in any other case the district council in whose area the land is situated). This notice will require the Council to purchase the owner's interest in the land in accordance with the provisions of Chapter 1 of Part VI of the Town and Country Planning Act 1990.

Please note that this decision notice only relates to matters under the Planning Acts and does not give consent under any other legislation that may apply to the development. You will need to carry out your own checks to determine whether any other consents or permissions are required. For example, the Building Regulations are likely to apply to most developments, and a Highways Licence may be required from West Sussex County Council for any development within the public highway (including the placing of skips on highway land).



DOCUMENT 3

EIA SCREENING OPINION APRIL 2013 (PP REF: BE/61/13)



Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex BN17 5LF
Planning & Building Control General Enquiries

Luken Beck
30 Carlton Crescent
Southampton
SO15 2EW

Our Ref: PE/00084/13

Your ref: CJB/12002

Please ask for:
Mr C Cronin

15 April 2013

Dear Ms Bedford

Town & Country Planning Act 1990 (as amended)
Town & Country Planning (Environmental Impact Assessment) Regulations 2011
Screening Opinion

Proposed industrial and commercial development.
Land at Oldlands Farm Bognor Regis.,

The Assistant Director Planning and Economic Regeneration has determined under delegated powers that the above proposal does not require the submission of an Environmental Impact Statement, as any impacts as there are on the environment are not sufficient as to be covered by the Regulations. The following environmental issues are considered relevant to this proposal and have been considered in coming to this decision.

1. Characteristics of the Development
2. Location of the Development
3. Characteristics of Potential Impacts

The proposed site including Flood Compensation Area measures 19.27ha and is currently undeveloped agricultural land.

The proposal is considered to be Schedule 2 Development. The proposed scheme meets the description of category 10 Infrastructure Projects (a) "Industrial Estate Development Projects", as the development area exceeds 0.5 hectares.

For a development of this nature Schedule 3 of the Regulations must be taken into account. This sets out selection criteria for screening Schedule 2 development. The main criteria are the characteristics of the development, the location of development, and the characteristics of potential impacts. Annex A of Circular 02/1999 states that an EIA is more likely to be required if the site area is more than 20 hectares. An assessment of the

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likely effect of the proposed development is set out below.

1. Characteristics of the Development:

The proposed Industrial and Commercial Development is not considered to be of a size and scale of that would be unduly excessive. The proposed mix of uses including a mixed use business hub, light industry and offices, general industry, and warehousing and storage would involve the development of significant sized buildings, parking and infrastructure. The proposal would not require the use of significant natural resources or result in the production of significant quantities of pollution or waste.

2. Location of Development

The site is not located on designated land, and there are no specific ecological designations (SAC, SPA, SSSI, or Ramsar) near to the site. There are no listed buildings or conservation areas in close proximity to the site. The nearest residential property is located to the southwest of the site boundary in the Riverside Caravan Park approximately 620 metres away.

It is therefore considered that the development is not particularly sensitive or in a vulnerable location.

3. Characteristics of Potential Impacts

There are numerous potential impacts from the proposal including visual impact, traffic and transport, contamination, noise, heritage, water and ecological impacts. However, it is not considered that the characteristics of potential impacts are such that they will have significant effects on the environment that could not be assessed through a planning application.

As such it is considered that the proposed development does not constitute EIA development and an Environmental Statement is not required to be submitted with any application for planning permission.

Yours sincerely



Karl Roberts
Assistant Director Planning Services &
Housing Strategy

peslet4



**TOWN AND COUNTRY PLANNING
(ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2011**

Application Number: PE/00084/13

Description: Proposed industrial and commercial development.

Date submitted: 07 March 2013

Assessment: **This proposal does not require the submission of an Environmental Impact Statement because of the following reasons:**

Schedule 2 Development: The application falls within schedule 2 of the Town and Country Planning (Environmental Impact Assessment) regulations 2011 and could have the potential to impact on the environment in such a manner as is covered by these regulations. The following environmental issues are considered to be relevant to this proposal and have been considered in coming to this decision:

1. Characteristics of the Development
2. Location of the Development
3. Characteristics of Potential Impacts

The proposed site including Flood Compensation Area measures 19.27ha and is currently undeveloped agricultural land.

The proposal is considered to be Schedule 2 Development. The proposed scheme meets the description of category 10 Infrastructure Projects (a) "Industrial Estate Development Projects", as the development area exceed 0.5 hectares.

For a development of this nature Schedule 3 of the Regulations must be taken into account. This sets out selection criteria for screening Schedule 2 development. The main criteria are the characteristics of the development, the location of development, and the characteristics of potential impacts. Annex A of Circular 02/1999 states that and EIA is more likely to be required if the site area is more than 20 hectares. An assessment of the likely effect of the proposed development is set out below.

1. Characteristics of the Development:

The proposed Industrial and Commercial Development is not considered to be of a size and scale of that would be unduly excessive. The proposed mix of uses including a mixed use business hub, light industry and officers, general industry, and warehousing and storage would involve the development of significant sized buildings, parking and infrastructure. The

proposal would not require the use of significant natural resources or result in the production of significant quantities of pollution or waste.

2. Location of Development

The site is not located on designated land, and there are no specific ecological designations (SAC, SPA, SSSI. or Ramsar) near to the site. There are no listed buildings or conservation areas in close proximity to the site. The nearest residential property is located to the southwest of the site boundary in the Riverside Caravan Park approximately 620 metres away.

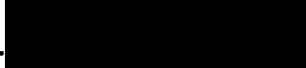
It is therefore considered that the development is not particularly sensitive or in a vulnerable location.

3. Characteristics of Potential Impacts

There are numerous potential impacts from the proposal including visual impact, traffic and transport, contamination, noise, heritage, water and ecological impacts. However, it is not considered that the characteristics of potential impacts are such that they will have significant effects on the environment that could not be assessed through a planning application.

As such it is considered that the proposed development does not constitute EIA development and an Environmental Statement is not required to be submitted with any application for planning permission.

Legal Opinion sought: YES / NO

Signed: ..  ..

Co Signed:

Date: 16 / 4 / 12

Letter sent to applicant

eisregp



Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex BN17 5LF
Planning & Building Control General Enquiries

Luken Beck
30 Carlton Crescent
Southampton
SO15 2EW

Our Ref: PE/00084/13
Your Ref: CJB/12002
Please ask for:
Mr C Cronin
13 March 2013

Dear Ms Bedford

Town & Country Planning Act 1990 (as amended)
Town & Country Planning (Environmental Impact Assessment) Regulations 2011
Screening Opinion Request

Proposed industrial and commercial development.
Land at Oldlands Farm Bognor Regis.,

Thank you for your request for a screening opinion which was received on 07 March 2013. This matter is being dealt with by Mr C Cronin.

You should receive a formal response within 3 weeks of the date of receipt unless it has been mutually agreed to extend the time scale.

If you do not receive a screening opinion by 28 March 2013 and you have not agreed in writing to extend this time limit, you are entitled to request that the Secretary of State makes a screening direction. A request must be made in writing and be accompanied by a copy of all previous documents relating to your request for a screening opinion. Your request for a screening direction should be sent to Secretary of State at The Government Office of The South East, Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4GA. A copy of your request for a direction must also be forwarded to Arun District Council.

Yours sincerely

Karl Roberts
Assistant Director Planning and Economic Regeneration

peslet1



LUKEN BECK

30 Carlton Crescent, Southampton SO15 2EW
Tel: 023 8063 3440 Fax: 023 8063 3441

Mr K Roberts,
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

6th March 2013

Ref: CJB/12002

Dear Mr Roberts

**Proposed Industrial and Commercial Development: Land at Oldlands Farm, Bognor Regis.
Environmental Impact Assessment - Screening Opinion**

We have been instructed by our client to prepare and submit an Outline planning application for development of land at Oldlands Farm, Bognor Regis for mixed business uses including industrial and commercial purposes, detailed below. In this regard, I would like to formally request the local planning authority to adopt a Screening Opinion under Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011.

In accordance with the regulations (Para. 5) the submitted information includes:

- A site plan sufficient to identify the land
- A brief description of the proposed development, including a draft masterplan
- An initial assessment of the possible effects on the environment

In terms of the Screening Opinion, we are of the view that an Environmental Statement is not required in this case, as set out below.

EIA Regulations.

The Town and Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 2011 require an EIA to be carried out for a specified range of major development proposals. It classifies development into two Schedules; Schedule 1 specifically lists types of development where an EIA is mandatory whereas Schedule 2 proposals may require an EIA depending on the scale, nature and location of the proposed development.

This proposal does not fall within any of the categories listed in **Schedule 1** and is not therefore Schedule 1 development.

Schedule 2 of the Regulations sets out the descriptions of development and applicable thresholds and criteria for the purpose of classifying development as Schedule 2 development. The current proposed scheme should be screened under category 10 Infrastructure Projects (a) Industrial estate development projects, the development area exceeding 0.5 hectares.



RTPI

mediation of space · making of place

Chartered Town Planners

Luken Beck mdp Ltd.

Directors: Graham Beck JP, M.B.A., LL.B. (Hons), B.A. (Hons), Dip.T.P., M.R.T.P.I., M.C.M.I.
Mark Luken M.B.A., B.Sc. (Econ) (Hons), Dip.T.P., M.R.T.P.I., M.C.M.I.

Company registered in England & Wales No. 7548836

VAT Registration No. 110257563



Furthermore, we have considered **Schedule 3** of the Regulations, which must be taken into account in any screening decision, concerning *Selection Criteria for Screening Schedule 2 Development*. The main criteria are the characteristics of the development, including size, the location of development in terms of the sensitivity of the area affected, and the characteristics of potential impact including its extent, magnitude and complexity.

The site is not a 'sensitive area' as defined in **Regulation 2 (1)**, namely.

- a) Land notified under section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981;
- b) A National Park within the meaning of the National Parks and Access to the Countryside Act 1949;
- c) The Broads;
- d) A property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention for the Protection of the World Cultural and Natural Heritage;
- e) A Scheduled Monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979;
- f) An Area of Outstanding Natural Beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000;
- g) A European Site within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2010.

Therefore, the proposed development will not have an unacceptable impact on any sensitive area and, in terms of that criteria, will not require an EIA.

Furthermore, we have considered **Circular 02/99 Annex A** referring to '*Indicative Thresholds and Criteria for Identification of Schedule 2 Development Requiring EIA*'. The Circular indicates that EIA may be required depending on the physical scale of such developments and the potential increase in traffic, emissions and noise. In particular it says (Para A17) that an EIA is more likely to be required if the site area of the new development is more than 20 hectares.

Therefore, the character of the proposed development, in terms of its nature, scale and complexity, does not meet the criteria as Schedule 2 development requiring an EIA.

Also, para 38 of the Circular reiterates that, for any Schedule 2 development, an EIA is more likely to be required if it would be likely to have significant effects on the special character of any of the types of 'sensitive area' (see above).

Overall, when considered against all the criteria and thresholds, the proposed development is not a major development of more than local importance, is not located in a sensitive area, and is not unusually complex with potentially hazardous environmental effects. More specifically, the proposed development is not listed in Schedule 2, does not exceed any of the thresholds and criteria relevant to Schedule 2, and so does not constitute Schedule 2 development.

Accordingly, the development is outside the scope of the Regulations, is not EIA development, and therefore a formal Environmental Statement is not required to support any planning application.



This letter provides the necessary information for the LPA to adopt a Screening Opinion.

The Site

The proposal site at Oldlands Farm is a greenfield site lying on the northern side of Bognor Regis as shown on the submitted location plan. It is part of a wider allocated area of 23ha with this proposal relating to an area of approximately 11 hectares. The land is currently in agricultural use. It lies adjacent to the east of the existing A29, south east of the new Bognor Regis Relief Road and to the north-east of the A29 Shripney Road/Rowan Way/Steyning Way roundabout. It is bounded to the south by the Southern Cross Industrial Estate, an existing industrial and retail area. Generally, it is a level site with a gradual slope down to the east.

The site is not within the South Downs National Park nor does it lie within any defined area of specific conservation designation.

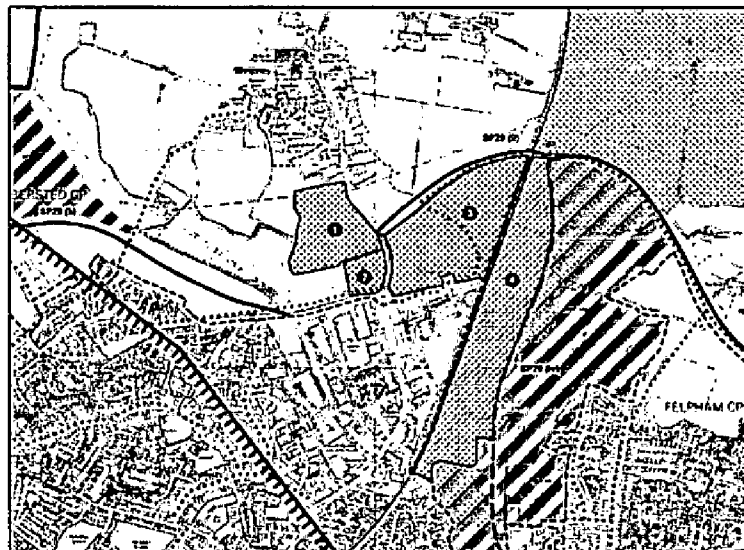
Existing Situation

Oldlands Farm has been allocated for development for some considerable time, but has not yet been successfully brought forward for employment use.

Local Plan 2003: The site is shown as Site 5 on the proposals maps for Commercial development. The site also includes part of Site 6 which states that in order to contribute to the regeneration of Bognor Regis, 11.25 ha is allocated for a Business Park land uses within Class B1, B2 and B8 with a further 11.8 ha reserved as an extension to the Business Park (Site 6, to the east).

Part of the wider site (3.45 ha) on its western side has been purchased by Asda which was refused outline planning permission for retail use.

The site continues to be allocated in the Draft Local plan 2013-28 as Oldlands Farm Strategic Employment site 3 for B1(c) and B2 uses only. An extract from the key diagram/proposals map is shown below:



A recent feasibility and viability assessment undertaken on behalf of the Council states that 'a proposal for the site that actively targets just one sector or development type is less likely to be successful than one that seeks a range of uses and is flexible to future demand'. The development of the site would make a major contribution to achieving its economic growth objectives.



Proposed Development.

The proposal is for mixed uses comprising industrial and commercial uses, amounting to a maximum of 50,000 sq m, as follows:

Mixed Use Business Hub (Use Class A1, A3, A4, A5, C1, Sui generis); Light industry and offices (Use Class B1a, b, c), General Industry (Use Class B2) and Warehousing and Storage (Use Class B8).

Flexibility of use is key to the future of this site in terms of the viability of the proposals.

Planning Issues:

To consider the impact of the proposals on the environment, initial technical work has already been undertaken. The attachments to this letter, on the enclosed disc, expand on the main planning considerations and include:

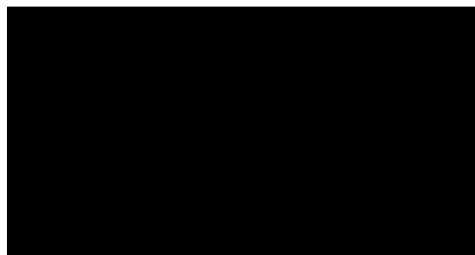
- a summary of the baseline work undertaken to date;
- outlines the remaining survey work to be undertaken and reports that will be submitted with the planning application;
- the likely impacts (known and unknown) of the development, and,
- whether any significant impacts will arise and the effectiveness of known mitigation measures.

The main considerations are:

- Flood Risk Assessment [including Ground and Surface water drainage]
- Ecology
- Tree Survey & Landscape Assessment
- Transport Assessment
- Archaeological Desk Top Report
- Contamination & Groundwater Mitigation Report
- Noise

I trust you have sufficient information upon which to make a judgement with regard to the need to adopt a Screening Opinion for an EIA for the proposed redevelopment of this site. Should you require any further clarification, please call Graham Beck or myself.

Yours sincerely



Encl: disc







**OLDLANDS FARM,
TO THE NORTH OF SOUTHERN CROSS
INDUSTRIAL ESTATE,
BOGNOR REGIS,
WEST SUSSEX**

**INTERIM APPRAISAL
FEBRUARY 2013**

MJA Consulting
Consulting Engineers
58-62 Ock Street
Abingdon
Oxon
OX14 5BZ



Hanbury Properties Ltd

**WL/13:0103/4692
FEBRUARY 2013**

1.0 SYNOPSIS

- 1.01 The initial scope of work in terms of traffic and transport focused on the capacity of the newly constructed A29 Shripney Road/BNRR/Site access roundabout. The brief was to produce a table to assist the developer in choosing the final uses at the Oldlands Farm site.
- 1.02 From the work previously undertaken within the 2004 Transport Assessment (TA) for the Site 6, Felpham scheme it was understood that the traffic generation for circa 38,000sqm GFA office use was accepted by the local authority. The capacity modelling carried out for the BNRR roundabout indicated that the junction would operate at/close to its capacity in a future year of 2011. The capacity modelling was revisited by MJA, where a number of errors were realised and corrected. Also the geometries for the as-built roundabout were used for the updated modelling, which used a future year of 2017. It was revealed that an approximately 125 two-way trips could be added to the highway network, assuming office use.
- 1.03 Following this initial work MJA were instructed to consider the highway impact at the A29 Shripney Road/Steyning Way/Rowan Way roundabout, where a number of trips were identified to be arriving/departing to from the site. The Site 6, Felpham TA indicated that the Rowan Way roundabout would experience significant queuing on the Rowan Way arm when Site 6 was fully built out, nonetheless this was accepted by the local authority..
- 1.04 MJA carried out remodelling of the Rowan Way roundabout which incorporated the assumed additional 125 two-way trips, minor geometric changes to the roundabout and a future year of 2017. The results of the capacity modelling reflected the original modelling outputs i.e. significant queuing and capacity issues at the Rowan Way arm.
- 1.05 It should be noted that base traffic flows for the above modelling was taken from the 2004 TA and factored using DfT data to reflect the change in overall traffic volumes in the local area.
- 1.06 New traffic counts were undertaken at the Rowan Way roundabout in 2012, to provide more accurate flow data. This information was used then used to update the capacity models for both roundabouts. The latest re-running of the capacity models indicated that the BNRR roundabout could accommodate an additional 150 two-way trips, assuming an office development at Oldlands Farm. These extra trips could also be accommodated by the Rowan Way roundabout. The additional trips equate to office floor area of circa 8,000sqm, hence Oldlands Farm could develop a total of 46,000sqm GFA of office use (space and parking provision allowing). The capacity modelling results are set out in the MJA Transportation Appraisal (WL/12:0577/4692).
- 1.07 A full Transport Assessment and Framework Travel Plan will be produced to accompany the outline planning application.

2.0 SITE ACCESS

- 2.0.1 Access to the site is via a dedicated arm off the A29 Shripney Road/BNRR/Site access roundabout. This is a large 60m ICD roundabout, which has been recently constructed as part of the BNRR route and to serve Site 6 development. The access arm has a total width of 9.7m and full visibility is achievable at the roundabout.
- 2.0.2 To the north of the BNRR roundabout the A29 routes to Shripney and continues to the A27. To the east of the roundabout the BNRR serves Site 6 and connects with the A259 towards Littlehampton. To the south of the roundabout the A29 connects with the Rowan Way roundabout before continuing towards South Bersted and Bognor Regis.

3.0 HIGHWAYS

- 3.0.1 The A29 Shripney Road routes in a north-south direction to provide a connection between the A27 and the A259 at South Bersted. In the vicinity of the site, the A29 is dual carriageway and currently subject to a speed limit of 50mph. The Site 6 scheme recognised the existence of many differing speed limits in the area, in addition to a change in the nature of the use of the A29. WSCC has recently approved a reduction in the speed limit to 40mph along the A29, which will provide consistency in the area and prevent continual changing of speeds along the A29 along with safety and environmental benefits.

4.0 SUSTAINABILITY

- 4.0.1 The village of Shripney is located less than 1km north of the Oldlands Farm site. South Bersted is under 2km south of the site, whilst Bognor Regis Town Centre is approximately a further 1km to the south. North Bersted is around 2.5km to the west of Oldlands Farm, whilst the Site 6 housing is will be around 2km east of Oldlands Farm.
- 4.0.2 A footpath exists on the western side of Shripney Road, which provides a continuous pedestrian link between Shripney and Bognor Regis. The section of footpath between the site and the Rowan Way roundabout will be improved and to provide a wide footway/cycleway. Crossing points have been provided at the BNRR roundabout (across the site access and the A29 (s) arms). In conjunction with the imminent speed limit reduction along the A29, crossing points will enable pedestrians and cyclist to access the wide footway/cycleway.
- 4.0.3 The BNRR will include a wide footway/cycleway along its southern side, for its entire length. The footway/cycleway will also run into the Site 6 housing area to provide a comprehensive pedestrian/cycle link between the A259/Site 6 and Oldlands Farm.
- 4.0.4 To the south of the Rowan Way roundabout footway/cycleways are provided on both sides of the A29 Shripney Road, leading to South Bersted and Bognor Regis.

- 4.0.5 A regular bus service (Stagecoach 66/66A) operates along the A29. The closest bus stops are located around 350m and 400m to the south of the site. These bus shelters provide timetable information for passengers.
- 4.0.6 Bognor Regis Railway Station is located around 2.6km south of the site. Whilst this distance is further than the generally recommended walking distance, the railway station is accessible via the Stagecoach 66 service. Bus stops are located directly outside the railway station and the journey takes approximately 13 minutes from the stops mentioned above.
- 4.0.7 There are numerous local amenities and facilities within a 2km walking distance of the site. The closest being the Bognor Regis Retail Park include, where a range of retail opportunities, including food, are available. Adjacent to this is the Arun Retail Park, where further retail opportunities exist. A large Sainsbury supermarket has recently opened and is located opposite Arun Retail Park, approximately 800m south of Oldlands Farm.
- 4.0.8 From the above, it is considered that the Oldlands Farm site is situated within walking distance of numerous amenities and is accessible via a range of sustainable modes.

5.0 HIGHWAY IMPACT

- 5.0.1 As part of the Site 6, Felpham scheme a Transport Assessment (TA) was produced by Borehams Consulting Engineers (BCE), which considered Oldlands Farm to have a 9.5ha area and, for the purpose of determining its maximum traffic generation, assumed it would provide B1 office uses. Consequently, 38,000sqm (40% of 9.5ha) of floor space was assumed in the TA. This resulted in two-way trips in the order of 650 and 730 for the AM and PM peak periods. The future year base traffic flows were derived from traffic counts (2003) and Temprow growth factors. Trip distribution splits were agreed with the highway authority and applied to the trips generated by the assumed office development in order to show the proposed future year traffic flows when the BNRR was completed.
- 5.0.2 Capacity modelling for junctions on the highway network included the A29 Shripney Road/BNRR/Site access & the A29 Shripney Road/Steyning Way/Rowan Way roundabouts, which predicted that the junctions would operate close to/over capacity. It is understood that the parameters used in the modelling were taken from preliminary junction layouts. The highway authority accepted the traffic modelling and the highway impact of the development.
- 5.0.3 Recent traffic counts have been carried out in the vicinity of the site in order to update the traffic information. The results of the surveys revealed that traffic levels have not increased since the original traffic surveys were conducted, suggesting 'flat growth' rather than that expected from Temprow growth. It should be noted that at the time of the recent traffic surveys (2012) a significant number of the Site 6 houses were built and would be included within the surveys.

- 5.0.4 The junction capacity models have been updated using as-built geometries and utilise the current traffic data. The results of the latest capacity modelling suggest that (as expected) an office development (38,000sqm GFA) could be accommodated satisfactorily by the above junctions.
- 5.0.5 Sensitivity tests were also undertaken, where additional traffic was applied to the highway network. The results of the sensitivity testing showed that an additional 150 two-way trips during each peak hour could be accommodated satisfactorily by the above junctions. The modelling considered 800 and 880 two-way trips during the AM and PM peaks. This equates approximately to an additional office space of 8,000sqm GFA at Oldlands Farm.
- 5.0.6 It should be noted that all traffic calculations have been undertaken in-line with previous work for Site 6, Felpham i.e. assumed office use at Oldlands Farm in order to determine worst-case scenario during AM and PM peak hours. Traffic generations for other uses will produce different traffic patterns at different times of the day.

6.0 Highway Safety

- 6.0.1 Following a review of the past 5-year accident records it is concluded that there were no clusters of accidents or patterns of similar accidents recorded in the area. The majority of incidents were due to driver/rider error and injudicious action such as failing to give-way and travelling too fast for conditions.
- 6.0.2 All the accidents recorded precede construction of the BNRR roundabout. Along with this new roundabout, which will bisect the A29 Shripney Road section, the imminent reduction in speed limit will help to reduce the incidence of accidents in the area.





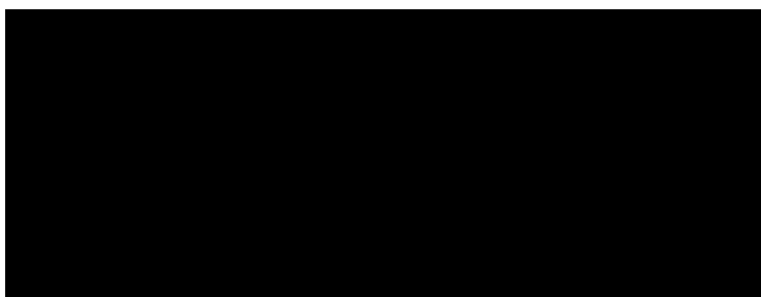
HANBURY PROPERTIES LTD

EIA Screening Opinion Request

Proposed development of an employment park at Oldlands, Rowan Way, Bognor Regis for a Mixed Use Business Hub (Use Class A1, A3, A4, A5, C1, Sui generis); Light industry and offices (Use Class B1a, b, c), General Industry (Use Class B2) and Warehousing and Storage (Use Class B8).

Supporting Information

March 2013



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Appendix 1 –

Fig 1 Planning Application Boundary

Appendix 2 –

Fig 2 – Development Framework Plan

Appendix 3

Interim Highway Appraisal - MJA Consulting

Appendix 4

Ecology Appraisal – Aluco Ecology

1. INTRODUCTION

1.1 Purpose of this Report

This report supports Hanbury Properties request to Arun District Council (The Council) as Local Planning Authority (LPA) for a screening opinion to determine whether Environmental Impact Assessment (EIA) of the proposed development should be undertaken.

The planning application is made by Hanbury Properties Ltd and is an outline planning application for 10.35 hectares (ha) of development on part of the allocated employment land identified in the 2003 Local Plan as Site 5. It also includes 4.61 ha of the neighbouring site 6 which is identified as a reserve employment site in the extant Local Plan and included for employment in the Draft Local Plan to 2028.

An additional 6.78ha of land that lies to the north of the Bognor Northern Relief Road is required for flood compensation due to raising eastern parts of the development area out of the floodplain.

The total area of the planning application site is therefore 19.27 ha (47.62 acres) and shown on Fig 1 at Appendix 1.

The site is located in a sustainable location on the northern fringes of Bognor Regis. The village of Shripney is located less than 1km north of the Oldlands Farm site. South Bersted is under 2km south of the site, whilst Bognor Regis Town Centre is approximately a further 1km to the south. North Bersted is around 2.5km to the west of Oldlands Farm. Oldlands Industrial Estate immediately adjoins the south boundary and is an established and successful employment area.

This report provides information to the Council to enable it to determine whether an EIA would be required as part of the planning application process.

1.2 Hanbury Properties Ltd

Hanbury Properties are a local development company based in Chichester, West Sussex.

Hanbury Properties specialise in delivering property development opportunities, and have the expertise, under pinned by long term Investment decisions supported by prudent financial commitments to realise this opportunity.

1.3 Possible Requirement for an EIA

The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 interpret EU Directive 97/11 on EIA and set out how Planning Authorities should determine applications taking proper account of any likely significant effects on the environment.

Projects of the types listed in Annex I to the EU Directive 97/11 must always be subject to EIA. Annex II identifies projects that may require EIA, subject to project size, nature or location being such that proposals are likely to have significant effects on the environment.

The EIA Regulations repeat the projects in Annex I and II of the EIA Directive, within Schedules 1 and 2, respectively. Policy guidance on the operation of the EIA procedure is set out in Circular 02/99.

If a project falls in a category listed in Schedule 1 of the EIA Regulations, EIA is mandatory. If it falls within Schedule 2, EIA may be required, subject to a Screening Process.

2. SCREENING PROCESS

2.1 Is the Proposed Development Listed in Schedule 1?

The first aspect of the EIA Screening process is to determine whether the proposed project falls within Schedule 1.

There is no reference to the type of development proposed in this application within Schedule 1.

The proposed development does not fall within Schedule 1 of the EIA Directive.

Following from this, consideration of whether the proposal is listed in Schedule 2 is required.

2.2 Is the Proposed Development Listed in Schedule 2?

Schedule 2 includes the following description of possible EIA projects:

10 Infrastructure Projects	
(a) 'Industrial estate development projects	where the area of the development exceeds 0.5ha

The proposal does fall within this category of development and is therefore Schedule 2.

Circular 02/99 sets out the screening procedure required to determine whether such Schedule 2 Developments are likely to cause significant effects on the environment, by virtue of their nature, size or location, and particularly if the development is located in, or within close proximity to, a 'sensitive area'.

2.3 Is the Proposed Development in a 'Sensitive Area'?

The Regulations define environmentally 'sensitive areas' as:

- Sites of special scientific interest (SSSIs) and their consultation areas;
- International conservation sites;
- National parks (including the Broads);
- Areas of Outstanding natural beauty (AONBs);
- World heritage sites; and
- Scheduled monuments

The employment site lies more than 2km metres from the nearest SSSI. The Pagham Harbour SPA lies 5.9km south of the application site.

A single Local Nature Reserve (LNR), Berstead Brooks LNR is located to the west of the site on the far side of the A29 approximately 300m to the west of the application site. This is designated for its grazing marsh and wetland habitats alongside the Aldingbourne Rife.

From the available records and habitat information gathered during the ecological surveys there are no protected or notable species or groups of such species which may potentially occur, or are confirmed as occurring at the site. Habitats are considered negligible within the zone of influence but considered to be of value within the zone of influence for birds and badger but negligible value for bats reptiles, Amphibians and invertebrates.

While water vole are known to be present within the Bersted Brooks, LNR and alongside the Lidsey Rife as part of monitoring and mitigation for the BNRR. Both sets of survey data for these waterbodies suggests that Water Vole are still at a low population level in the local area and may be starting to re-colonise the watercourse network after a period of very low presence or absence.

No evidence of water vole has so far been recorded on the watercourse that runs to the east of the application site and on through the flood compensation area.

Survey work for Otter has not been recorded in the local area to date or within the application site.

The potential for significant adverse impact on the integrity of designated sites and associated designated interest features is considered to be **negligible**. Habitat which will be lost as a result of developing the site is predominantly arable field with Low diversity and ecological value and the effects considered **insignificant**.

Furthermore, the opportunity exists to increase the extent of and create new habitats of conservation interest including hedgerows, belts of trees and water bodies (as part of a site SUDS system). Appropriate pollution prevention controls will be adopted during the construction phase in order to avoid affecting water quality of the minor water course that drains through the north western region of the site.

The site is not within a 'sensitive area'.

As the proposed development is not within a 'sensitive area' the thresholds set out in Column 2 of Schedule 2 of the EIA Regulations are relevant in determining whether the proposal is 'Schedule 2 Development'.

2.4 Does the Proposed Development meet any of the Relevant Thresholds and Criteria in Schedule 2?

Schedule 2 includes thresholds for proposals that it lists as being potentially EIA development. If proposals exceed these thresholds they are more likely to be EIA development.

The thresholds, as set out in the EIA Regulations, for 'Industrial Estate Development' projects; are:

'the area of the development exceeds 0.5 hectare';

The proposed development will exceed 0.5ha.

Circular 02/99 states that for all Schedule 2 Development the local planning authority must make its own formal determination of whether or not EIA is required.

In general, the Secretary of State's view is that EIA is more likely to be needed for 'Schedule 2 Development' in three main types of case:

- For major developments which are of more than local importance;
- For developments which are proposed for particularly environmentally sensitive or vulnerable locations; and,
- For developments with unusually complex and potentially hazardous environmental effects

A comparison of the proposed development with each of these types of cases is provided below.

2.5 Is this a major development of more than local importance?

Annex A 'Indicative Thresholds and Criteria for Identification of Schedule 2 Development Requiring EIA' of Circular 02/99 is relevant in determining whether such 'Schedule 2 Developments' are likely to have significant effects on the environment. Paragraph A17 states:

"Industrial estates"

A17. EIA is more likely to be required if the site area of the new development is more than 20 hectares. In determining whether significant effects are likely, particular consideration should be given to the potential increase in traffic, emissions and noise".

The net employment area is 10.35 hectares and so falls under the 20 hectares threshold. The proposed development is not of National or Regional significance in terms of its scale.

The proposal is not a major development in context of the EIA Regulations

2.6 Is this a sensitive or vulnerable location?

Public Inquiries and Hearings into Arun District Councils Local Development Plan have concluded that the site is an appropriate area for employment and is not sensitive being defined by the BNRR to the north, the railway to the east, an existing industrial estate to the south and the A29 to the west.

The application site is not located near to a sensitive or vulnerable location.

2.7 Is the proposal unusually complex and potentially hazardous?

The proposal is for an employment park containing mixed use classes A1, A3, A5, C1 Sui Generis, B1, B2 and B8 being a common form of business park development not raising issues of complexity or pollution consequences. Sui Generis uses, will be defined as not including hazardous activities.

The proposal is not complex or potentially hazardous.

From the above analysis the proposed development does not match any of the three example cases which the Secretary of State cites as being likely to require EIA.

Circular 02/99 states that for all Schedule 2 Development there are three broad criteria which the local planning authority should consider when determining whether or not EIA is required;

- The characteristics of the development (e.g. its size, use of natural resources, quantities of pollution and waste generated)
- The environmental Sensitivity of the location; and,
- The characteristics of the potential impact (e.g. its magnitude and duration)

The following information is provided to assist the local planning authority in their consideration as to whether or not the proposal is EIA development in terms of these three criteria.

2.8 The nature of the development

The area for development proposed in this outline planning application is shown on the Development Framework Plan Fig 2 at Appendix 2. The development is not of a scale or character to be described as a major development with more than local significance although it will be an important development in the context of maintaining and creating jobs and

assisting in the growth of the economy of Arun District Council. The flood compensation area will be returned to farming uses with some areas set aside for ecological enhancement.

Although the application is in outline, with details of layout and form reserved for subsequent approval, the planning application will include a Development Framework Plan which will set out the main parameters of the development including:

- The intended Use Classes;
- The extent of structural landscaping that will remain common to all of the illustrative alternative plot configurations
- The principal means of access into the site;

In addition, parameter plans will be provided that determine:

- The extent of development with illustrative plot configurations to show how the site may be built out;
- The scale and massing of buildings appropriate to different parts of the site;
- The proposed earthworks required to create level development plateaux above the 2m floodplain;
- The proposed foul waste strategy;
- The proposed surface water drainage strategy through SUDS;
- Cycle and pedestrian routes;

The need to bring forward the timing of this development arises from specific enquiries received from businesses in the locality and from commercial agent advice

Four illustrations of possible site subdivision and uses are provided below:

The maximum gross floor area of development will be 50,000m² and will create significant employment opportunities while boosting the local economy.

Access

Access to the employment area will be taken directly off the A29 from the recently constructed roundabout at the western end of the BNRR. The BNRR which was subject to its own EIA is currently under construction to the north of the application site. The site is therefore readily accessible to develop in the immediate term without the need for significant additional infrastructure works that might cause adverse environmental effects. Provision for access to the neighbouring Asda owned land will be accommodated in the road design.

2.9 The environmental sensitivity of the area

In existing land use terms the site is an existing arable field with very few features and while characteristic of the area is not a rare landscape type or a landscape that is sensitive to change. The overall character of the application site can be described as urban fringe lying north of an existing industrial estate and enclosed by major roads to the north and south and railway line further to the east.

Ecological studies carried out by Aluco Ecology in October 2012 and updated in February 2013 have concluded that the employment area and flood compensation land will not cause loss of sensitive habitats or affect the integrity of the recently formed ecology habitats associated with the road construction.

2.10 The characteristics of potential impact

LANDSCAPE IMPACTS

A landscape strategy and visual impact assessment will be submitted by Davies Landscape Architects (DLA) in support of the planning application which will provide confidence that the potential visual impact of the proposal will be identified and adequately minimised and mitigated where necessary.

Helpfully, a judgement on the quality and sensitivity of the landscape and visual receptors and the likely effects of a development in this location can be informed by reference to the Landscape and Visual Appendix 11 submitted with the Environmental Statement for the Asda mixed use development in 2008.

The Asda scheme comprised a large food store and associated business park over 8.8 ha which included 5.35ha of this application. While this application will include additional development to that associated with Asda scheme, the effects will be largely the same as the baseline characteristics are largely the same and very localised.

The conclusion of the Asda LVIA is that:..... *"There will be no significant impact on national or county landscape character, or that of the South Downs AONB as a result of the proposals. There will be a moderate significant effect on the local landscape character of the Site, due to the extension of the existing urban area. However, this will be mitigated by high quality building and landscape design, including substantial new tree planting and hedgerow planting".*

Planting mitigation would ultimately bring about.... *"a moderately significant benefit".*

Development of this scale will always bring about changes in character and as this is an allocated employment site is an inevitability and the important consideration is to ensure that change does not cause long term harm.

VISUAL IMPACTS

Again, the Asda ES is helpful in informing the Council as to the likely visual effects associated with this development. The LVIA describes a summary of the views:

- Local views from the west are screened by mature trees and hedgerows along the A29 and within the caravan site.
- Local views from the east are predominantly screened by hedgerows and extensive tree planting on the golf course.
- From the existing urban edge of Bognor Regis to the south, local views are restricted to limited views from the adjacent trading estates.
- The nearby village of Shripney is screened by mature trees and hedgerows along its southern edge.
- Medium distant views across the flat, low-lying landscape from public rights of way to the north are partially screened by intervening hedgerows and a slight rise in ground level.
- In long distance views from the edge of the South Downs, the Site is barely discernible.

It was concluded that there would be no significant adverse visual impacts arising as a result of the construction works or on completion of the development. Some temporary moderate effects were identified from the golf course and footpath to the east of the railway line and near locations around the A29, but they would all be removed as planting matured.

The site is not therefore considered visually sensitive to change. A landscape and visual impact appraisal will be submitted with the planning application for the employment development and this will inform the production of the Development Framework Plan establishing parameters for the design, scale, massing and location of buildings to ensure that the development is appropriately assimilated within its setting.

FLOOD RISK AND DRAINAGE

The Environment Agency's indicative Flood Map shows the site to be located within Flood Zone 1 (Lowest Risk) through to Zone 3 (highest risk).

The Environment Agency's agreed flood level including climate change for the Lidsey Rife catchment is 2.00m AOD. It is known that the Lidsey Rife floodplain is slow moving and not prone to flash flooding within the area of the site. Any flood water tends to peak over a number of days as more water enters the catchment.

The National Planning Policy Framework - Department for Communities and Local Government (2012) which is the current guidance on development and flood risk in England and Wales highlights that commercial sites do not need to be placed within Flood Zone 1 like residential site and can be located within areas liable to flood.

However, the preferred development strategy is to raise the site above the flood level to provide maximum commercial viability and to provide a lower insurance risk.

As the site lies partially within a fluvial floodplain flood compensation works will be provided to compensate for the volume lost. This has been discussed with the Environment Agency and the principle has been agreed that the site can be lifted over the 2.00m contour. All flood compensation works will provide a level for level cut and fill exercise within close proximity of the site.

Typically flood compensation works will raise levels within the site by an approximate depth range from 0 to 1m of fill.

The land highlighted for this work will lie within an existing arable field to the north of the site (6.8ha adjacent) to the new Bognor Northern Relief Road (BNRR). The principle of flood compensation within the area has already been established as this was required as part of the road construction.

The flood compensation area will be returned to agricultural uses following completion of the compensation works and will also included some ecological enhancement areas which will be finalised during the consultation and design process.

Surface Water Drainage:

The National Planning Policy Framework requires that new developments do not exacerbate flood risks elsewhere, which means there is a need to control drainage and runoff to ensure there are no increases in overland flow as a result of the development. To achieve this Sustainable Drainage Systems (SuDS) will be incorporated into the surface water drainage strategy to mitigate the additional runoff and reduce flood risk to downstream areas.

The philosophy of the SuDS will be to replicate as closely as possible the natural drainage regime from a site before development, reducing the impact on receiving watercourses.

The site ground conditions are typically clay soils and would not be suitable for permeable to enable infiltration to the ground via infiltration type systems. The watercourse the runs through the site is the most suitable outfall.

The Environment Agency have highlighted that they expect the surface water runoff to be managed to enable the system to discharge similar to its existing Greenfield state. This will either be as a staged flow rate or flow withheld and discharged at the rate of Q_{bar} .

As part of the storm water strategy SuDS are going to be very important on site as part of the attenuation system, this will include the use of swales running alongside the road system, this would then act as storage as well as a quality control.

Permeable paving may also be used with the parking areas as a water quality improvement and an attenuation feature.

It is proposed to implement a treatment train for the surface water runoff which will be formed using a combination of permeable paving, swales, filter drains and an attenuation pond before discharging to the adjacent watercourse.

The surface water runoff from the development for all storm events up to and including the 100-year +30% climate change storms will be attenuated.

Foul Water Drainage:

Southern Water has confirmed that capacity is available in the local system subject to some local upsizing works, the design of which is currently underway.

NOISE

The site is not considered to lie within an acoustically sensitive area or adjacent to sensitive receptors. The nearest residence lies 300m north of the site and the BNRR lies between it. No additional reports are thought necessary at this stage.

AIR QUALITY

It is not considered that an Air Quality Assessment needs to be prepared for this application as all the necessary assessments for emissions associated with traffic were undertaken in association with the BNRR environmental statement. Uses that are likely to generate harmful emissions are not included within this application.

CONSTRUCTION IMPACTS

Construction impacts will, by their nature, be temporary, with the development likely to be constructed in phases as individual plots are developed.

The landowners will ensure that the main contractor will be registered with the Considerate Constructors Scheme and will be framed by the guidance for compliance under the relevant BREEAM requirement (i.e. Man 3 – Construction Site Impacts).

Ground Investigations will determine the required construction methods for the site with standard precast or cast likely to be utilised to provide the building development platforms.

Methods to suppress construction noise, dust and light spillage will be included in the Construction Environmental Management Plan (CEMP), which will be agreed in writing with the local planning authority. The CEMP will provide monitoring and construction statements to ensure potential environmental impact is minimised.

The construction process is not likely to result in any unusually complex or hazardous effects to the environment, with strict controls enforced through complementary regulation beyond that required by the planning system.

TRANSPORTATION

An interim Transport Appraisal has been prepared by MJA Consulting engineers and is attached at Appendix 3

The principal constraint to traffic movement in the area is the capacity of the Rowan Way roundabout. Based on new traffic counts undertaken at the Rowan Way roundabout in 2012, the MJA modelling undertaken for the Transport Assessment has indicated that the employment area that lies between the existing Oldlands Industrial estate and the BNRR could accommodate up to 46,000m² of B1 office development before significant queuing occurs at the roundabout.

it is very unlikely that this amount of B1 office use will be developed on this site and it is anticipated that in the current economic climate the maximum amount of B1 will not exceed 25-30,000m².

Nevertheless, a full Transport Assessment will be produced to show the predicted traffic flows and impacts on the highway network in conjunction with a Framework Travel Plan which will identify measures to reduce reliance on the motor car in favour of other sustainable modes of transport such as walking, cycling and bus which will all be available to and from the site.

SUSTAINABILITY

A footpath exists on the western side of Shripney Road, which provides a continuous pedestrian link between Shripney and Bognor Regis. Crossing points have been provided at the BNRR roundabout (across the site access and the A29 (s) arms). In conjunction with the imminent speed limit reduction along the A29, crossing points will enable pedestrians and cyclist to access the wide footway/cycleway.

The BNRR will include a wide footway/cycleway along its southern side, for its entire length providing opportunity for a link into the site.

To the south of the Rowan Way roundabout footway/cycleways are provided on both sides of the A29 Shripney Road, leading to South Bersted and Bognor Regis.

A regular bus service (Stagecoach 66/66A) operates along the A29. The closest bus stops are located around 350m and 400m to the south of the site. These bus shelters provide timetable information for passengers.

Bognor Regis Railway Station is located around 2.6km south of the site. Whilst this distance is further than the generally recommended walking distance, the railway station is accessible via the Stagecoach 66 service and takes approximately 13 minutes.

There are numerous local amenities and facilities within a 2km walking distance of the site. The closest being the Bognor Regis Retail Park include, where a range of retail opportunities, including food, are available.

From the above, it is considered that the Oldlands Farm site is situated within walking distance of numerous amenities and is accessible via a range of sustainable modes.

ECOLOGY

It has been concluded that the habitats on site have a generally low intrinsic value, and low potential for protected species to be present.

The ecology assessment attached at Appendix 4 has identified the main potential ecological impacts within the predicted zone of influence and those considered potentially likely to arise in the absence of mitigation.

Potential Impacts on Designated Sites – Solent SPA/SAC/Ramsar sites

The nature, scale and location of the development are likely to be such that legally designated sites are considered to be of sufficient distance for the proposed development not to have significant adverse impacts on their features.

Potential Impacts on Berstead Brooks Local Nature Reserve

The nature, scale and location of the development are likely to be such that non statutory designated sites are considered to be of sufficient distance for the proposed development not to have significant adverse impacts on their features.

Potential Impacts on Habitats and Vegetation

The habitats on site are of low nature conservation value. The general impact of loss of these habitats is considered to be insignificant. Whilst the ditch line that is present on site is of low intrinsic value being a bramble dominated hollow, its loss in a local context will see the reduction in a species poor semi natural habitat within the local environment. The wet watercourse that runs north to south on the eastern boundary and the wet watercourse along the railway are both on the edges of the site.

Potential for Impacts on Protected Species and Species of Conservation Concern

The potential for nesting bird species to be affected by development is present within the ditch line and boundaries affected, and any area of crop planted. If these areas were to be removed or cut there is the potential for the development to affect the nests of birds, which would be contrary to Section 1 of the Wildlife & Countryside Act 1981 (as amended).

The development will see the loss of arable farmland used by farmland birds including Skylark and Linnet in 2012. The loss of this farmland will have an adverse effect in a very local area only, and the wider landscape is retained as open farmed countryside. The wider landscape is also proposed in the draft Arun District Council Local Plan 2013-2028 as 'Green Infrastructure'.

Badgers are known in the wider environment. The development is unlikely to have any direct effects on Badger populations, and the site provides limited foraging potential.

The loss of the ditch line in terms of habitat for Water Vole and Otter is a low impact as the current value of this ditch as habitat is considered low. A precautionary approach should however be taken with regard to construction effects on this feature. The wet watercourses on the site boundary may be affected as part of flood compensation and open space measures and if this is the case mitigation options to offset and avoid the potential to affect protected Water Vole and Grass Snake will need to be considered.

Off site there are watercourses that lead to the Lidsey Rife. Without mitigation for potential pollution from construction there is potential for run off to have adverse effects on these features in the short term.

Mitigation

A number of options for mitigation and biodiversity gain are suggested. With such mitigation a future scheme would be likely to satisfy biodiversity policy and national planning policy and legislation.

ARCHAEOLOGY

A cultural assessment of the immediate vicinity, including the application site area, [Drivas Jonas 2007] indicated the proposed development site lies in an area of archaeological potential, with later pre-historic, Roman and Saxon activity having been previously identified in the local area. This assessment was proved by subsequent evaluation work by Wessex Archaeology [WA 2007] and Cotswold Archaeology [CA 2008]

A program of archaeological evaluation undertaken by Wessex Archaeology proximal to the north western corner of the application site identified a Bronze Age ditch and a Romano-British post hole and two ditches of similar date. [WA 2007] In May and June of 2008 an evaluation undertaken by Cotswold Archaeology on an area of c. 9.00 hectares including the main / central area of the application site identified multi period archaeological deposits [CA 2008].

The 2008 evaluation site demonstrated that there were archaeological deposits dating from the Middle Bronze Age to the Roman period were present across the evaluation site. Funerary activity dating to the Middle Bronze Age and Iron Age was recorded in the south west corner of the evaluation site.

The Cotswold Archaeology [CA 2008] results suggest the highest archaeological potential is biased towards the south western west and central area of evaluated site with a reduction in archaeology recorded to the east and a near absence in the south east corner of the evaluated area. Where present, archaeology lay at an average depth of between 0.60m to 1.00m below ground level. The reduction in concentration of archaeology from south west to east / north east suggests areas that have not been evaluated are likely to show lower incidence of archaeological features.

It is suggested that previously un-evaluated site areas that lie within the gross development footprint should be subjected to archaeological evaluation at a level equivalent to that undertaken in the 2008 evaluation [CA 2008]. Where areas are confirmed to be net receivers of material these areas may be excluded from the evaluation requirement. It is suggested this evaluation phased may be undertaken by Condition post determination of the application.

3.0 CONCLUSION

Regardless of whether the development requires EIA, the planning application for the proposed development will be accompanied by the following detailed assessments:

- Flood Risk Assessment;
- Landscape and Visual Appraisal;
- Transport Assessment and Travel Plan;
- Ecology Assessment;
- Archaeology Assessment;
- Economic Viability Assessment;
- Retail Impact Assessment.

Following consideration of the likely effects from the delivery of the proposal in this location, the information provided above does not indicate that the development will have particularly complex effects, which would require further expert and detailed analysis, in addition to the above assessments that will be provided with the planning application.

Furthermore, environmental statements have recently been undertaken in association with the Asda development which covered part of this application as well as the BNRR. The key environmental issues and likely effects that might be associated with development in this location are already known to the planning authority and stakeholders and have been fully covered in these applications.

Given the findings of these reports and the body of survey work already undertaken, it is our view that the nature, size and location of the proposed development is such that this proposal will not result in any significant effects on the environment and an EIA is not necessary.

Appendix 1

Planning Application Boundary – 1: 5000



Appendix 2

Development Framework Plan 1:2500

Appendix 3

Interim Transport Appraisal



Appendix 4

Ecology Appraisal



ALUCO ECOLOGY

ECOLOGICAL APPRAISAL

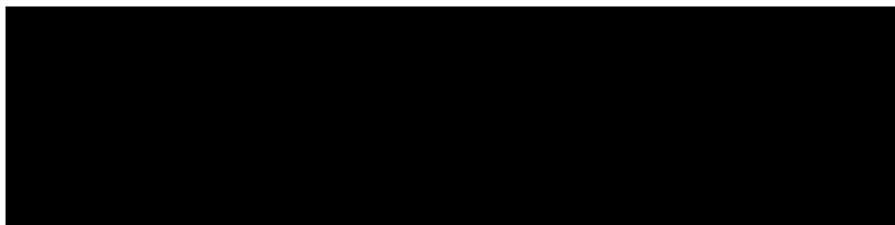
**LAND AT OLDLANDS FARM,
BOGNOR REGIS**

FEBRUARY 2013

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ECOLOGICAL APPRAISAL, LAND AT OLDLANDS, BOGNOR REGIS

1.0 INTRODUCTION

1.1 Background

1.1.1 Aluco Ecology Ltd was commissioned to carry out an ecological appraisal of land at Oldlands Farm, Bognor Regis, West Sussex. An 'Ecological Appraisal' is a general investigation of the likely ecological and nature conservation issues associated with the site and its potential development.

1.1.2 The aim of an Ecological Appraisal is to:

- highlight any features of particular ecological value;
- identify potential impacts to ecology as a result of the proposed works;
- identify any ecological issues that may have legal or planning implications such as the presence of protected species; and
- recommend any further work (such as targeted protected species surveys) required in order to fully assess the value of the site, and therefore the potential ecological impacts of the proposals that may arise.

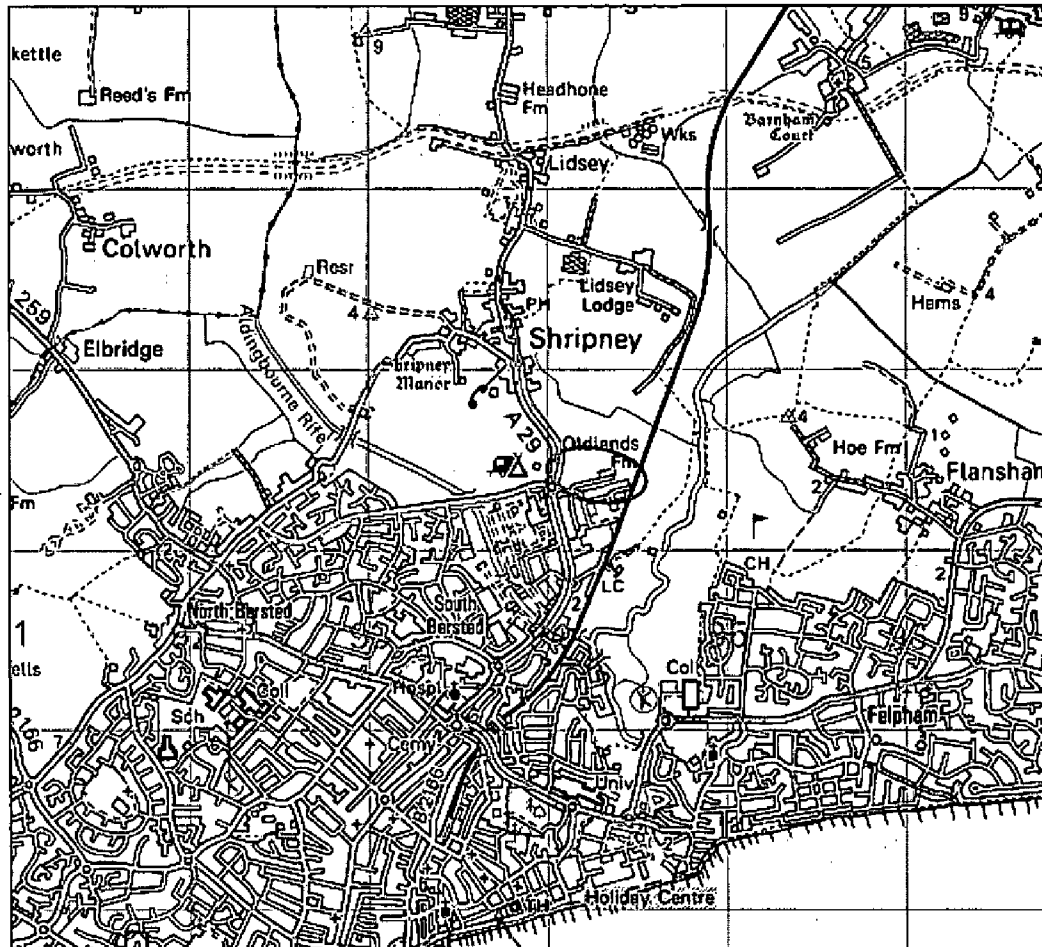
1.1.3 The Government sets out its objectives for conserving and enhancing biodiversity in the new National Planning Policy Framework that also makes reference to the existing ODPM Circular 06/2005. The Government's objectives for planning and biodiversity are that '...the planning system should seek not just to protect, but where possible to enhance biodiversity – making sure we don't just have isolated pockets of wildlife, but rich and connected green spaces for all kinds of species to thrive.'

1.1.4 The Framework goes on to state that at the heart of the planning system is a presumption in favour of sustainable development.

1.2 Outline of the Scheme and Site Location

1.2.1 The land consists of open arable farmland north and south of the partially constructed Bognor Northern Relief Road (BNRR) (A29-Flansham section). The location of the site is shown at **Figure 1** below.





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Figure 1: Location of the Site

- 1.2.2 The land subject to the Appraisal is proposed to be developed for commercial purposes. The extent of the site is shown at **Figure 2** below.

1.3 Relevant Legislation and Policy

- 1.3.1 The outcomes of this Ecological Appraisal will be tested against relevant legislation and policy; namely the Conservation of Habitats & Species Regulations 2010 in relation to the protection of European sites (Special Protection Areas SPA, and Special Areas of Conservation SAC) and European protected species (eg bats, dormouse, great crested newts) (**Technical Appendix 1**) and the Wildlife & Countryside Act 1981 (as amended) and Countryside & Rights of Way Act (CROW) 2000 for protected species and the designation and protection of SSSIs (**Technical Appendix 2**). The Protection of Badgers Act 1992 gives protection to Badgers *Meles meles*.
- 1.3.2 In addition to the National Planning Policy Framework and the legislation outlined above, the strategic and local planning policies are the principal policies against which the outcomes of this ecological appraisal will be tested; the Arun District Council Local Development



Framework contains policies in the pre-submission Core Strategy consultation Draft relating to ecology, these are outlined at **Technical Appendix 3**.

- 1.3.3 Under the Governments duty to conserve Biodiversity, a number of Biodiversity Action Plans have been prepared for habitats and species of conservation concern, including national BAPs and a Biodiversity Action Plan for Sussex, and this is considered in general ecological site appraisal.

2.0 ASSESSMENT METHODOLOGY

2.1 Introduction

- 2.1.1 The methodology for this appraisal is based on the Guidelines for Ecological Impact Assessment (EcIA) in the United Kingdom published by the Institute of Ecology and Environmental Management (IEEM, 2006), and on the guidelines for ecological appraisal (IEEM, 2012).

2.2 Site Survey Methodology

- 2.2.1 The first stage of the appraisal is a desk study of the site and associated Zone of Influence. This provides background information on the site and local environment in order to effectively target field survey and further desk research. The aims of the field survey are to record land-use and broad vegetation types present on the site and in the surrounding areas, and to evaluate the habitats and vegetation communities' potential ecological value along with their potential to support protected species, species of principal importance, and any other notable species. Further details of the methodology used can be found in **Technical Appendix 4**.

3.0 BIOPHYSICAL CHANGES AND THE ZONE OF INFLUENCE

3.1 Introduction

- 3.1.1 In order to be able to target relevant ecological survey and assess the impacts of a proposed development, it is necessary to identify the activities that may result in biophysical changes from the development and the area these cover (i.e. the zone of influence). There are three stages of this development scheme that include activities that may have an impact on features of ecological value; namely site preparation, construction and operation / use.

- 3.1.2 **Figure 2** below shows the extent of the site and proposed development area.

3.2 Biophysical Changes associated with the Development Scheme – Determination of the Zone of Influence

- 3.2.1 It is anticipated that change of use of the site would result in the physical structure of the present site being altered. The potential zone of influence of the proposal is determined from the predicted biophysical changes brought about by activities associated with construction and



post-construction phases. Therefore the zone is predicted to extend across the development footprint and locally along the edge of the site, and immediately adjacent to the site. Consequently, survey has been carried out within this zone.

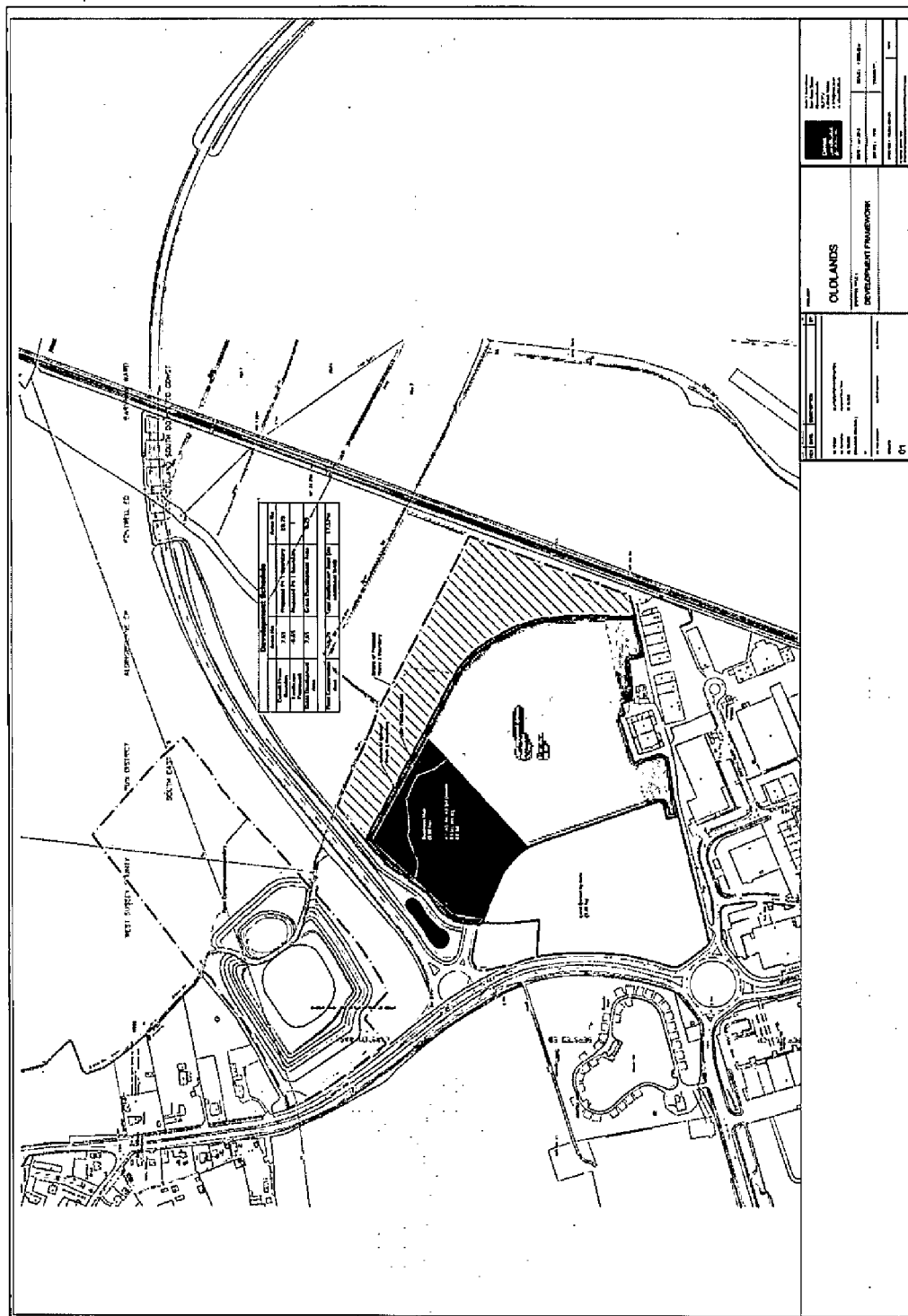
3.3 Site Preparation / Construction Activities and Biophysical Changes

3.3.1 During the construction phase, it is predicted that site preparation activities will include some earthworks and earth stripping associated with the building and road footprints. This phase may affect habitat suitable for wildlife. Without appropriate mitigation, site clearance work may result in death or injury to protected species (if they are present), or damage to other features of ecological value. Construction could result in the loss of features of ecological value and/or the loss of habitat of protected species resulting in a net decrease in biodiversity.

3.3.2 The construction of the site has the potential to affect adjacent habitats, where present, through noise, air and run off pollution.

3.4 Predicted Operational Activities during Use Phase and Biophysical Changes

3.4.1 The operational phase will need to consider how protected species and species of conservation concern may use the site and zone of influence, and what effect the proposals may have on their conservation status locally.





4.0 BASELINE CONDITIONS WITHIN THE ZONE OF INFLUENCE

4.1 Introduction

- 4.1.1 The ecological baseline describes the site in the context of the characteristic habitats of the area, and includes descriptions of designated sites and ecological features present within the potential zone of influence of the proposed development. The site was surveyed on 11 September 2012 & 19 February 2013.

4.2 Designated Sites

Statutory Designated Sites

- 4.2.1 There are no Sites of Special Scientific Interest within 2km of the site.
- 4.2.2 There is a single European and Internationally designated site just under 6km from the site. This is Pagham Harbour Special Protection Area (SPA); designated under the Wild Birds Directive 79/409/EEC and under the Ramsar Convention 1971. The site is about 5.9km south west of Oldlands Farm and is designated for its migratory, breeding and non breeding wetland bird species. The SPA citation for this site is reproduced in **Technical Appendix 5**.

Local Nature Reserves

- 4.2.3 A single Local Nature Reserve (LNR), Berstead Brooks LNR is located to the west of the site on the far side of the A29. This is designated for its grazing marsh and wetland habitats alongside the Aldingbourne Rife. The location of this site is shown at **Technical Appendix 5**.

4.3 Habitats and Vegetation

Introduction

- 4.3.1 The site is made up of an area dominated large arable fields with relatively open boundaries within the catchment of the Lidsey Rife. The majority of the site is to the south of the partially constructed Bognor Northern Relief Road, to the east of the A29 and to the north of the Southern Cross Industrial Estate. An area north of the new relief road is proposed for flood storage capacity. **Figure 3** below shows the main habitats present on site.

Arable

- 4.3.2 The majority of the site is made up of arable farmland that is intensively farmed with virtually no field margins. The arable flora was examined during the site visit and a number of common arable plants were recorded including Scentless Mayweed *Tripleurospermum inodorum*, Common Fumitory *Fumaria officinalis*, Fat Hen *Chenopodium alba*, Common Poppy *Papaver rhoeas*, Cranesbills *Geranium dissectum* & *G. mollis*, Thistles *Cirsium arvense* & *C. vulgare*, Groundsel *Senecio vulgaris*, Broad-leaved Dock *Rumex obtusifolia*, Oilseed Rape *Brassica napus*, Knotgrass *Polygonum sp.*, Spear-leaved Orache *Atriplex prostata* and Sun Spurge *Euphorbia helioscopia*. The main arable area is shown at **Photo 1**.





Photo1: Intensive Arable Units on site. In 2012 the field was a Wheat crop. The photo taken from the BNRR boundary looking south towards the industrial estate.

Ruderal & Field Edge South of Relief Road

- 4.3.3 The majority of the field boundaries are marked as outside the red line boundary, but immediately adjacent so are described here. The western boundary with the A29 is a ruderal edge to the site, with a couple of Hawthorn towards the A29 roundabout. The road verge is mown species poor grassland. The ruderal edge is dominated by nutrient tolerant species such as Nettle *Urtica dioica*, Hogweed *Heracleum sphondylium*, Cow Parsley *Anthriscus sylvestris*, with some patches of False Oat Grass *Arrhenatherum elatius*. Part of the boundary has been fenced and Bramble *Rubus fruticosus* and Clematis *Clematis vit-alba* is sprawling in places. **Photo 2** shows the boundary feature.
- 4.3.4 The northern boundary of the site is partially made up of the southern land take for the Bognor Northern Relief Road (BNRR) and at present is a mesh and metal post fence line, and partially open arable land with no boundary. This continues until the southern boundary with the Industrial Estate.
- 4.3.5 The southern boundary is also partially open ruderal vegetation with patches of Bramble and Nettle and relatively recent landscape planting (including Willow *Salix* sp., Birch *Betula* sp, Maples *Acer* sp. and conifers) along the northern edge of the industrial estate. Oldlands Farmhouse is present to the south of the eastern arable unit, and abandoned farm building shells are present to the west. A track leading to these buildings is planted with a non-native Blackthorn *Prunus* sp. variety hedge and occasional self-seeded Elder *Sambucus nigra* shrubs and Buddleia *Buddleia davidii*. See **Photo 3** below.



Ruderal and Field edge North of Relief Road

- 4.3.6 The red line boundary of the site includes one field edge for the arable land north of the Relief Road and this is the wet watercourse running north to south and crossing the Relief Road. This is described further below.



Photo 2: Western boundary with the A29 showing ruderal edge and individual Hawthorn on road boundary.



Photo 3: Southern Boundary showing ruderal vegetation and Industrial Estate