

TERRESTRIA LIMITED

DUDMAN INVESTMENTS LIMITED

UNIT H6 RUDFORD INDUSTRIAL ESTATE

Ford Road

Ford

Arundel

West Sussex

BN18 0BD

DEVELOPMENT OF A CONCRETE BATCHING PLANT

PLANNING STATEMENT

NOVEMBER 2019

INTRODUCTION

This Planning Statement is provided in support of a planning application prepared and submitted by Terrestria Limited on behalf of Dudman Investments Limited ("DIL", "the Company") to develop a concrete batching plant on land owned by the Company at Rudford Industrial Estate, Ford (Unit H6).

The proposed development comprises an IMER Oneday mobile concrete batching plant consisting of an aggregate feed hopper and small cement silo linked to a mixing unit. The mixing unit is equipped with an expansion chamber (airbag) which suppresses dust generated by the aggregates and cement after entering the mixer.

The existing use of the site is for B2 (General Industrial) and B8 (Storage and Distribution) uses. The proposed use for a concrete batching batch would be a B2 use and as such there is no material change of use. The operational development will, however, require planning permission.

The Applicant

Dudman Investments Limited is part of the Dudman Group of Companies.

Originating as a haulage firm, the Dudman Group of Companies has grown and adapted with the industry into an independent group that supplies aggregates and ready-mixed concrete across the South coast using its own haulage fleet, including tipplers, articulated lorries, mixers and sweepers.

The Company operates out of depots across Sussex and Hampshire and prides itself on being an independent aggregate producer that offers a wide range of construction products.

Dudman Readymixed Concrete Limited operates to a quality management system designed to meet the requirements laid down in BS EN ISO 9001: 2015 and the QSRMC Quality and Product Conformity Regulations.

It is the Company's policy to operate to these standards and any other applicable requirements and to continually improve the effectiveness of the quality management system through monitoring, internal communication, audit and review.

The Company complies with all legislation and obligations relevant to the production of ready-mixed concrete, including the Health and Safety at Work Act and the COSHH regulations.

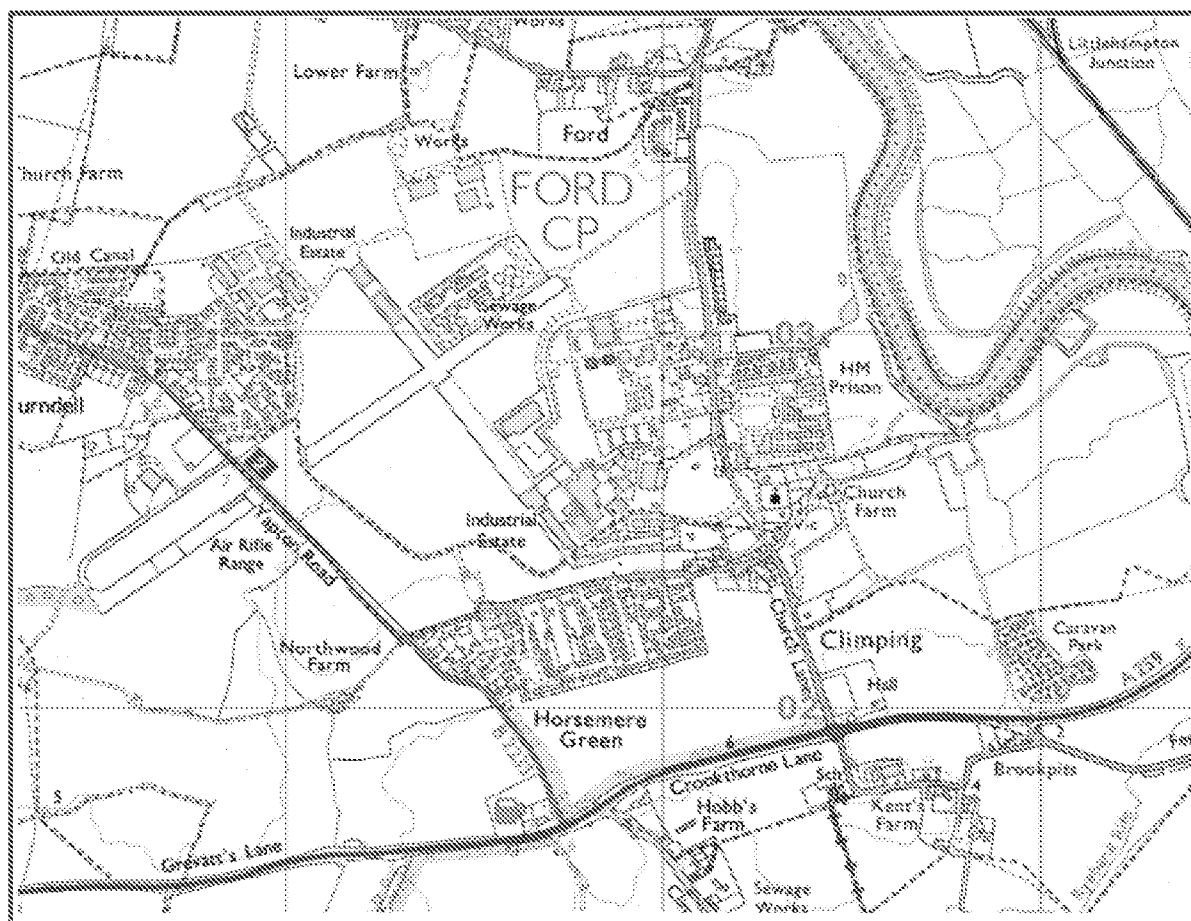
THE SITE

The application site address is Unit H6 on the Rudford Industrial Estate, Ford Road, Ford BN18 0BD.

Rudford Industrial Estate lies some 2km west of Littlehampton and some 4.5km south-southwest of Arundel in the County of West Sussex and within the administrative area of Arun District Council (Figures 1 and 2).

The Rudford Industrial Estate extends to some 10 hectares and comprises a mix of light commercial uses. It is situated on land which lies at the southern end of the former Ford Aerodrome. The airfield is home to a popular market, an open prison and a number of industrial estates including waste processing operations. The airfield is predominately open land and has been allocated as a strategic site for housing in the Arun Local Plan, looking to deliver at least 1,500 dwellings in the period to 2031¹.

FIGURE 1
Rudford Industrial Estate



¹ Arun Local Plan 2011-2031, Policy SD8

FIGURE 2
Rudford Industrial Estate - Aerial Photograph (Google)



The Industrial Estate has two access points on to Ford Road/Church Lane, which runs immediately to the east of the Estate and links with the A259 some 850 metres to the south. The A259 then runs to the north of Littlehampton (to the east) and by-passes Bognor Regis to the west. The A259 is identified as a "Strategic Lorry Route" within the County.

The application site lies on the eastern boundary of the Estate and is accessed via the northern main Estate access, some 155 metres from its junction with Ford Road.

The site is surfaced and has a total area of some 2,120 square metres. The proposed concrete batching plant will be sited at the southern end of the site (Drawing DG/RIE/PA-03).

The current permitted use of the application site falls within Classes B2 and B8 of the Town and Country Planning (Use Classes) Order 1987, which are,

B2 General industrial - Use for industrial processes other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste).

B8 Storage or distribution - Including open air storage.

The proposed use of the application site for a concrete batching facility is a B2 use and as such there is no material change of use. However, the operational development requires planning permission.

THE PROPOSED DEVELOPMENT

It is proposed to construct and operate a concrete batching plant at the site.

The batching plant will mix aggregates, sand, cement and water in various ratios in order to produce different grades of concrete. All products will be designed and manufactured to comply with relevant British and European standards.

BS 8500 is the British Standard for specifying and producing concrete and is the complementary British Standard to BS EN 206. BS 8500 is split into two parts. Part 1 covers specification and gives guidance to the specifier whilst Part 2 covers the constituent materials in concrete and contains the information required by the concrete producer.

Cement will be stored in a single silo which will have a height of 9.13 metres. This silo is the highest element of plant making up the batching plant. Cement will feed automatically into the mixing unit. Aggregate will be fed into the mixing unit from a feed hopper which will be supplied by a wheeled, loading shovel which will transport sand and other aggregate from storage bays sited close to the batching plant.

Drawing DG/REI/PA-03, which accompanies this application, shows the proposed layout of the plant within the overall site.

Drawing DG/REI/PA-04 shows cross-sections through the batching plant and includes dimensions.

The Company operates a fleet of mixer trucks which will be loaded directly from underneath the mixing unit.

The Company is a significant supplier of concrete to users within West Sussex and further afield along the south coast. Other concrete operations run by the Dudman Group of Companies are sited at Chichester (Kingsham Quarry), Midhurst (Minsted Sandpit), Shoreham (former cement works), Shoreham Wharf and Storrington (Rock Common Quarry) (Figure 3).

There is significant growth planned within the immediate area (as detailed in the adopted Local Plan) and this batching plant is intended to service the increased demand for concrete associated with this growth.

FIGURE 3
Dudman Concrete Batching Plants



ENVIRONMENTAL CONTEXT

Geology

The Industrial Estate (within which the application site is situated) generally sits above bedrock of Upper Cretaceous age (Upper Chalk). Across the former airfield the chalk is overlain by brickearth (mainly silts with occasional gravels). Moving east towards the River Arun the superficial deposits change to raised beach deposits and then alluvium associated with the river (Figure 4).

FIGURE 4
Extract from BGS Sheets 317/332



Flood Risk

As shown on Figure 5 the site has a less than "very low" risk of flooding from rivers or the sea, whilst the risk of flooding from surface water is negligible (Figure 6).

FIGURE 5
 Environment Agency - Flood risk from rivers or sea

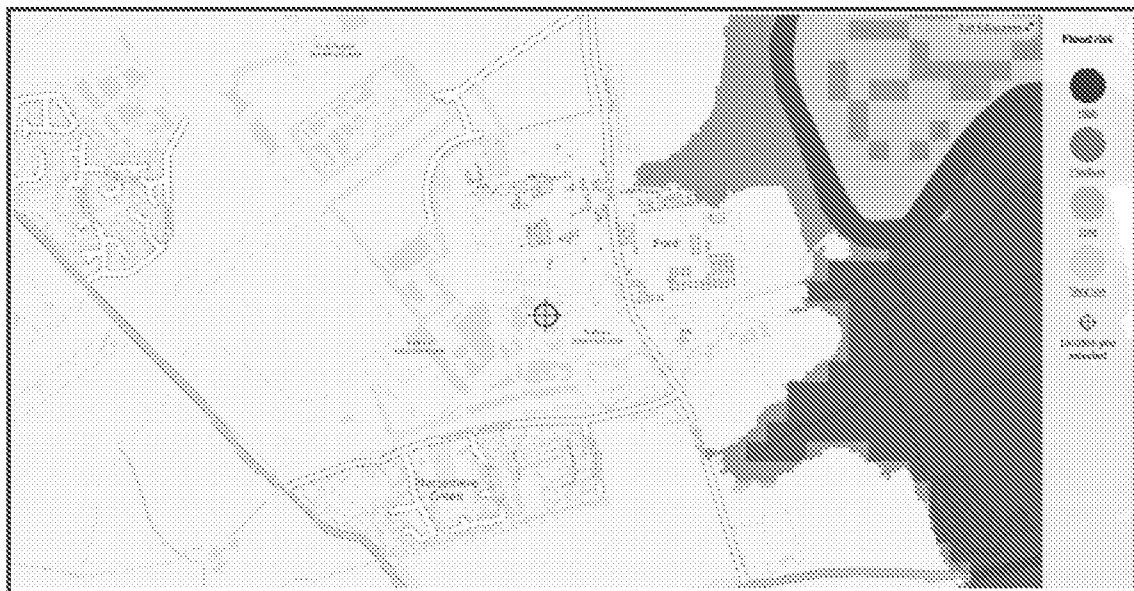
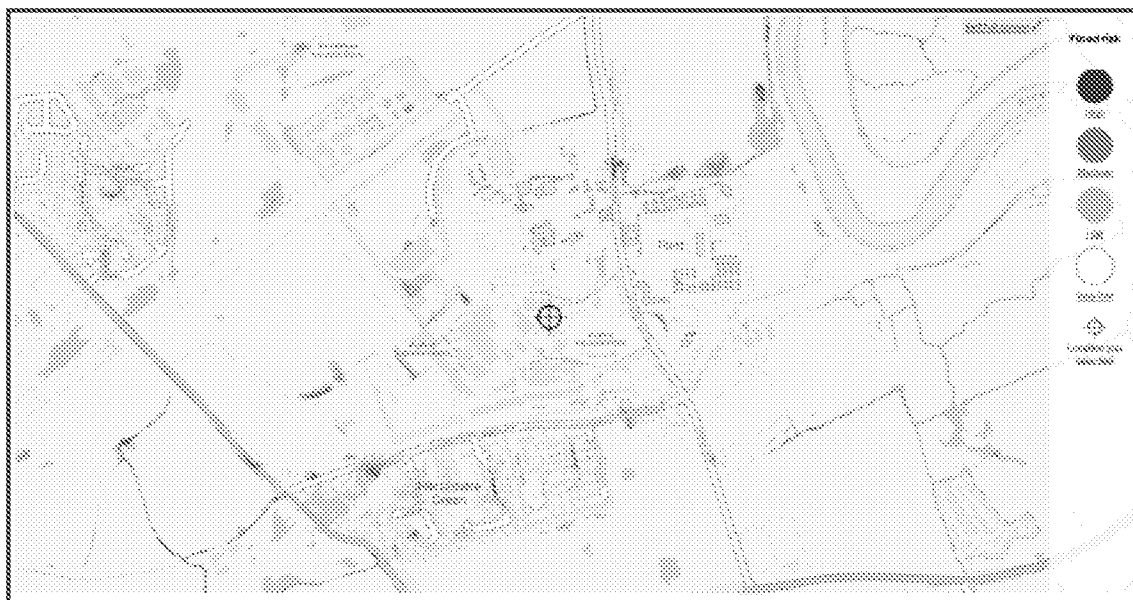


FIGURE 6
 Environment Agency - Flood risk from surface water



Ecology

A search of the government MAGIC database shows there are no statutory designations (Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SAC), Special Protection Areas (SPA) or Ramsar sites) within 2.5km of the site.

There are no National Nature Reserves or Local Nature Reserves in the vicinity of the site.

There is an area of Priority Habitat Inventory: Coastal and floodplain grazing marsh some 500 metres NE of the site, beyond the prison buildings on the east side of Ford Road being land adjacent to the River Arun.

Cultural Heritage

Scheduled Monuments

There is a Scheduled Monument (a single monument reference comprising of two areas of land combined area 2.9ha) which lie some 360 metres and 405 metres SE of the site (at their nearest point).

The Scheduled Monument (Ref 1005828) (shown in orange on Figure 7) comprises of medieval earthworks E and SE of St Mary's Church.

Both areas of land lie to the east of Ford Road.

Listed Buildings

There are a number of Listed Buildings close to the Industrial Estate and the site (shown on Figure 7),

Grade I	The Parish Church of St Mary (300 metres ESE of the site)
Grade II	The Vicarage (330 metres ESE of the site)
Grade II	Barn to the west of Nos 1 & 2 Church Farm Cottage, Horsemere Green Lane (260 metres SSE of the site)
Grade II	Church Farmhouse East and Church Farmhouse West (385 metres SE of the site)

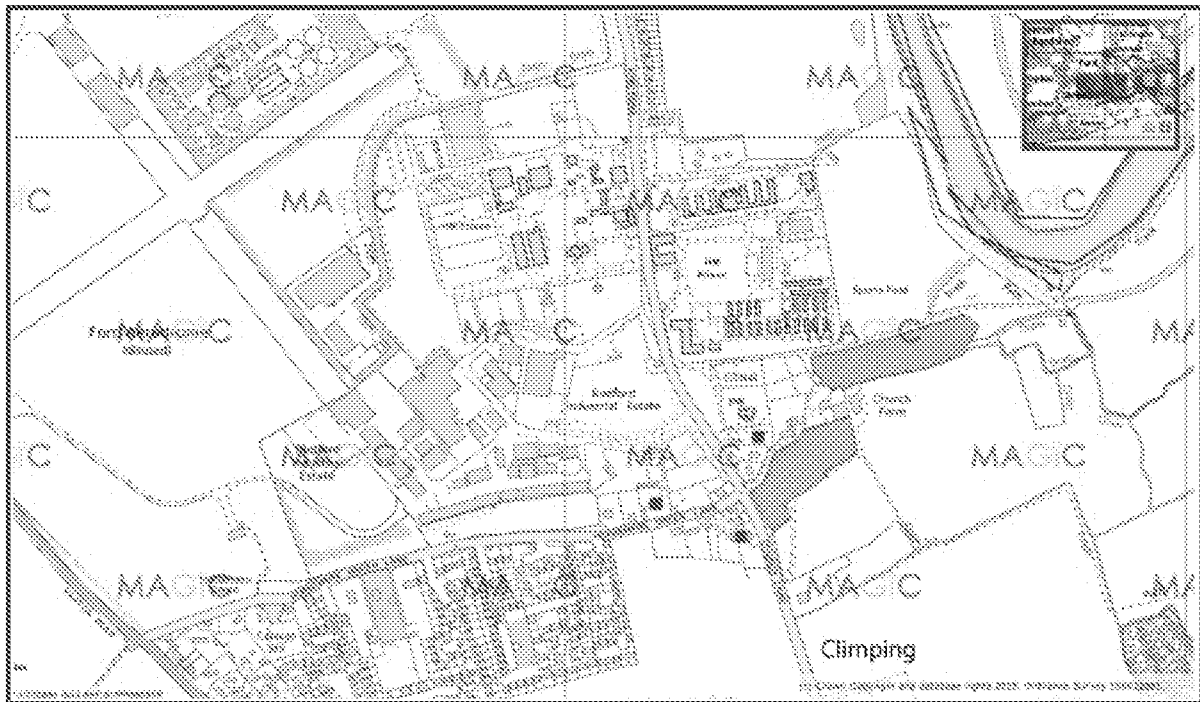
Public Rights of Way

Footpath No 175, which trends generally east to west and links Ford Road with Yapton Road and passes through the southern section of the Industrial Estate, is some 75 metres south of the site.

Air Quality

There are no designated Air Quality Management Areas (AQMA) within Arun District.

FIGURE 7
Scheduled Monuments and Listed Buildings



PLANNING

The National Planning Policy Framework

The National Planning Policy Framework (February 2019) ("NPPF", "the Framework") sets out the Government's planning policies for England and how these should be applied. The Framework is to be read "as a whole" and in conjunction with other documents detailing Government planning policy.

The NPPF requires that the purpose of the planning system is to contribute to the achievement of sustainable development. To achieve sustainable development the planning system has three, overarching objectives,

The economic objective, to ensure contribution towards building a strong, responsive and competitive economy by ensuring that land is available to support growth, innovation and improved productivity.

The social objective, to support strong, vibrant and healthy communities.

The environmental objective, which is (amongst other things) to ensure the protection and enhancement of the natural, built and historic environment (to include making effective use of land) and to use natural resources prudently, to minimise waste and pollution and to adapt to climate change by moving to a low-carbon economy.

At the heart of the NPPF is a presumption in favour of sustainable development. In respect of planning applications then this means approving development proposals that accord with an up-to-date development plan without delay or, in the absence of an up-to-date development plan, granting permission unless any adverse impacts significantly and demonstrably outweigh any benefits, or if specific policies in the NPPF indicate that development should be restricted.

Section 17 of the Framework: Facilitating the sustainable use of minerals amongst other things requires planning policy to safeguard "existing, planned and potential sites for...the manufacture of concrete and concrete products"².

The West Sussex Joint Minerals Local Plan

The West Sussex Joint Minerals Local Plan ("JMLP") was adopted in July 2018 and covers the period up to 2033. Whilst the JMLP has specific policies to deal with proposals for the development of mineral processing facilities (which includes concrete production) on a quarry site and as part of quarrying operations, where processing is independent of extraction and is not sited on, or adjacent to, a mineral extraction site then the development will be subject to the separate, District and Borough Council development management regime³.

² NPPF Paragraph 204 (e)

³ WSCC JMLP Paragraph 6.8.8

Arun District Local Plan

The Arun Local Plan ("the Local Plan") covers the period 2011-2031 for the area of Arun District (excluding the area covered by the South Downs National Park Authority) and was adopted in July 2018.

The purpose of the Local Plan is stated as being,

to encourage sustainable development and manage future growth whilst ensuring that change across the District is appropriate to meet local need. It will support the strategic provision of homes, employment and shops and will look to ensure that these are carefully co-ordinated with the services and facilities that communities rely on and which are essential to well-being and quality of life⁴

The overall purpose of the Local Plan to provide new homes and additional places of employment (both commercial and retail) will of necessity involve either "new build" or refurbishment which in turn will require concrete for use either directly in the construction process or in associated infrastructure works. This application will provide a concrete production facility in the heart of the District, close to areas identified elsewhere in the Local Plan for housing and employment.

Policy SD SP1a sets out the Council's strategic approach to achieving sustainable development in the Arun District by "securing economic, social and physical regeneration, and providing sufficient homes". The policy states that this will be achieved through, amongst other things,

- providing for the economic needs of the community by allocating around 75 hectares of employment land to support the regeneration of Bognor Regis, support job creation and provide for the needs of modern business
- delivering 20,000 homes
- encouraging the effective use of land which is not of high, environmental value

The provision of new homes and employment land (either new or refurbished/regenerated) will require concrete and, as previously indicated, the proposed batching plant at the Rudford Industrial Estate will be ideally located within the District to supply the demand associated with the Local Plan's policy.

Policy EMP SP1 provides greater detail as regards the Council's policy relating to economic growth in the District. The policy refers to the regeneration of the District's main town centres, the provision of new, high-quality employment land, the provision of employment sites within the proposed housing allocations and so on.

⁴ Arun Local Plan, Paragraph 2.2

Building a strong, competitive economy and encouraging local employment growth is identified as a "central theme" to the Local Plan. The Local Plan identifies a number of Strategic Employment Land Allocations in Bognor Regis, Littlehampton and Angmering. The delivery of these allocations will inevitably involve significant improvements to infrastructure, and specific measures are identified in the Local Plan, for example,

- Realignment of the A29
- Improved land drainage
- Provision of a link road between the A259 and the Bognor Regis Northern Relief Road
- Alleviation of known flood risks
- Access to the A280

Policy H SP1 provides the detail and phasing behind the strategic policy to deliver 20,000 new homes within the Plan Period (that is, up to 2031). A number of strategic housing sites are identified on the Policies Maps which accompany the Local Plan, including land adjacent to the Ford Industrial Estate which is identified as having potential for 1,500 new units, the third largest allocation in the policy.

The provision of new homes and employment land is often associated with other, significant infrastructure improvements (specifically referred to in the Local Plan), all of which will add to the overall demand for concrete.

Chapter 15 of the Local Plan provides policies and strategic objectives for transport. As part of the Local Plan's vision to strengthen the local economic base, new and improved transport routes will need to be delivered to improved access to identified employment land. A package of highway improvement schemes have been identified. A key strategic priority is the delivery of the A27 Arundel bypass. Infrastructure developments and improvements will require concrete and the facility proposed in this application will be well-placed to service some of this increased demand.

Policy T SP1 considers many aspects of transport and development. Of relevance to this application is the need to ensure "safe access to the highway network" and the promotion of "sustainable transport".

The application site is within the existing Rudford Industrial Estate which has established accesses from the Estate to the A259 via Ford Road/Church Lane. The Company is committed to improving vehicle emissions and the overall sustainability of the fleet.

Policy HER SP1 deals with protection of the historic environment generally through a policy of refusing proposals which would prejudice the conservation or enhancement of heritage assets, which includes listed buildings and their settings. As indicated in the section on Cultural Heritage above, there are a number of Listed Buildings close to the Industrial Estate and the application site (as shown on Figure 7). However, given the proximity of the existing Industrial Estate the proposed development will not lead to an increased impact on these buildings or their setting.

Policy W SP1 recognises the need to conserve and (where appropriate) enhance the quality of, the water environment. Development will be supported where, amongst other thing, it is "appropriately located, taking account of flood risk". As indicated above (refer to Figures 5 and 6) the application site (in common with the rest of the Industrial Estate) is in an area which the Environment Agency has assessed as having a less than "very low" risk of flooding from rivers or the sea, whilst the risk of flooding from surface water is negligible.

Chapter 21 of the Local Plan concerns the "Quality of the Environment". The policies in this chapter concern themselves with mitigating the impacts of noise (**Policy QE DM1**), light (**Policy QE DM2**) and air pollution (**Policy QE DM3**).

The proposed development is sited within the existing Rudford Industrial Estate and as such is an appropriate location for this type of activity. Noise associated with the proposed batching plant will not be a dominant feature at nearby noise-sensitive receptors. Noise generated from the plant will comply with appropriate national and local standards. Measures will be implemented to ensure noise impact is minimised, for example regularly maintaining access and surfaces within the site, maintaining all plant and machinery in accordance with manufacturer's recommendations, switching off plant and machinery when not in use and so on.

There will be no impact on areas identified within the Local Plan as being valued for their tranquillity.

Lighting at the site will either be as existing or will be comply with relevant British Standards and/or other guidance.

There are currently no designated Air Quality Management Areas within the District.

SUMMARY

This Planning Statement has been prepared to support an application to develop a concrete batching plant on land forming part of the Rudford Industrial Estate. The application site benefits from existing use rights (B2 (General Industrial) and B8 (Storage and Distribution)) and there will be no material change of use. The application is for approval for the operational development.

The proposed facility will be sited on the Company's freehold land and is required to meet the Company's business needs, enabling the supply of concrete to current and future development within the Arun District from a central location with established access to the Strategic Lorry Route.

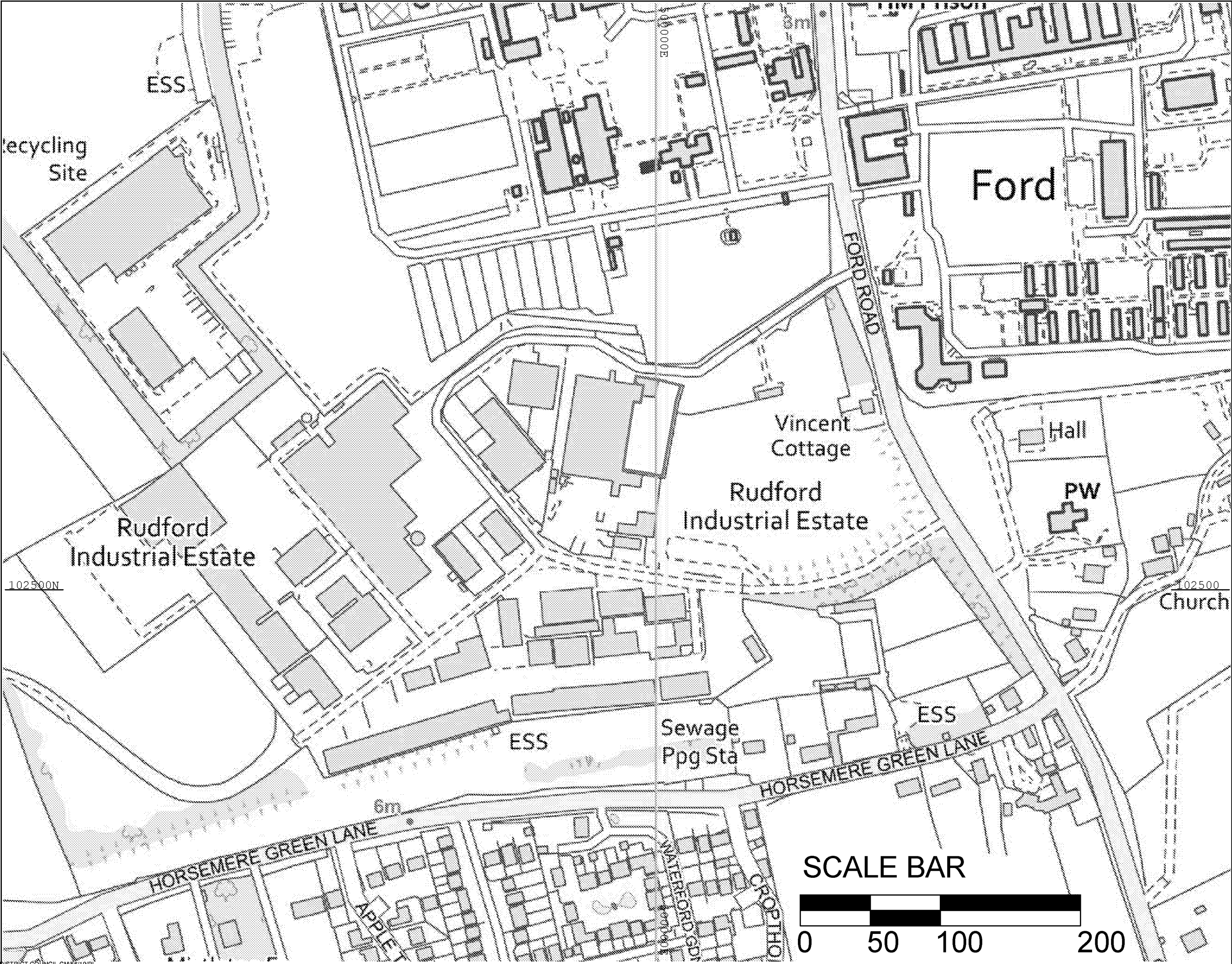
National planning policy requires planning authorities to make decisions which enable business investment and to allow businesses to expand so contributing towards building a strong and competitive economy⁵.

The site, land within an existing Industrial Estate, is acceptable in terms of the relevant policies within the adopted Arun Local Plan. The Local Plan was adopted in July 2018 and so is an "up to date development plan" in terms of national policy. This being the case then there is a presumption in favour of sustainable development which means that, as regards decision making, approval to the development should be made "without delay".

M G Metcalfe
LLB (Hons) DipArb FRICS
November 2019

⁵ National Planning Policy Framework (February 2019), Paragraph 80

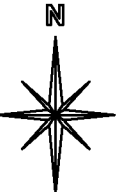
APPENDIX 1
APPLICATION DRAWINGS



REVISIONS		
Date	Description	By

Legend:

 Planning Application Area



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DUDMAN AGGREGATES

Job Title
RUDFORD INDUSTRIAL ESTATE

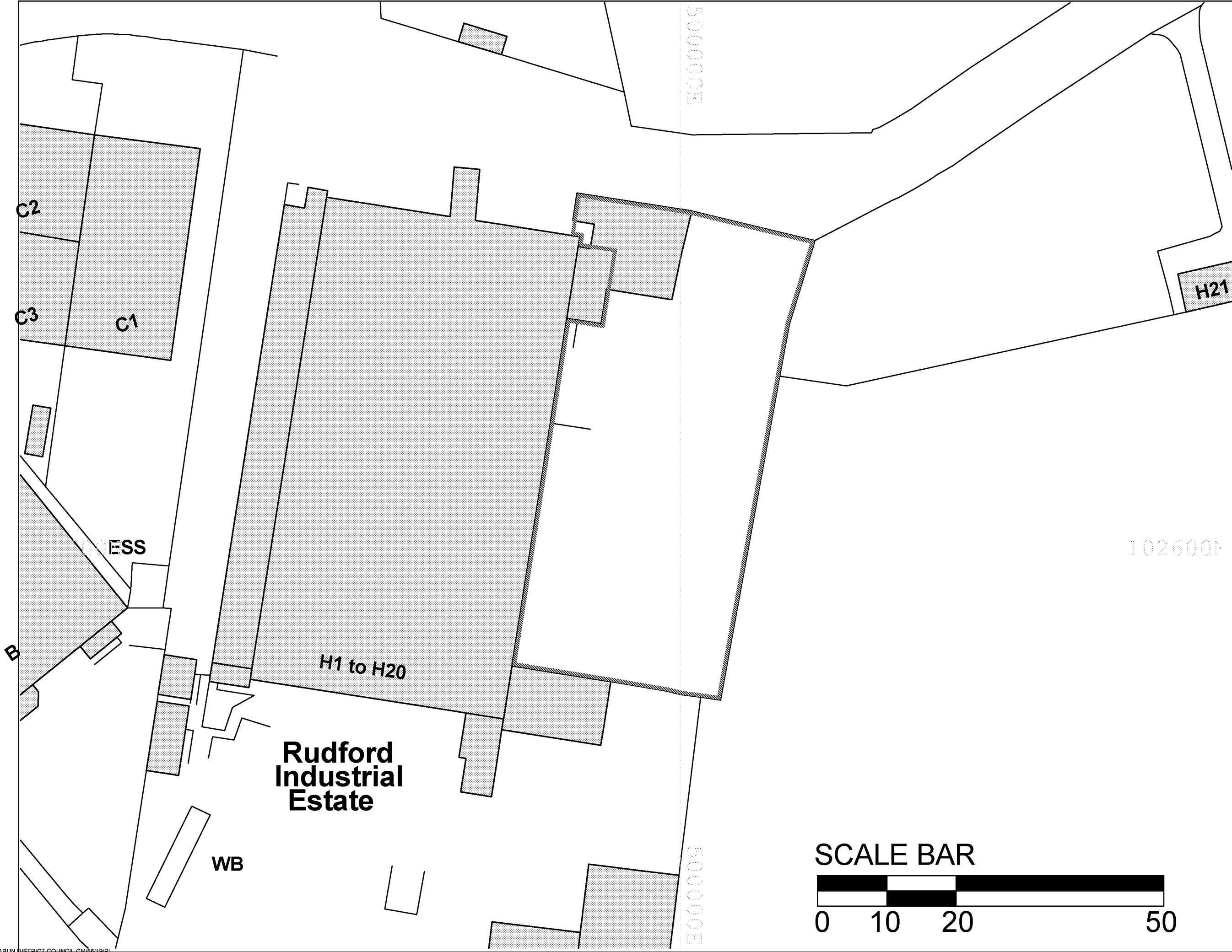
Project Title
Application for concrete batching plant

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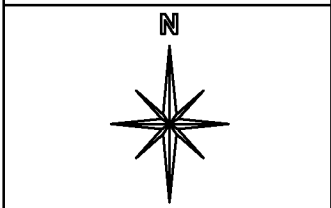
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Legend:

 Planning Application Area



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Job Title

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Project Title

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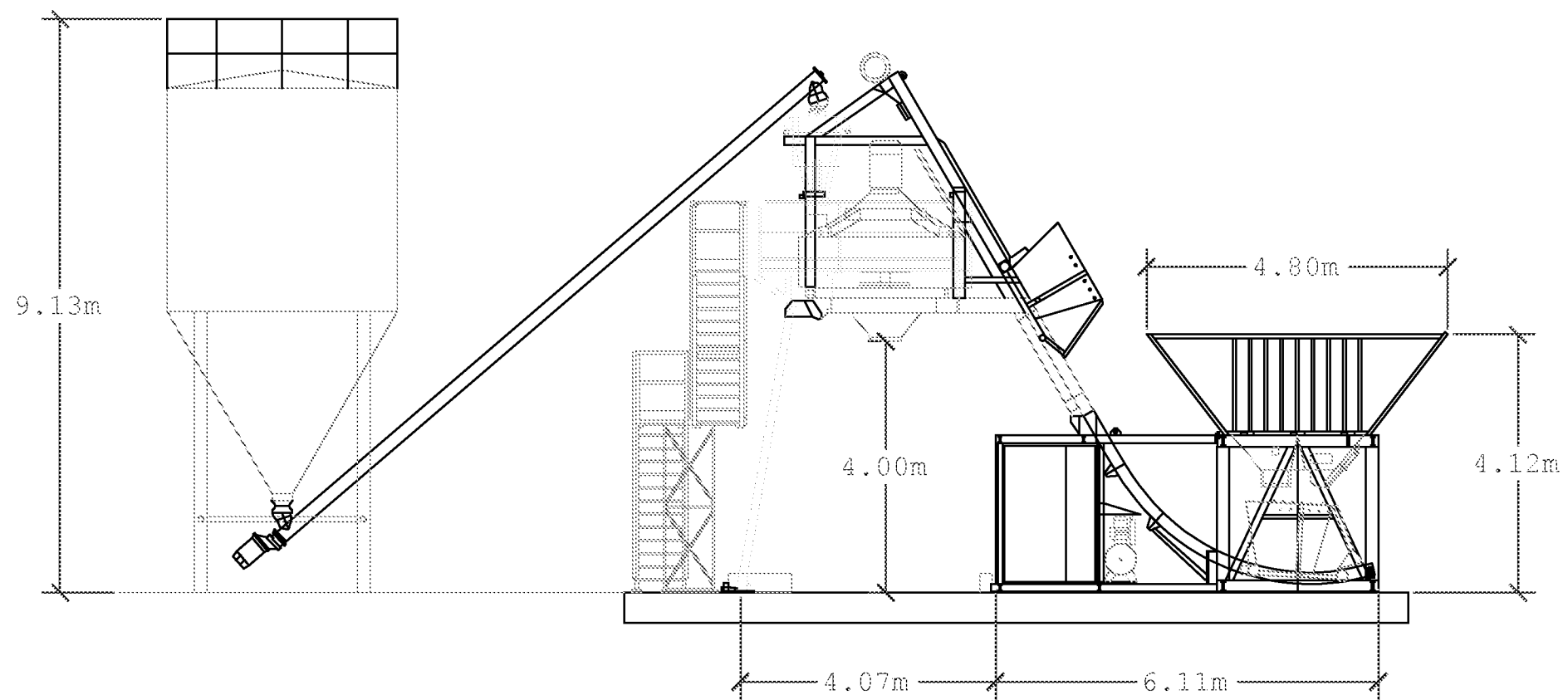
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SITE PLAN

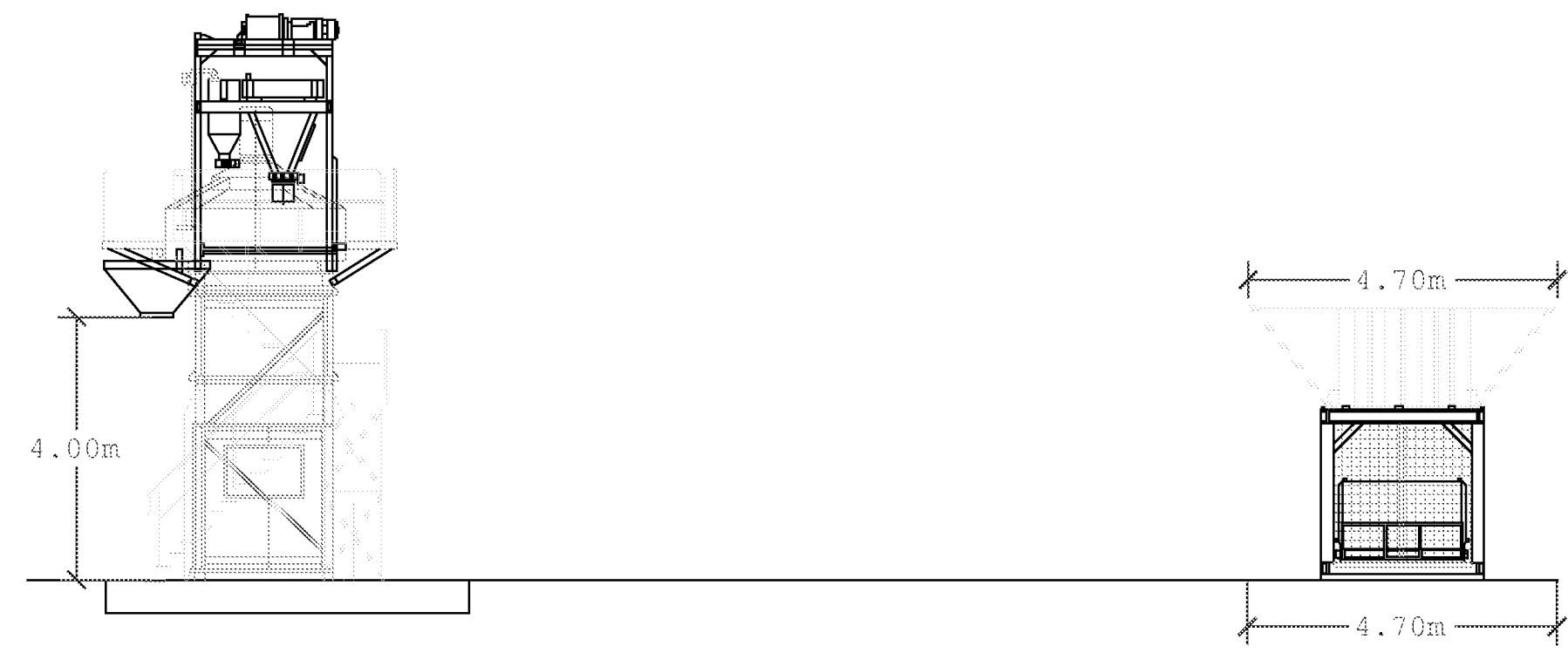
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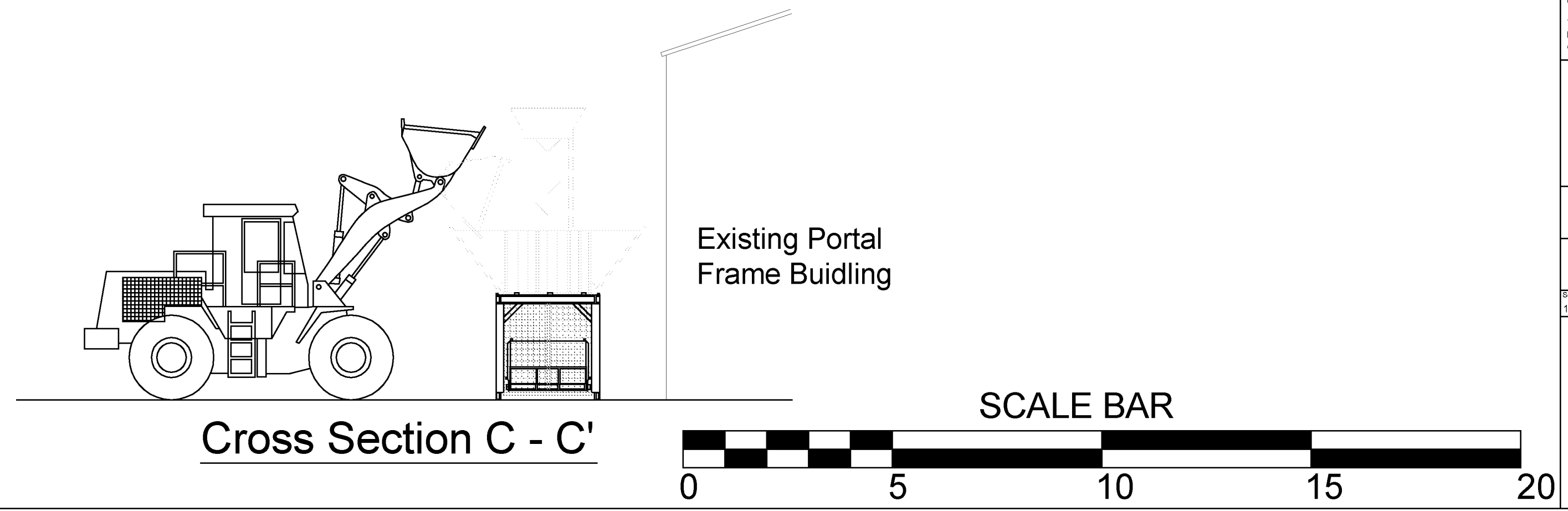
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Cross Section A - A'



Cross Section B - B'



Cross Section C - C'

REVISIONS

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N

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Project Title

Application for concrete batching plant

Scale

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Date

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Cross Section Plan

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