



APPLICATIONS & APPEALS SERVICES

**Formalisation of Change of use of
land to open storage
(Use Class B8)**

**Land adjacent to Unit H21
Rudford Industrial Estate
Ford, Arundel
BN18 0BF**

PLANNING, DESIGN AND ACCESS STATEMENT

Ref: NJA/18/237

December 2018



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1.0 INTRODUCTION & BACKGROUND

1.1 This application seeks permission for the formalisation of change of use of land adjacent to Rudford Industrial Estate to open storage. The site is to the east of the main site, between the existing site compound and the Ford Road.

1.2 This supporting Planning, Design & Access sets out the detail of the proposal, which is described and appraised having regard to the following aspects:

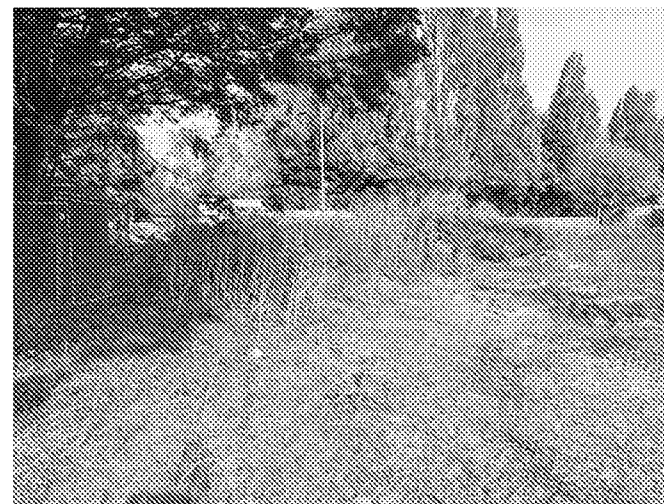
- Physical Context – explains the physical context of the site and its surroundings;
- Planning Context – relevant planning history of the site and broad policy requirements;
- Use – the purpose of the proposed development;
- Amount – the extent of development on the site;
- Scale – details of the physical size of the proposed development;
- Layout – the relationship of the proposed development to the site and its setting;
- Appearance – details of materials, style and impact upon the existing and neighbouring properties;

- Landscape – impact of the proposal on the existing landscape and proposed planting and surfacing;
- Access – access to the proposed development and associated parking;

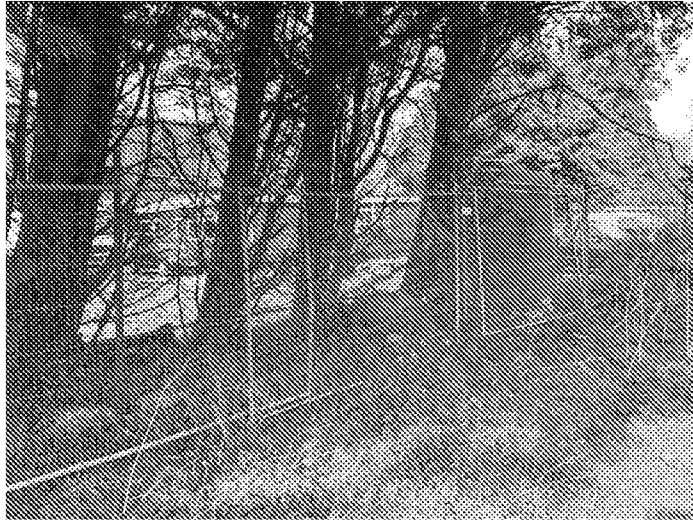
1.3 This Statement will demonstrate that the proposed development accords with the relevant planning policies and is acceptable in all respects.

2.0 PHYSICAL CONTEXT

- 2.1 The site is located within the established Rudford Industrial Estate. Rudford Industrial Estate is located to the north of the village of Clymping, with the village of Ford to the north.
- 2.2 Access to the site is via an established access from Ford Road, which runs between the A259 to the south and the A27 to the north. Ford railway station is located approximately 1.3 miles to the north.
- 2.3 Directly north of the site is Ford Prison, with the former Ford airfield, Viridor Waste facility and further industrial buildings to the north east.
- 2.4 There are a mix of commercial and industrial buildings within the site, which comprise both large warehouse type units, small lock up units and some outside storage. Gated access is provided to the front of the site and the boundaries are kept by secure fencing.
- 2.5 Given the mature hedgerow and tree planting to the front of the site, together with earth bunding, the site is not readily visible from Ford Road.
- 2.6 The application site itself is located to the east of the industrial estate. The application site is part of the curtilage of the industrial estate, well enclosed by fencing and includes an existing building and hard surfaced tracks.
- 2.7 Included below are a number of photographs of the site, which provide further context.



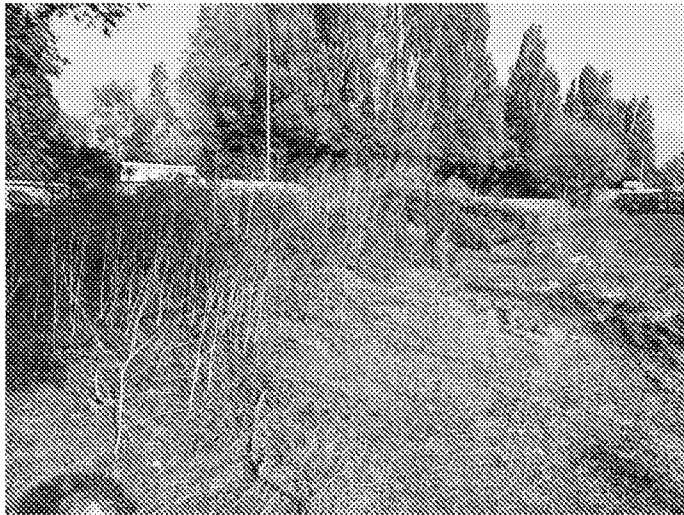
View across site towards access road and landscaping screen beyond



Existing industrial buildings to the west of the site



Existing views on site



Internal view across site showing spoil pile



Existing fencing to southern boundary

3.0 PLANNING HISTORY & CONSTRAINTS

3.1 The Rudford Industrial Estate lies within the administrative boundary of Arun District Council. A review of the of the Council's planning records and constraints has been undertaken.

Constraints

- Countryside (outside of the defined settlement boundary)

Planning History

3.2 There is extensive planning history relating to the wider industrial site, which all support uses within the site for industrial purposes. This includes lawful uses ranging from B1 Business, B2 General Industrial and B8 Storage and Distribution.

3.3 Notably there has been a refusal for additional development adjacent to Rudford Industrial Estate, planning reference F/16/15/PL. This would have extended development beyond the confines of the existing industrial estate, which was not supported by the Council.

3.4 The proposal relates to the provision of outside storage space, to off-set the loss of open storage, following a recent planning approval. This permission granted consent for the construction of a new building for a flexible B1 / B8 use As such, its provision should not be viewed in the same way as F/16/15/PL.

4.0 PLANNING POLICY CONTEXT

National Planning Policy Framework (NPPF)

- 4.1 The NPPF sets out the Government's key objectives for the planning system, confirming the presumption in favour of sustainable development which sits as a 'golden thread' running through the NPPF. Paragraph 8 states that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways: economic, social and environmental.
- 4.2 The Framework seeks to ensure that planning applications are determined in accordance with the development plan.
- 4.3 Paragraph 11 of the NPPF states that at the heart of the Framework is a presumption in favour of the sustainable development which means that Local Planning Authorities should approve proposals that accord with the Development Plan without delay. Where the development plan is absent, silent or out of date planning permission should be granted unless **'any adverse impacts of doing so would significantly and demonstrably outweigh the benefits,**

when assessed against the policies in this Framework as a whole; or specific policies in the Framework indicate development should be restricted'.

- 4.4 Paragraph 80 of the NPPF confirms that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 4.5 Paragraph 82 goes on to confirm that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

Local Plan Policy

- 4.6 Local Plan policy is contained within the newly adopted Arun District Local Plan 2011-2031 and Clymping Neighbourhood Plan 2015 - 2030.

Clymping Neighbourhood Plan

- 4.7 Relevant policies in the Neighbourhood Plan include; Policy 4, Policy 7, Policy 11 and Policy 14.
- 4.8 Policy 4 states that proposals to upgrade or extend existing employment sites will be supported provided that:
- the impact on the amenities enjoyed by occupants of surrounding properties is acceptable; and
 - they do not compromise the character of the area or openness of the countryside or beach; and
 - traffic impact is acceptable in terms of highway safety and living conditions of residents. Proposals should include a traffic impact analysis or transport assessment which is proportionate to the development and demonstrates traffic impact and measures which may be taken to mitigate impacts.

- they comply with other policies in this Neighbourhood Plan.

There will be a strong presumption against the loss of commercial premises or land which provide employment and are of demonstrable benefit to the local community.

- 4.9 Policy 7 states that all development will be considered with regard to the need to protect the open landscape character of the countryside and beach. The Clymping Character Assessment will be used as a reference to assess the impact of proposals.
- 4.10 Policy 11 states that new development, including, rebuilding or alterations, must be of a high quality of design and protect and enhance local character as assessed by the Clymping Character Assessment.
- 4.11 Policy 14 relates to highway safety and capacity and states that development which will have a detrimental impact on highway safety and the living conditions of residents will be resisted. Consideration will be given towards securing planning obligations which meet the national policy guidance in NPPF paragraph 204, in relation to increasing highway

capacity, traffic management and traffic calming measures which will make the development acceptable.

Local Plan 2011-2031

- 4.12 It is considered that the most relevant policy in the determination of this application are Policies EMP SP1 and EMP DM1, which confirms that the Council, with partners, will promote the sustainable growth of the District's economy by supporting the provision of a flexible supply of land to meet the varying needs of different economic sectors. Sufficient employment sites and premises will be safeguarded in order to meet the needs of the economy in Arun to 2031 to support job creation, the needs of modern business and the attractiveness of the District as a business location.
- 4.13 Policy EMP DM1 confirms that in order to promote entrepreneurialism and job security, the Council will seek to protect and enhance existing employment sites and premises in order to maintain a supply of good quality commercial sites and premises to meet the needs of businesses and the local economy.

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

5.1 At the heart of the National Planning Policy Framework (NPPF) is a presumption in favour of sustainable development (paragraph 11). For decision taking, the NPPF states that this means approving development that accords with the development plan without delay.

5.2 Policy EMP DM1 confirms that the Council will seek to protect and enhance existing employment sites and premises in order to maintain a supply of good quality commercial sites and premises to meet the needs of businesses and the local economy. The Council will promote and support positive measures to upgrade existing employment areas through:

- a. Supporting appropriate proposals for development/re-development of employment floorspace, upgrading or modernisation of existing premises and/or proposals which make more efficient use of under-used employment sites and premises;
- and

- b. Working with landowners and developers to achieve better management of employment areas, including measures which increase sustainability and reduce crime.

Use / Principle of development

5.3 The proposal seeks permission for the formalisation of change of use of land to the east of the existing industrial estate. It comprises a small portion of land between the existing industrial estate and Ford Road. This area of land is already fenced off and is sandwiched between existing units and concrete depot/sales yard.

5.4 The industrial estate comprises a well-established brownfield site, with established commercial and industrial uses surrounding the site. The Council appear to be supportive of development within the established Industrial Estate boundaries and both the Local Plan and adopted Neighbourhood Plan seek to protect and enhance existing employment sites, such as the Rudford Industrial Estate.

5.5 The Council's own policy EMP DM1 supports the enhancement of existing sites to ensure the provision and

retention of good quality commercial sites to meet the needs of business.

- 5.6 The Council have recently granted permission within the wider estate for a new building, to be used for B1 and B8 purposes, resulting in the loss of an area of land for open storage. Accordingly, the proposal seeks to address this loss of floorspace within the site with a proposed small extension to the site.

Amount & Scale of the development

- 5.7 The proposed development would comprise the formalisation of change of use of a small area of land to the east of the main estate. The land is effectively scrub land and appears to have been used for storage of spoil. The site is adjacent to a restricted access road, which at present only allows vehicles to exit the site.
- 5.8 The site is also largely fenced at present, with palisade fencing noted. It is proposed that this be maintained and supplemented to ensure a secure compound is created for the storage of cardboard and other paper related products.

- 5.9 As noted, the use would comprise cardboard storage, which is bailed and compressed to minimise space required for storage, prior to it being recycled. It comprises a positive use of land, with limited movements associated and activity on site.

- 5.10 The proposed palisade fencing would be approximately 1.8 metres to match that existing. The site would be accessed via secure gates, which will be placed on the northern boundary of the site, adjoining the existing service road.

6.0 LAYOUT, DESIGN & APPEARANCE

- 6.1 The NPPF sets at Paragraph 128 that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.
- 6.2 The appearance of the application site does not at present make a positive contribution to the industrial estate. It is reflective of its siting adjacent to a busy industrial estate and occasional use for temporary storage of spoil, which has of course since been cleared.
- 6.3 The proposed use of the land would comprise open storage, therefore, only limited changes to the layout and appearance of the site would occur. The layout would change to allow for a dedicated secure access via a new gateway.
- 6.4 The bailed cardboard would be stacked but limited in height due the nature of the material and also to ensure that the site and associated storage would not be visible, other than from the service road to the north and the adjacent industrial uses.
- 6.5 The existing site offer no landscape or visual amenity value. It appears as an underutilised area of land. It does not serve a useful purpose and does not comprise high-quality countryside land.
- 6.6 The proposed use of the site would therefore have very limited changes to its appearance. The existing fencing would largely be maintained and supplemented to provide a secure storage area.
- 6.7 The site layout would also allow for machinery / plant to bring in the material to be sorted, clear of the service road. The plans provided demonstrate proposed new entrance gates to ensure that vehicles can manoeuvre safely within the site. This is not only beneficial from a highway safety point of view but will also ensure that materials can be managed within the site and the site serviced to a high standard.

6.8 Whilst not visible from the wider area, the proposal would comprise an acceptable form of development from a visual perspective and would provide a much needed outside storage area to support the existing industrial estate.

Residential amenity

6.9 The Local Plan and NHP policies seek to protect neighbouring residential amenity, which is generally considered to address matters of privacy, access to sunlight and daylight, noise, vibration, and pollution.

6.10 In this instance, the proposal seeks permission for use of the land for the storage of cardboard. Whilst it is accepted that some movements and activity will take place on the site these will not impact upon any residential amenities given generous separation distances. The land already has evidence of storage uses.

6.11 No floodlighting is proposed as part of this application, therefore, no additional harm could result.

6.12 Given that this parcel of land as outlined above is sandwiched between existing industrial uses and is itself already fenced off, it naturally leans towards the continuation of an active use. The proposed B8 storage of paper products is low risk and given it is part of a recycling chain should be supported in principle.

7.0 ACCESS AND PARKING

7.1 Paragraph 108 of the NPPF confirms that in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users; and
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

7.2 Paragraph 109 goes on to confirm that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

7.3 All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or

transport assessment so that the likely impacts of the proposal can be assessed.

and the employees would as before park in the same parking areas on the estate.

7.4 Means of access would be provided via the established access road from the Ford Road. This provides wider access to the A27 trunk road to the north, and the A259 which provides local links to surrounding villages and towns.

7.5 The use of the site would remain largely as existing, in terms of trip generation. The majority of movements to and from the application site would come from within the industrial estate, where materials would be processed. It is not thought that additional highway movements beyond the industrial estate would occur. As such, a Transport Statement is not considered necessary and the proposal would not have any detrimental impact upon highway capacity or safety.

7.6 In terms of the parking provision, this would largely remain as existing. The industrial estate comprises a large area, with many on-site parking spaces clear of the public highway. As such, the on-site parking provision would be acceptable. The existing site has no parking on it with parking adjacent on estate roads. The same applies in this case that all the land would be allocated as before to the storage use

8.0 CONCLUSIONS

- 8.1 Planning permission is sought for the formalisation of change of use a small parcel of land lying to the east of the existing industrial estate.
- 8.2 The site forms an area of land adjacent to industrial buildings within Rudford Industrial Estate to the west Ford Road to the east. A site that is already fenced off and sandwiched between adjoining uses and doesn't contribute to the character of the surrounding countryside.
- 8.3 The need for the land to accommodate outside storage of paper products results from a recent permission granted by the Council for the construction of a building proposed for flexible industrial uses. While the new building will enhance the offer of the industrial estate there is still a need to accommodate the B8 storage area.
- 8.4 This can be accommodated on the application site, which is suitably located to compliment the existing estate. The proposed site is not visible from any public viewpoints, being enclosed by existing fencing and dense landscaping on the

site boundaries. It would not result in the loss of high-quality countryside land nor would it detract from the intrinsic character and beauty of the countryside.

- 8.5 It is hoped that the Council feels able to support the proposal and grant planning permission to allow existing storage with Rudford Industrial Estate to continue.