



TM/HP07095-2

24 July 2014

Cian Cronin Esq
Senior Planner (Strategic Development)
Arun District Council
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West Sussex
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Dear Mr Cronin

PLANNING APPLICATION FOR THE ERECTION OF 2 NO. DETACHED INDUSTRIAL / DISTRIBUTION UNITS (B1(c)/B2/B8) AND ASSOCIATED WORKS AT OLDLANDS FARM, STEYNING WAY, BOGNOR REGIS - ADC REF: BE/73/14/PL

On behalf of our client, Sime Darby London Ltd (hereafter SDLL), we are writing to comment on the above application. Our intention, as always, is to constructively contribute to the delivery of the Enterprise Bognor Regis strategic employment area, and our comments should be read in that context.

SDLL is an active member of the Bognor Regis Regeneration Board, and as such, our client supports the regeneration plans for Bognor Regis and the aims to raise average wages, raise educational attainment and skill levels, improve competitiveness and sustainability, engage the local community and promote best practice. To that end, SDLL are generally supportive of the application as it brings forward investment and jobs to Bognor Regis.

As you will be aware, our client owns land known as the Lec Airfield, Bognor Regis. SDLL and its professional team has been working with Arun District Council (hereafter ADC) and key stakeholders over a number of years to seek to bring forward deliverable development on the Airfield site.



ADC has made it clear that it wishes to see the Lec Airfield land brought forward as part of a comprehensive 'vision' for the wider Enterprise Bognor Regis scheme, which includes Oldlands Farm. It is in this context that the comments on the above application are submitted for your consideration.

Background

The key priority identified by ADC in the emerging Local Plan is to provide employment land which can cater for the long term needs of Bognor Regis and environs in order to provide a range of employment opportunities (whether through existing businesses, new businesses or businesses seeking to relocate to the local area), reduce out commuting and retain spending in the local economy. This has been promoted under the enterprise@BognorRegis initiative which is incorporated in the Coast to Capital Local Enterprise Partnership (C2CLEP) Strategic Economic Plan (SEP) for the creation of an Enterprise Zone at Bognor Regis.

The enterprise@BognorRegis bid, which SDLL strongly supports, envisaged a redefined gap including areas of eco-friendly commercial development (as part of a "green" theme) enclosed by the proposed North/South link road, together with retained open spaces and improved public access. This comprehensive approach sought to bring forward a form of development that would address the environmental constraints identified in the Economic and Employment Land Assessment (EELA) 2010 report as well as delivering the necessary infrastructure including the North/South link road.

SDLL has actively engaged with ADC to progress the Lec Airfield through the emerging Local Plan.

Comprehensive Development & North/South Link Road

Of fundamental importance to the enterprise@BognorRegis initiative (now referred to as the Bognor Regis Enterprise Zone' (BREZ) in the emerging Local Plan) is the need to provide interested parties (e.g. developers, occupiers, investors, etc.) with choice and competition of employment land sites. This can only be delivered through a comprehensive approach. ADC's vision for the BREZ has always been that the zone will be developed comprehensively. The approach is reinforced in the latest draft of the Local Plan (Summer 2014), which states in Policy EMP DM2 'Bognor Regis Enterprise Zone' *"Development of each site within the Enterprise Bognor Regis will not be acceptable on a piecemeal basis; proposals will only be considered in the context of an overall masterplan for each site developed in conjunction with the Council"*. We believe that this comprehensive planning approach should apply not only to the individual sites within the BREZ initiative, but across the whole scheme,



as far as possible, and certainly in respect of key infrastructure requirements which must be planned, co-ordinated and delivered at a strategic level.

It is acknowledged that the emerging Local Plan will be the subject of further consultation and has yet to be adopted. However, as set out above, the principles of delivering a comprehensive development at the BREZ are borne out of extensive work by the Council and others and appear to have widespread support from key stakeholders including C2CLEP, Coastal West Sussex (CWS), the Bognor Regis Regeneration Board and local community. Furthermore, it has previously been agreed at an ADC Special Council Meeting that the emerging Local Plan should be treated as a material planning consideration in the determination of planning applications.

It follows from the emerging Local Plan policy position (and as also agreed at a previous meeting of the Bognor Regis Regeneration Board) that ADC should ensure that the schemes or masterplans for the individual sites that make up the BREZ vision (Oldlands Farm, Salt Box, Rowan Way Caravan Park and the Lec Airfield) should be planned comprehensively to ensure that all of the sites can come forward. An overarching strategic masterplan for the whole BREZ area is required to guide all site-specific proposals.

In particular, we would draw attention to the alignment reserved for the proposed North/South relief road. The emerging Local Plan seeks to safeguard links between Felpham Way and the Northern Relief Road – this link forms part of the proposed North/South Bognor Regis Relief Road – see draft Policy T SP3. This link is of critical importance to the delivery of the remainder of the BREZ area including the Airfield land and it is a key infrastructure requirement for Bognor Regis. The proposed North-South link road would not only open up the Lec Airfield for employment land use, but also provide an important alternative access for vehicles, bicycles and pedestrians to the town centre, seafront and key destinations including the University of Chichester and Butlins from the A27 and A29.

There does not appear to be any reference to the application funding any of the costs of delivering the North/South Bognor Regis Link Road. This is a one time opportunity not to be missed.

Policy GEN8 of the adopted Local Plan states: *"The Local Planning Authority may seek fair and reasonable contributions to be made by landowners or developers towards the cost of infrastructure, service or amenity provision, to meet the needs of the occupiers or users of the development"*.



Policy EMP2 SP2 'Strategic Employment Land Allocations' of the emerging Local Plan states: *"The Strategic Allocations (which includes all four sites at Enterprise Bognor Regis) will: ... deliver new infrastructure to meet the requirements of businesses that can provide wider benefits for the sub-region"*.

The supporting text of Policy EMP DM2 'Bognor Regis Enterprise Zone' goes on to state that there should be *"provision of adequate infrastructure and servicing to meet cumulative impacts arising from the anticipated development of future phases"*.

Other major road schemes in the District have attracted significant funding from nearby developments. For example, the Lyminster Bypass northern section is being funded from contributions from schemes in the area including Toddington Nurseries (aka North Littlehampton), Courtwick (Gleasons) and Morrisons. Similarly, Barratt David Wilson Homes, Persimmon Homes and Berkeley Homes made significant contributions towards the Bognor Regis Northern Relief Road. Such arrangements should be put in place to assist the delivery of the North/South Bognor Regis Link Road. It is therefore our view that the application fails to demonstrate how it will contribute to the funding of the road, thereby prejudicing the delivery of the remainder of the BREZ.

This again points to the need for an overarching strategic masterplan and guidance for the sites which form the BREZ initiative. In the absence of such a plan, our client has concerns that the current Oldlands Farm application is piecemeal development and prejudices the comprehensive development of the remainder of the BREZ.

Compliance with Adopted Local Plan Policy

The site straddles two policy areas in the 2003 Local Plan, namely Policy Site 5 and Site 6. Policy Site 5 (iii) allocates 11.2ha at Oldlands Farm as a 'commercial' area. Policy Site 6 is an allocation for a mix of residential, employment and public open space, together with relief roads. The employment element of the allocation is made up of 11.25 ha for a high quality business park (Use Class B1, but with some B2/B8 if appropriate) and an 11.8 ha reserve element for an extension to the business park subject to overcoming flooding issues.



Adopted planning policy 'Policy Site 6' states *"Planning permission will only be granted for proposals which demonstrate that the whole of SITE6 can be developed in a comprehensive and co-ordinated manner. Submitted schemes should be in accordance with an indicative Master Plan and Implementation and Phasing Schedules to be agreed between the Council and the relevant landowners and developers as part of the proposed Development Brief. Planning permissions will be subject to planning obligations to secure the necessary co-ordination and phasing"*.

We have concerns that the current application fails to deliver the development of the site in a comprehensive and co-ordinated manner as required under Policy Site 6. The application site does not include a sizeable area of Oldlands Farm next to Shripney Road, which appears to be the land that was the subject of the previous Asda planning application. This site is closest to the existing built up area and is the least constrained part of Oldlands Farm in terms of flooding. The current application proposals are almost entirely within Flood Zones 2/3 and extend into the reserve business park area allocated as part of Site 6. The application does not appear to offer any explanation as to why the least constrained part of the allocation cannot be developed as part of the current application thereby allowing the reserve site and Flood Plain to be 'reserved' and developed at a future stage as needed. This again highlights the need for a comprehensive masterplan to be drawn up and agreed by all parties (in accordance with adopted and emerging Local Plan policy) which plans for the long term development of the area in a manner which balances the various technical and commercial considerations across the whole site.

Current and Previous Planning Applications

The applicant states that, along with phase 1a of the extant outline Hanbury permission (the enabling development element of that previous application to fund the advance road and flood mitigation infrastructure), the two schemes will kick-start Oldlands Farm which is important for Enterprise Bognor Regis. Some of the technical studies that support the current application (eg. highways) are based upon both schemes coming forward. However, if the Bericote application is approved and implemented, there will no longer be the need for the enabling development from the Hanbury scheme to fund site infrastructure.

In any event, the Bericote application is a full application on part of the site for which Hanbury was granted outline permission – so the implementation of the Bericote scheme would mean that the



Hanbury outline permission could not be implemented, and that a fresh application would be required for the balance of the Hanbury site.

This yet again highlights the importance of a comprehensive approach to be taken as advocated in the adopted an emerging Local Plans.

Public Consultation & Occupier Identification

ADC's Statement of Community Involvement (SCI) - June 2012, recommends that applicants consult with the local community and key stakeholders as part of the planning application process. For major planning applications the SCI recommends methods such as public exhibitions and public meetings/workshops to engage with the local community about proposals. More importantly, section 122 of the Localism Act imposed a legal duty on applicants to undertake pre-application consultation for certain forms of development, including schemes of 10,000 sqm or more of new floor space. We are not aware of any public consultation exercise that has been conducted in the preparation of the plans, proposed uses, etc. for the application. The applicants therefore appear not to have complied with the legal duty imposed on them by the Localism Act.

Finally, in the interests of transparency, we would request that the occupier should be identified by the time the application is considered by the planning committee. .

SDLL recognises that the development of the BREZ scheme, including Oldlands Farm offers a unique opportunity to dramatically boost regeneration and economic growth at Bognor Regis in a coordinated and comprehensive manner. To that end, SDLL welcomes the positive initiatives taken by ADC on the BREZ vision and we will continue to actively co-operate with the work being done to prepare LDO's and the Local Plan. However, in advance of this work and in the absence of an overarching masterplan for the strategic sites which has been agreed by ADC and key stakeholders, we have concerns that the current Oldlands Farm application is piecemeal development and prejudices the comprehensive delivery of the remainder of the zone.

The emerging Local Plan emphasises the importance of the provision of adequate infrastructure to bring forward the wider BREZ strategic employment land allocation. In particular, the Local Plan sets out that each of the sites must provide adequate infrastructure to meet cumulative impacts arising from the anticipated development of future phases of development of the wider BREZ area. The



Bericote scheme should therefore be required to make a pro rata financial contribution towards the delivery of the BRNRR / A259 link road.

We also consider that there are a number of important unanswered questions in relation to the need for public participation and clarity over the identification of the occupier which should be addressed prior to the determination of the application.

SDLL trusts these comments are of assistance as part of your consideration of the planning application. Please do not hesitate to contact me should you have any queries.

Yours sincerely

A large black rectangular box used to redact the signature of Jeremy Gardiner.

JEREMY GARDINER
Regional Director
For and on behalf of WYG

Cc. David Pilkington, ADC
Raof Daud, SDLL