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Dear Sir

Application BN/57/19/RES
Reserved matters – 2274sqm of light industrial floorspace

Having considered the latest array of documents lodged by the applicant, I should like to add further representations in support of my objection to the application as presented.

1. **Current use of the area.** The applicant, in its supporting statement, has once again made reference to the current use of the land and made reference to the fuel station, fast-food establishments and Travel lodge as having large footprints relative to the existing residential dwellings. What has been omitted once again in the applicant's application is the reference to the Dandara application on the same site as the proposed factory and in which there will be 400 residential dwellings. The foot print of the dwellings will exceed that of the proposed factory and should be given consideration when viewing the merits of the design and integration.

The existing establishments referred to above are not without their nuisance to the local residents in terms of HGV engine (traction and auxiliary) noise, smell, restricting access and damage to the kerbs and roadside. Exacerbation of this is likely to cause considerable further nuisance.

2. **Economic benefits.** The application has suggested that the economic and employment benefit to the local area should carry considerable weight. My understanding of the applicant's business, albeit there is no information available to support an assumption by the planning authority either way, is that this is a very specialised industry in which employees are sought based on their specialised skills, not geographic location. I understand that a large proportion of these employees are not necessarily local to the area at all. The materials, equipment and specialisms are sufficiently specialised that there is not a large 'local' pool of suppliers or employees to benefit from this employment or business. The term 'local' here should be weighed up against the nuisance and detriment to the immediate locality. I would respectfully suggest here that the question is whether there would be any considerable benefit to the locality to the factory being sited where it is proposed as against

in a remote industrial park and this benefit, if any, weighed against the nuisance and harm to the local village.

3. **Scale of the industry.** In terms of the scale of the proposed building and the applicant's use, this appears to be something in excess of that contemplated by Class B1(c) use. The application is undertaking a specialised industrial process involving, according to their own website, "the largest non-aerospace [auto]clave on the South coast". There are machining centres, assembly areas, clean rooms "accommodating 120 highly experienced members..."

The applicant's business is in specialist composite manufacture. A crude analogy would be the much simpler composite, fibreglass reinforced plastic (FRP). By way of an example of other planning applications involving FRP, an application under P/14/1227/FP in the Portchester area for change of use from agricultural use to Class B1(c) provides an interesting comparison.

This local authority's decision report included *"In this case a B1c) use would be an acceptable use for the building given the distance from the nearest neighbouring dwellings and the proposed use class. Whilst there is some commentary in the representations that the end user is a boat builder that would be working with fibreglass hulls and undertaking boat construction the applicant's agent has confirmed that this is not the case. There is no actual end user given the absence of a planning permission however the applicant has had interest expressed from a small business engaged in boat building by hand. The agent has confirmed that "...the boats are small, the fibre glass hulls are brought to the site pre-formed and the user of the building would be using just hand tools to assemble the boat (eg..put the motor on the back, add the seat and a steering wheel". Should the user develop into fibreglass hull production or using heavy machinery then this is likely to be a general industry use (use class B2) and would not be in compliance with any B1c) planning permission should it be granted."*

Here, the applicant is in the business of designing and building customised dies, tools and composites – the equivalent of fibreglass hull production in the above case. Of additional note in that application was the very considerable distance from neighbouring properties. Entirely unlike this application where the boundary abuts an existing dwelling house.

4. **Number of employees and volume of traffic.** Class B1(c) excludes industrial process where there will be a 'detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit. One might ordinarily understand class B1 buildings to be used by artisanal type trades with small numbers of employees and a consequential low profile from the perspective of noise, vibration, smell, dust etc. Instead, the application is currently for a large 'factory', the applicant refers to the term throughout its supporting statement. The applicant is in the business of producing composites for a variety of industries and using large industrial processes (with "the largest non-aerospace clave installed on the South Coast"). The number of employees and the volume of traffic associated with this will, under an objective assessment by the 'reasonable man' conclude that this will generate a noise nuisance for residential properties sited only a few meters away both existing and under the separate Dandara application. I aver that any objective analysis concludes that a factory of this scale should not be sited within meters of existing and planned future dwellings.

Whilst this is an objective test, the potential for detriment to the amenity of the area must now consider that a much larger proportion of people in residential dwellings will be working from home now and in the future. Previously, more disruption during working hours may have been considered acceptable but in the 'post-coronavirus' working environment, it is likely that home-working will be considered normal. As a result, the increased sensitivity to noise, vibration, smells and fumes in particular during traditional working hours must be considered in any objective analysis, including during the summer months whilst windows are open.

Despite representations being made raising concerns about noise and smell of vehicles, industrial process and external equipment, the application has made no attempt to address or alleviate those concerns locally or via its application. Where there is no attempt to mitigate nuisance at the planning stage, there must be considerable concern as to their willingness to address nuisance once planning has been granted.

5. **Design.** The applicant's supporting statement refers to the expectation of buildings with a larger span but identifies no local comparisons in or near the village of Fontwell, only those outside of the city of Chichester. The comparison does not include reference to the locality to existing residential dwellings. Large industrial factories may be found on the outskirts of a city, spaced from residential dwellings. The same is not appropriate for a small semi-rural village.

The application includes a 2m high welded wire fence abutting existing residential property and will be adjacent to new residential dwellings. The planning does not appear to be subject to height maintenance on the plans where it abuts existing housing leading to the potential for nuisance and reduction of light.

I should like you to conclude that the proposed use by the applicant represents a heavy industrial process unsuited to use of land under planning class B1(c) and is actually that of class B2. Barnham and Eastergate policy EE3 refers to a resistance for class B2 owing to disruption by reason of the associated traffic. The potential to disruption of the local amenity and the livelihoods of the residents is significant and that the applicant has not made out grounds to satisfy a factory of this scale under the outline planning granted.

The western end of Fontwell is adjacent to the A27 but the noise associated with the road is less than may be anticipated. The traffic has slowed for the roundabout and the appreciable noise at the existing dwellings largely relates to motorbikes. There is some inappropriate use of HGVs in Arundel road for the services (which do not have HGV access) but the village should be considered to be semi-rural.

If you are not with me in rejecting the application for its failure to fall within the use class, and minded to grant the application in any event, I should like you to consider restrictions in terms of timing of operations, noise and subject to further reservation pending approval of any protrusions from the exterior of the building and emissions to the exterior and any poles, towers or masts on the site to include (but not necessarily limited to) – lighting, cameras, ventilation, air-handling equipment, dust extraction, fume extraction, steam outlets, power generation equipment and exhaust outlets. The area abuts the South Downs National Park which benefits from a Dark Skies policy. Walberton policy VE8 refers. Such restrictions should be made on the basis that the

residential area is likely to be used by those working from home. As such, a subjective analysis on the impact to this particular, semi-rural, locality is relevant.

Yours faithfully,

Andrew Titmus