



APPLICATIONS & APPEALS SERVICES

FORMER DISUSED CAR PARK
RUDFORD INDUSTRIAL ESTATE
FORD ROAD
CLYMPING
BN18 0BF

Change of use of former disused car park area for
the station of storage containers available for rent

PLANNING, DESIGN
& ACCESS STATEMENT

NJA/22/113

May 2022



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1.0 INTRODUCTION

1.1 Planning permission is sought for a change of use of an area of land which forms part of Rudford Industrial Estate and formally used for parking, to a Class B8 storage use. Within the site would be the siting of forty shipping containers provided for individual rent with access taken from an internal estate road via a pre-existing gated access.

1.2 This Supporting Statement addresses the design and access issues as well as relevant planning policy, having regard to the requirements of Article 8 of the Town and Country Planning (Development Management Procedure) Order 2015. The details of the proposals will be described and appraised having regard to the following aspects:

- **Physical Context** – explains the physical context of the site and its surroundings;
- **Planning Context** – the planning history of the site and broad policy requirements;
- **Use** – the purpose of the proposed additional accommodation;
- **Amount** – the extent of development on the site;

- **Scale** – the physical size of the development;
- **Layout** – the relationship of the proposed extension and alterations to neighbouring properties;
- **Appearance** – details of materials, style and impact upon the visual amenities of the area;
- **Landscape** – impact of the proposal on the existing landscape;
- **Access** – access to the development and parking provision.

1.3 The Council is requested to consider this Statement alongside the submitted plans and this demonstration that the proposed development accords with the relevant planning policies and is acceptable in all respects. It is hoped that the Council will support the proposal and grant Planning Permission.

2.0 PHYSICAL CONTEXT

2.1 Rudford Industrial Estate is a large industrial and commercial site situated to the northwest of the village of Clymping and positioned to the west of Ford Road/Church Lane from which access and egress is taken respectively. The Estate provides for a range of units of differing scales and designs providing accommodation for a mix of business, from vehicle repairs, electrical manufacturing, food warehousing, through to security and logistical services. Beyond the site sits agricultural land with a residential estate to the south.

2.2 Land subject of the application itself sits to the east of the estate and forms part of an area currently laid as hardstanding containing pockets of scrub vegetation enclosed with earth mounds upon which is hedgerow. The land extends east to west and takes access from the southern internal service road through a gated access. The land was last used to provide parking.

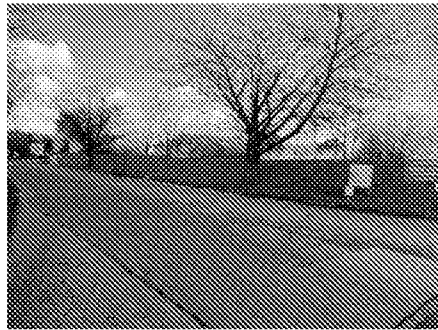
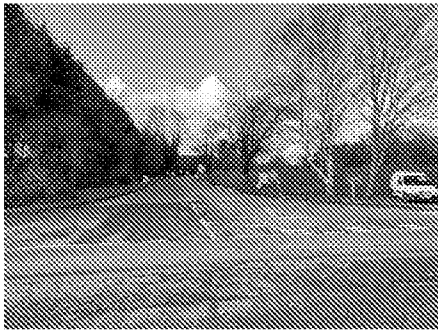
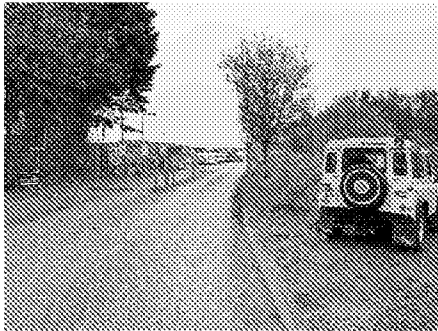
2.3 The site has no relationship to any heritage assets such as listed buildings or Conservation Areas with the nearest such properties sitting to Horsemere Green Lane or within the village to the east of Church Road. In addition, the site is not

within any fluvial flood zone according to the Environment Agency flood risk maps and is at very low risk from surface water flooding. Mature and dense tree screening limits views of the site from the east from Ford Road and Church Lane.

2.4 The aerial photograph below shows the relationship of the site to its immediate surroundings together with images of the site itself.



Application site



Access from the Church Road and views along southern access



Views through the site



View into site



Views looking north beyond the site

3.0 PLANNING HISTORY

3.1 The application site lies within the administrative area of Arun District Council. An inspection of Arun District Council's website reveals extensive planning history across the Rudford Industrial Estate with the history for this parcel of land (extending into the adjacent grassland) comprising:

- CM/24/16/PL – Change of use of grassland to storage area. Permission granted 17.01.2017.
- CM/6/14/PL – Change of use of unused land for use as open storage for caravans (Class B8) together with associated works. Permission granted 09.06.2014.
- CM/16/12 – Variation of Condition No 4 imposed on planning application CM/2/10 – re-siting of the entrance to car park. Permission granted 28.02.2013.
- CM/16/10 – Construction of electric kart tract and provision of parking for 12 cars. (Resubmission following CM/28/09). Permission granted 10.11.2010.
- CM/28/09 – Change of use to ecocentre with associated electric kart circuit. Refused 26.01.2010.
- CM/17/05 – Outline application for a 100% affordable residential development comprising a mix of flats and

dwelling with 2 retail units. Refused 10.05.2006. Appeal dismissed 23.08.2007.

- CM/6/00 – Temporary open-air storage for ex-military vehicles. Refused 24.03.2000.
- CM/3/85 – Outline application to refurbish existing derelict building for use as estate management office and maintenance materials store. Permission granted 20.02.1985.
- CM/4/83 – Outline application for 4no. Industrial Units. Refused 06.07.1983.
- CM/32/82 – Outline application for 4no. Industrial Units. Refused 01.09.1982.

4.0 PLANNING POLICY CONTEXT

National Planning Policy Framework (NPPF)

- 4.1 The NPPF sets its status within the planning process at paragraph 2 where it states: ***“The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions”***. The NPPF is therefore afforded weight in the decision-taking process whereby it sits as more up to date than the adopted development plan.
- 4.2 The NPPF reinforces the drive for sustainable development within paragraph 7 stating that ***‘the purpose of the planning system is to contribute to the achievement of sustainable development.’*** The pursuit of sustainable development continues to have three dimensions, now expressed as objectives, comprising an economic objective, a social objective and an environmental objective.
- 4.3 Paragraph 9 states that in pursuing sustainable development ***“Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local***

circumstances into account, to reflect the character, needs and opportunities of each area.” This paragraph is of paramount importance which identifies that the objectives of sustainable development outlined in paragraph 8 of the NPPF should be taken as a guide when determining what is sustainable, reinforcing that each planning decision has to be made on its own merits having regard to local circumstances.

- 4.4 The principle of proactively accepting new development is continued within paragraphs 10 and 11 of the NPPF. It is stated that where there are no relevant development plan policies or the relevant policies are out of date, planning permission should be granted unless the policies of the Framework indicate otherwise or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework considered as a whole. For decision taking, the NPPF states that this means approving development that accords with the development plan without delay.
- 4.5 Chapter 4 of the NPPF addresses decision-taking. Paragraph 38 states that ***‘Local planning authorities should approach decisions on proposed development in a positive and creative way.’***

- 4.6 Chapter 6 provides opportunity for economic development that enables businesses to invest, expand and adapt. Paragraph 80 sets that ‘significant weight should be placed on the need to support economic growth and productivity’, which should account for wider opportunities for development.
- 4.7 In respect of car parking provision, Chapter 9 of the Framework states that if setting local parking standards, Local Planning Authorities should take into account the accessibility of the development, its type, mix or use, the availability of and opportunities for public transport, local car ownership levels and an overall need to reduce the use of high emission vehicles.
- 4.8 Chapter 11 of the NPPF requires that development makes effective use of land with Paragraph 120 advocating that **“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions”**. Paragraph 123 requires that a positive approach is taken to applications for alternative uses of land.
- 4.9 The NPPF places great emphasis upon the creation of high quality buildings and places within Chapter 12. A number of tests for achieving high quality development are set out within paragraph 130, which includes ensuring that developments (in summary):
- a) function well and add to the overall quality of an area, not just for the short term but over the lifetime of the development;
 - b) are sympathetic to local character, including the surrounding landscape setting.
- 4.10 Chapter 15 of the NPPF gives consideration to the natural environment. Paragraph 174 states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils, by recognising the wider benefits of eco system services and by minimising impacts on biodiversity. This is continued within paragraph 179 which refers to biodiversity and states that local planning authorities should preserve and enhance biodiversity. It is also required that new development should adequately mitigate against any potential harm, with encouragement given to incorporating biodiversity enhancements in and around new development.

Local Planning Policy

- 4.11 The local Development Plan comprises the Arun Local Plan 2011 – 2031 which took effect in July 2018 and the Clymping Neighbourhood Plan 2015-2030 which was made in January 2016.

Arun Local Plan 2011 – 2031 (July 2018)

- 4.12 The local Development Plan comprises the Arun Local Plan 2011 – 2031 which took effect in July 2018.
- 4.13 The relevant Local Plan policies to this development proposal comprise:
- Policy SD SP1 – Sustainable development
 - Policy SD SP2 – Built-up Area Boundary
 - Policy D SP1 - Design
 - Policy D DM1 - Aspects of form and design quality
 - Policy T SP1 - Transport and Development
 - Policy W DM2 – Flood Risk
 - Policy QE SP1 – Quality of the Environment
 - Policy QE DM1 – Noise Pollution
 - Policy QE DM2 – Light Pollution
 - Policy LAN DM1 – Protection of Landscape Character

- Policy EMP SP1 - Strategic Economic Growth
- Policy EMP DM1 - Employment Land: Development Management.

- 4.14 Policy SD SP1 (Sustainable development) states that a positive approach will be taken to development proposals that reflect the presumption in favour of sustainable development and will work proactively to find solutions to secure development.
- 4.15 Policy SD SP2 (Built-up Area Boundary) requires the development within the boundary will be permitted subject to other policies of the Local Plan.
- 4.16 Policy D SP1 (Design) requires that new development makes efficient use of land whilst reflecting the characteristics of the local area in all aspects of design.
- 4.17 Policy D DM1 (Aspects of form and design quality) sets required criteria for the assessment of new development, having regard to character, appearance/attractiveness, impact, innovation, adaptability, crime prevention, trees and woodland, solar gain, public realm, layout, public art, density, scale and form.

- 4.18 Policy T SP1 (Transport and Development) requires development to minimise the use of the car, to provide for appropriate parking, and encourages healthy lifestyles.
- 4.19 Policy W DM2 (Flood Risk) ensures that development in areas at risk of flooding will only be permitted when certain criteria have been met. This should also take account of climate change.
- 4.20 Policy QE SP1 (Quality of the Environment) seeks to ensure that development does not have a significantly negative effect upon residential amenity, the natural environment or upon activities enjoyed by residents and visitors to the District. Where industrial development is proposed, this should be directed to land allocated for these uses.
- 4.21 Policy QE DM1 (Noise Pollution) ensures that noise generating development should be located in appropriate locations.
- 4.22 Policy QE DM2 (Light Pollution) requires that any outdoor lighting shall minimise the impact upon the landscape, be the minimum required for security and working purposes, minimises potential glare and spillage with consideration to

be given to powering such lighting by on-site renewable sources.

- 4.23 Policy LAN DM1 (Protection of Landscape Character) requires all development to respect the particular characteristics and natural features of a landscape character area.
- 4.24 Policy EMP SP1 (Strategic Economic Growth) provides for sustainable growth of differing economic sectors whilst also securing for the integration of other uses and forms of development where it fosters growth and provides for appropriately scaled development.
- 4.25 Policy EMP DM1 (Employment Land: Development Management) provide for sites outside of the built-up areas that would not result in detriment to public access routes and highways and is of a high standard of design, layout and landscaping appropriate to the context. Criteria also require development to have a sympathetic relationship to the surrounding characteristics of the landscape.

Clymping Neighbourhood Plan 2015-2030

- 4.26 The application site lies within the Neighbourhood Plan Designation Area for the 'Clymping Neighbourhood Plan'.

The Neighbourhood Plan was made in January 2016. Relevant policies to the consideration of the proposal comprise:

- Policy CPN 8 - Protection of Trees and Hedgerows
- Policy CPN 9 - Protection of Natural Habitats
- Policy CPN 11 - Quality of Design
- Policy CPN 12 - Reducing the risk of flooding
- Policy CPN 14 - Traffic and the Environment

4.27 Policy CPN 8 (Protection of Trees and Hedgerows) ensures that development that will damage or result in the loss of trees or hedgerows of arboricultural and amenity value will not be permitted. Encouragement is given to the retention of trees or hedgerows of good arboricultural and amenity value.

4.28 Policy CPN 9 (Protection of Natural Habitats) avoids harm to existing nationally and locally protected habitats unless the harm can be mitigated or equivalent alternative habitats are provided.

4.29 Policy CPN 11 (Quality of Design) requires new development must be of a high quality of design and protect and enhance local character having regard also to

the local environment, boundary treatments, materials, amenity, parking, detailing and low carbon usage.

4.30 Policy CPN 12 (Reducing the risk of flooding) sets out that new development must be designed and constructed to reduce the level of flood risk.

4.31 Policy CPN 14 (Traffic and the Environment) ensures that development does not have a detrimental impact on highway safety and the living conditions of residents, with provision for pedestrian and cycle networks.

Arun District Council Housing & Economic Land Availability Assessment (HELAA) (2020)

4.32 The Council undertook a review of the HELAA in 2019 with the subsequent report published in February 2020. Within the HELAA, the site (Referenced FO1B) as extending across the whole of the vacant area of 2.37ha has been evaluated for its potential for employment purposes. The site was however concluded as not being available given a planning permission granted for the use for caravan storage.

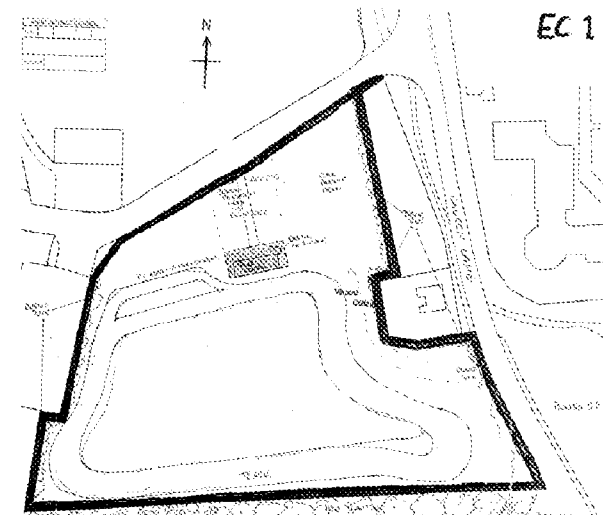
5.0 DETAILS OF THE PROPOSAL: USE, AMOUNT & SCALE OF DEVELOPMENT

- 5.1 In addressing the principle of development, the proposal seeks planning permission for the reuse of the land for the siting of storage containers to provide units for rent. This would reuse a currently vacant parcel that is already laid to hardstanding enclosed by earth mounds upon which is existing planting. The site would also be provided with two parking spaces as well as sufficient space for the manoeuvring of vehicles, with use made of the existing access from the public highway.
- 5.2 The site has been subject to previous permissions for Class B8 storage, notably caravan storage under reference CM/6/14/PL and as part of a Go Karting track under reference (CM/28/09). The land also forms part of the larger site identified for its employment potential within the Council's HELAA.
- 5.3 Inclusion in the HELAA accepts that future development could come forward on the site that could materially alter the appearance of the site whilst also contributing towards the local economy given the sustainable location.

Figure 1: Site layouts for previously approved schemes



CM/6/14/PL – Caravan Storage



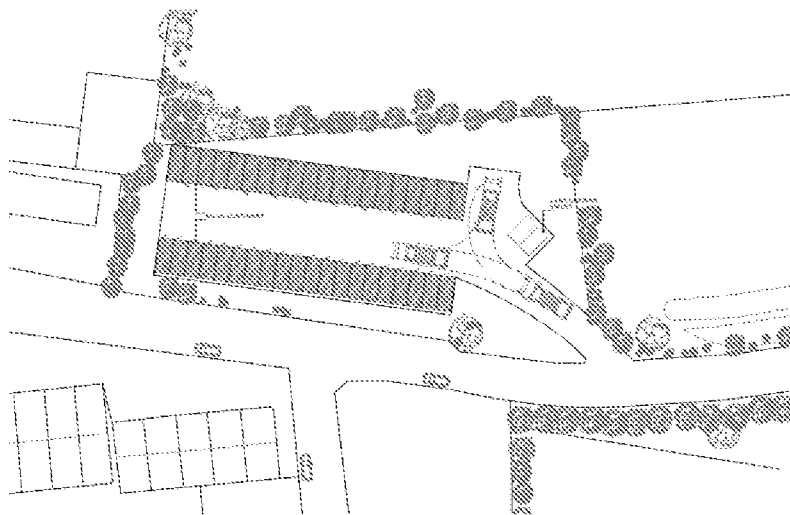
CM/28/09 – Go Karting Circuit

- 5.4 The site is additionally located within the Built-Up Area boundary for Clymping therefore the principle of reusing the land is established by Policy SD SP2 of the Local Plan.
- 5.5 Within Built Up Area boundaries such alternative uses will also be accepted where these have good access to the strategic lorry network. This site would use the same highway network as already used for the Rudford Industrial Estate therefore ensuring ease of access and no new access on to the highway is required. The principle of the development in this location should therefore be accepted subject to consideration of the detail.

6.0 LAYOUT, DESIGN & APPEARANCE

6.1 The NPPF attaches great importance to the design of the built environment with the Local Plan Policies D SP1 and D DM1 and the Neighbourhood Plan Policy CPN 11 – Quality of Design when considering matters of design. These policies place weight upon the effect of new development upon its surroundings having regard to matters of design, scale, materials, siting and layout as well as the relationship to neighbouring development and the setting in the landscape.

Figure 1: Site layout



6.2 The Arun Local Plan and the Clymping Neighbourhood Plan all contain criteria-based policies for addressing the design and appearance of new development as well as the impact of development upon the character and appearance of the local area. Many of these design criteria overlap. Given the detailed criteria, consideration is primarily given to Arun Local Plan Policy D DM1 (Aspects of form and design quality) with the criteria individually addressed below.

POLICY D DM1

Aspects of form and design quality

When considering any application for development the Council will have regard to the following aspects:

1. Character - Make the best possible use of the available land by reflecting or improving upon the character of the site and the surrounding area, in terms of its scale, massing, aspect, siting, layout, density, building materials (colour, texture), landscaping, and design features.

6.3 The proposed development would make efficient use of an area of land that is sited within an accessible location and within a Built-Up Area boundary. The application site sits within a context of industrial and commercial development characterised by a mix of external storage sites and

commercial and industrial buildings in differing uses, and of differing scales, massing, appearance and building materials.

6.4 The use of the land for container storage would simply form part of the industrial estate and part of the variety of uses that are expected to be found in these locations. The proposal would have minimal impact upon the wider character of the area.

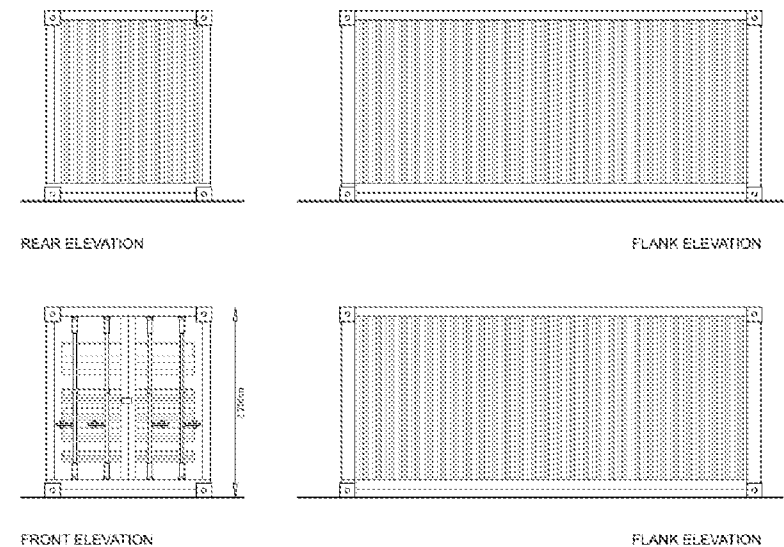
6.4 Within the site, the land is already laid to hardstanding with sufficient space for the manoeuvring and parking of vehicles ensuring that all vehicles enter and leave the site in a forward gear. The development would therefore not overdevelop the site nor appear disproportionate to the surrounding structures.

6.6 The only structures on site above ground level would be the presence of storage containers which are functional in their external appearance and form. The site would also benefit from the retention of the earth mounds that enclose the site to reduce the prominence of the development within the approach to the industrial buildings beyond. The proposal accords with criteria 1.

2. Appearance/attractiveness - Demonstrate a high standard of architectural principles, use of building materials, craftsmanship and hard and soft landscaping to reflect the local area.

6.7 Criteria 2 overlaps with Criteria 1, both referring to design matters having regard to design, materials and landscaping. It is reiterated that the site is functional in appearance and the containers have a pre-fixed external appearance that is function in form. The site is also seen within an industrial context as opposed to a landscaped area. Criteria 2 in terms of craftsmanship and landscaping is not relevant.

Figure 2: Container elevations



3. Impact

Have minimal impact to users and occupiers of nearby property and land. For example, by avoiding significant loss of sunlight, privacy and outlook and unacceptable noise and disturbance.

- 6.8 The development has minimal impact upon amenity. The site is detached from any residential properties and would sit alongside existing industrial and commercial units that have external storage therefore negating the need to protect privacy and amenity. This use would inevitably be a quiet use with minimal noise impacts arising, comprising vehicle movements only.
- 6.9 The nearest residential properties sit to the northeast and southeast and detached from the development. The development could be visible in longer views from these residential properties; however the impact would be minimal given the intervening planting and distance.
- 6.10 The development would have no unacceptable amenity impacts noting that the site has been identified for employment uses through the Local Plan process therefore an acceptance of an industrial use in this location has already been considered by the Local Planning Authority in relation to the impacts on the nearest residential properties. The proposal would therefore accord with

criteria 3.

4. Innovation

Raise standards of design by embracing appropriate innovative design, new technologies and construction techniques, where a development proposal has the potential to do so.

- 6.11 The development by virtue of its proposed use would not be embracing new technologies. This criterion is therefore not relevant.

5. Adaptability

Acknowledge diversity and difference. Buildings and places should be flexible to future adaptation, including the changing needs of occupants (for example ageing users, family circumstances), changes in wider work and social trends, and be able to accommodate potential differing uses of public space.

- 6.12 The development is specifically designed to meet the needs of the business and does not include public space therefore this criterion is not relevant.

6. Crime prevention

Provide security measures that make places feel safer. This shall be achieved through natural surveillance and human presence by locating buildings and play areas

along public routes and spaces, and making a clear division between private and public land to foster a mutual protection through territorial belonging. With respect to crime prevention, regard shall be had in particular to the document 'Secured by Design' and the 'Safer Places - The Planning System and Crime Prevention'.

- 6.13 The development would provide for a secure and defined site enclosed by a gated access and earth mounds to the north and south. The site has a modest entrance and therefore appears more discrete in the landscape. The proposal accords with criteria 6.

7. Trees and woodland

All new development will be expected to incorporate existing and new tree planting as an integral part of development proposals.

- 6.14 Trees and hedgerows are limited to the perimeters of the site with the area mainly laid to scrub. No trees are therefore affected. The proposal accords with criteria 7.

8. Solar gain

Within the constraints of the site and local context development proposals should, maximise sunlight and passive solar energy. Ideally development should be positioned (within a 15-20 degree margin) broadly south, with streets having an east-west pattern.

- 6.15 The orientation of the site is prefixed and the proposed use does not require consideration of solar gain. This criterion is therefore not relevant.

9. Public realm

Provide or enhance layouts, streets and public spaces so that they are attractive, socially inclusive, safe and secure, adaptable, with appropriate provision for planting, street furniture, and facilities for bicycle storage to create a place with attractive and successful outdoor areas.

- 6.16 The development would have no contribution to the public realm other than being visible within the context of the industrial estate and seen against the backdrop of adjacent users. The development does not provide any public realm features such as streets and public spaces therefore criterion 9 is not relevant.

10. Layout – movement

Utilise existing networks or improve access via delivery of a variety of integrated networks, to and from residential areas, commercial zones, open spaces, facilities and public transport. Development schemes should carefully consider walking and cycling as an integral part of the overall design concept.

- 6.17 Access to the site uses the established industrial estate road which already serves the site with clearly defined junctions that provide for good highway visibility. The site is also accessible by cycling or by walking with Horsemere Green Lane, Ford Road/Church Lane containing pedestrian footways along their length. Criteria 10 would therefore be met.

11. Layout – legibility

Deliver or contribute to the ease of navigation within a new or existing development scheme through use of focal points (landmarks, gateways, vistas, corner buildings, active edges, existing topography), and/or a variety of detail within the public realm (sculpture, planting, street furniture, building materials, building detail, signage).

- 6.18 The development is not positioned or required to provide a focal point to the public realm. Within the site, the layout is legible enabling orientation. The development has no need to provide public realm features such as sculptures or street furniture. The requirements of criteria 11 would be met.

12. Public art

Public Art should be incorporated into schemes where there is capacity to do so. Public art can encompass a wide variety of elements to include art as part of the design of buildings and developments, landscape and planting, street furniture, signage and lighting in the public realm which is accessible to all. This can also result in physical, permanent artworks and sculptures.

- 6.19 The provision of public art is not relevant to the development proposed.

13. Density

The density of new housing will make efficient use of land while providing a mix of dwelling types and maintaining character and local distinctiveness. Higher densities will be more appropriate in the most accessible locations. Proposals should take into account the density of the site and its surroundings. The density of large sites should be varied to guard against uniformity.

- 6.20 The development is not for a residential use and has no impact upon the density of development in this location.

14. Scale

The scale of development should keep within the general confines of the overall character of a locality unless it can be demonstrated that the contrary would bring a substantial visual improvement.

- 6.21 The change of use of land for storage would be in keeping with the immediate environ of the Rudford Industrial Estate

in terms of external appearance and form sitting adjacent to existing industrial units. The scale of the proposal would accommodate only part of the overall larger vacant site at the entrance to the estate and would be seen against a backdrop of existing premises. The scale of premises varies across the estate therefore the proposal would not appear disproportionate or out of keeping. The proposal would therefore accord with criteria 14.

15. Aspects of form and design quality

Development should also comply with the Arun District Council Design Guide.

- 6.22 Matters regarding scale and massing have been addressed in relation to criteria 1. It is not considered that criteria contained within the Arun Design Guide are relevant to this proposal which does not contain buildings, with the simply requiring the change of use of the land for the siting of containers, which themselves are removal units. Notwithstanding this, the proposal is considered to have an acceptable impact upon the character and appearance of the area.

Clymping Neighbourhood Plan Policy CPN11

- 6.23 The Clymping Neighbourhood Plan Policy CPN 11 similarly requires consideration of how development would integrate into the local built environment, respect boundary treatments, use high quality materials. These criteria have already been addressed with respect to matters of design and materials.
- 6.24 Policy CPN 11 also ensures that new development adopts principles of sustainable urban drainage and provides for on-site parking and refuse/recycling storage. It is confirmed that the proposal would accord with these criteria whereby no change is required to the level of hardstanding presently found on the site. As such drainage run-off would be no greater than existing greenfield rates.
- 6.25 The site also provides parking with sufficient space for turning of larger vehicles. The proposal accords with Policy CPN 11 and takes opportunities for ensuring that the proposal appropriately functions and also would assimilate sensitively into the appearance of the area.

6.26 In having regard to the siting, design, scale and external appearance of the development, it is considered that the criteria to the Arun Local Plan Policies D SP1 (Design) and D DM1 (Aspects of form and design quality) as well as the Clymping Neighbourhood Plan Policy CPN 11 are all met.

Natural Environment

6.27 The NPPF requires that local planning authorities should preserve and enhance biodiversity and that new development should adequately mitigate against any potential harm. Locally, Waste Local Plan Policy W14 (Biodiversity and Geodiversity), Local Plan Policies ENV SP1 (Natural Environment), ENV DM4 (Protection of Trees) and ENV DM5 (Development and biodiversity) as well as Neighbourhood Plan Policy CPN 8 (Protection of Trees and Hedgerows) all cumulatively seek to protect the natural environment.

6.28 The site is not located within any area designated for its ecological interest and does not contain any trees subject of a Tree Preservation Order nor protected by virtue of any Conservation Area designation. The site does have vegetated boundaries that are not impacted by the

proposed development and would continue to provide for biodiversity. The trees and hedgerows have opportunity to accommodate protected species such as bats and nesting birds and therefore the development recognises the important of retaining these natural features for their biodiversity value and also to contribute to the landscape character of the area.

6.29 The site has some natural encroachment of scrub with the potential to provide further habitats. However it is acknowledged that this site has been considered for development through the HELAA therefore it is accepted that there would be a change to the vegetated coverage on the site in due course.

6.30 The development does not require the demolition of any buildings which could have accommodated protected species therefore is sensitive to the natural environment. As such, there is no conflict with the relevant development plan policies or advice set out in the NPPF addressing biodiversity, with the proposal also ensuring that the characteristic landscape of the locality would be safeguarded.

6.31 The site sits within an area that is at low risk from fluvial flooding and low risk from pluvial flooding. Drainage from the site ensures that no new impacts arise in accordance with Policy W DM3 (Sustainable Urban Drainage Systems) of the Arun Local Plan and also Policy CPN11 of the Clymping Neighbourhood Plan.

6.32 Policy W DM1 (Water Supply and Quality) ensures that development can be provided with a sufficient water supply which does not cause detriment to supplies elsewhere. The proposal is for storage only therefore a water supply is not required. In any event were a connection to the water supply necessary, this would be agreed with the local water authority under the Water Industry Act 1981.

6.33 Finally, it is accepted that the site would be located within proximity to existing industrial premises that already have localised impacts through the activities taking place or upon the local highway network. However with the site identified for further employment uses, it is not considered that the scheme would result in any unreasonable level of disturbance to the environment and/or local communities

from the processes being undertaken or impacts on the local highway network.

7.0 ACCESS AND PARKING

- 7.1 Arun Local Plan Policy T SP1 (Transport and Development) and Neighbourhood Plan Policy CNP14 (Traffic and the Environment) ensures that development meets its transport demands and is designed to minimise additional traffic generation, provides for safe and easy movement and meets parking requirements.
- 7.2 The development is a traffic generating use however the level of vehicular movements would not generate significant numbers of additional vehicular movements to the area ensuring no new interruption to the free flow of traffic on the highway. The proposal also utilises land that already has access into the site which provides for appropriate visibility onto the internal highway that serves the estate.
- 7.3 The site provides hardstanding for the proposed siting of the containers which is sufficient in size to also meet the parking requirements on the site. With no new harm to the local highway network and with the site able to accommodate its parking requirements, the development is

considered to accord with the relevant policies pertaining to highway and transport matters.

8.0 CONCLUSION

- 8.1 The proposed development seeks the change of use of the land to provide an area for the siting of storage containers for rent that would also utilise the existing site access.
- 8.2 The development would bring forward part of a site recognised within the Council's HELAA as having potential for future employment development and also sits within the Built-Up Area boundary for Clymping ensuring that there is no encroachment into the countryside. The reuse of this vacant parcel would make efficient use of land within the built up area and provide a small business use contributing towards the local economy.
- 8.3 The site would also sit alongside, and be viewed in conjunction with, the existing Rudford Industrial Estate therefore being commensurate with the immediate surroundings and its sustainable location. The character of the area is formed by a mix of commercial and industrial buildings in differing uses, and of differing scales, massing, appearance and building materials. As such the development would not appear out of keeping.
- 8.4 The development would generate minimal impacts to the public domain. Existing landscape boundaries to the wider site are not impacted therefore retaining biodiversity interest.
- 8.5 The proposal would bring economic benefits through the provision of a storage business, which in turn would support social wellbeing through generation of an income. With no harm also to the natural environment, the proposal would accord with the three objectives of sustainable development.
- 8.6 The proposal complies with the NPPF and the relevant policies contained within the Arun Local Plan and the Clymping Neighbourhood Plan. In having regard to the presumption in favour of sustainable development planning permission will be granted.