

# **Planning Design & Access Statement**

**Full Planning Application for the Change of Use of A1 Buildings &  
Yard, to B8 Use, with Elevational Alterations, Including Solar Panels  
and Changes to the Parking Layout**

**East Preston Depot, Station Road, East Preston, West Sussex,  
BN16 3AA**

Prepared for  
**Cube Storage**

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## **1. INTRODUCTION**

- 1.1. We are instructed by Cube Storage, to provide this Planning, Design & Access Statement in support of a proposed change of use from A1 (retail) to B8 (storage and distribution), with elevational alterations and changes to the parking layout, at East Preston Depot, Station Road, East Preston, West Sussex, BN16 3AA.
- 1.2. For the purposes of this submission, it should be noted that Class A1 has been subsumed into Class E. However, for the purposes of this submission, where A1 is mentioned, this relates to the new use class of E(a).
- 1.3. The application site is a historic commercial yard, with two existing buildings. Within this Statement, the larger of the buildings will be referred to as Building A, and the smaller building to the west, as Building B. Both these buildings and the yard have had various uses in the recent past. The most recent occupants of the yard were Parker Building Supplies, who vacated the depot in early 2025. They had first moved to the site in 2012 and occupied the buildings and yard for some 13 years. Despite being a Building Merchants business that undertakes bulk storage and distribution, the company was given an A1 retail use.
- 1.4. It is highly probable that this should have been a B8 use, which would have covered their typical business operation, and any A1 trade counter, would have been ancillary to and not the dominant use. This has been discussed with the Local Planning Authority (LPA), who likewise agree that the use should probably have been B8.
- 1.5. When looking at the approval notice for EP/51/12, this is further evidence by a condition imposed on the development which limits the use of the site to that of a builders merchants yard. However, that is not the consented use of the land and buildings, and so for Cube to move to the site, there is a need to secure a change of use. However, it is a strong material consideration in support of this application that the previous occupier ostensibly ran a B8 storage and distribution use.
- 1.6. Cube are seeking to use the building and yard as part of their self storage business. They are a medium sized company that operates in South East England. The buildings on site suits their needs and would require only limited minor alterations to the exterior and yard to facilitate their occupation. As part of the proposal, the applicant wishes to install internal two mezzanine floors in the larger of the site buildings, however, that would be an internal alteration only.
- 1.7. The application has been subject to informal pre-application discussions with the LPA and they have advised that any submission would need to be accompanied by a noise assessment, flood risk assessment (FRA) and highway assessment. The application is accordingly supplied with these documents, which confirm the use is appropriate for the site and location, and will not give rise to any unacceptable impacts on the local area.
- 1.8. This Planning, Design & Access Statement, should be read in conjunction with the following plans and documents:

- Existing & Proposed Site Layout & Roof Plan, Drawing No. 2025/PL01;
- Existing Floor Plans for Building A, Drawing No. 2025/PL02;
- Proposed Floor Plans for Building A, Drawing No. 2025/PL03;
- Existing Floor & Elevation Plans for Building B, Drawing No. 2025/PL04;
- Proposed Floor & Elevation Plans for Building B, Drawing No. 2025/PL05;
- Existing Elevation Plans for Building A, Drawing No. 2025/PL06;
- Proposed Elevation Plans for Building A, Drawing No. 2025/PL07;
- Site Location & Block Plan, Drawing No. 2025/PL078;
- Flood Risk Assessment;
- Transport Statement;
- Noise Assessment;
- Access Data from Uckfield Yard; and
- CIL Form.

- 1.9. The remainder of this Statement sets out the relevant planning policy and assesses the revised scheme in accordance with the requirements of the Development Plan and other material considerations including the National Planning Policy Framework (NPPF) and Supplementary Planning Guidance. It has been prepared having regard to the Town & Country Planning (Development Management Procedure) (England) (Amendment) Order 2018 and guidance contained within Planning Practice Guidance (PPG).

## **2. SITE & SURROUNDINGS**

- 2.1. The application site is located in the centre of East Preston and adjacent to Angmering train station. The land is flat and entirely developed. The yard contains two storage buildings and some areas of external storage. Building A, which is the larger of the two buildings is located to the eastern end of the site, and is of two storey construction with roughly an L-shaped footprint. Internally, there are two floors in part of the building. The buildings is in two sections, with a larger western side and a smaller eastern project that has its own separate access and loading area which is segregated from the remainder of the yard. It is however, internally connected to the remainder of the building.
- 2.2. Building B, is the smaller building and located at the far western end of the site, with a notably smaller footprint, but still of two storey construction. Both buildings have a typical commercial/ industrial character. They are clad in brick and metal sheet cladding, of varying colours.
- 2.3. There is a large main open yard space within the site, between the two buildings. This land was recently used for building material storage, lorry parking/turning space and as a car park. The site is accessed via a very wide vehicular opening, in the south boundary on to Station Road.

This then connects to the B2140, which is one of the main north/south routes through the village and wider conurbation. The whole of the site is contained by 3m tall security fencing. Both the main yard and smaller loading bay yard, have their own vehicular accesses.

- 2.4. Angmering station is an east-west railway line, that forms the northern boundary of the whole yard. The northern elevation of the larger building abuts the train platform. It is demarcated by fencing and some sporadic tree cover. The open yard area is then located adjacent to the station bridge and platform shelters.
- 2.5. The application site sits in a commercial/industrial area of the village, with a number of neighbouring businesses located to the east and south. There are various large commercial buildings and yards that are in varying uses. To the east and south of these yards are the back gardens of neighbouring residential properties. Likewise, to the west of the B2140, there are also residential uses mixed in with smaller commercial and shop uses.
- 2.6. To the south of the sites main entrance and the opposite side of Station Road, is a large four storey brick building. This is a corner plot and fronts on to Station road, the B2140 and Worthing Road to the south. This is a large block of flats known as Miliers Court. It is a modern development and comprised of sheltered flats for residents over 55 years old. The northern elevation of Miliers Court, overlooks the yard, but the building is contained by both hedging and some tree planting.
- 2.7. Overall the area has a mixed and varied character, that is neither defined by a particular building style, scale or land use.

### **3. PLANNING HISTORY**

- 3.1. Prior to 2012, the application site had been used as a B2 vehicle servicing depot. According to the application history for approval, EP/51/12, the use had manifested on site over numerous years and without planning approval. However, the use had become lawful through the passage of time and consequently there were no planning controls imposed on this industrial use.
- 3.2. An Officer Report from 2012, indicates that the occupiers were causing a number of amenity issues locally and had proven to be unpopular with local residents. It was therefore noted that one of the benefits of Parker moving to the site, was the removal of a non-conforming land use. A B2 use would not usually be compatible with a village centre location, where there are neighbouring residential uses.
- 3.3. Planning Application EP/51/12, was for change of use of from a vehicle servicing depot (B2 General Industry) to form a building supplies merchant (A1 Shops). It was approved on 26 July 2012 and subject to 6 conditions. This included limitations on times of use, as follows, “07.30 hours and 17.30 hours Monday to Friday (excluding bank holidays) and 08.00 hours and 12.30 hours Saturday.” The use was limited to that of a building merchants yard and PD rights were

removed to prevent the building from being extended, without consent being sought from the LPA.

- 3.4. As outlined in the introduction, this is was a rather odd approval, as the A1 use granted did not readily cover Parker's occupation of the site. Condition 3, which limited the use to a building merchants yard, also conflicted with the description of development. It is unclear from the Officer Report, why an A1 use was granted, however, that remains the consented use of the site.

## **4. PLANNING POLICY**

- 4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise. For the application site, the Development Plan (DP) comprises the Arun Local Plan (ALP) 2011-2031 (adopted July 2018) and the East Preston Neighbourhood Plan (EPNP) 2014-2029 (adopted 11 March 2015).
- 4.2. Material considerations include the National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG), adopted Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance (SPGs).
- 4.3. The LPA are working on a new Development Plan Document to replace the ALP. On 19 July 2023 a Full Council agreed to resume work on replacement document, following pauses in 2021 and 2022. An Issues and Options (Regulation 18) 'Direction of Travel Document' was published for consultation between March and May 2024.
- 4.4. The document identified the issues and challenges facing the district and the options that could help to address them. It should be noted that it did not identify any specific uses of land, potential development sites or draft policies as this will be done through a later stage of the Local Plan process. The responses received during the consultation were reported to Planning Policy Committee in September 2024. Since then, there has been no further update to the plans progress.

## **5. NATIONAL PLANNING POLICY FRAMEWORK (NPPF)**

- 5.1. The NPPF sets out the Government's planning policies for England and how these are expected to be applied. The revised version of the NPPF was released on 12 December 2024. For the purposes of this application, the following Paragraphs and Chapters are considered relevant to the proposal.
  - 1- 12, 39, 48, 49, 56 - 58, 85 - 87, 109 - 111, 113, 115 - 117, 124- 128 and Chapter 14.
- 5.2. Paragraph 8 sets out that achieving sustainable development means that the planning system has three overarching objectives (economic, social and environmental), which are interdependent and need to be pursued in mutually supportive ways.
- 5.3. Paragraph 10 states that so sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.

- 5.4. Paragraph 11 states that *“plans and decisions should apply a presumption in favour of sustainable development.”* for decision taking this means:
- *approving development proposals that accord with an up-to-date development plan without delay; or*
  - *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
  - *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
  - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”*
- 5.5. Paragraph 38 makes clear that Local Planning Authorities (LPAs) should approach decisions on proposed development in a positive and creative way, and should seek to approve applications for sustainable development where possible.
- 5.6. Paragraph 85 states, *“Planning policies and 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. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”*
- 5.7. Paragraph 86 states that, *“Planning policies should*
- *a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration;*
  - *b) set criteria, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
  - *c) pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics;*
  - *d) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*

- *e) be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.”*

5.8. Paragraph 87 states, *“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:*

- *a) clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections);*
- *b) storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation; and*
- *c) the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.”*

5.9. Paragraph 110 states that, *“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”*

5.10. Paragraph 116 states 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, following mitigation, would be severe, taking into account all reasonable future scenarios.”*

5.11. Paragraph 124 states, *“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. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.”*

5.12. Paragraph 125 states, *“Planning policies and decisions should:*

- *c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.”*

5.13. Paragraph 128 states that, *“Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.”*

## 6. ARUN LOCAL PLAN (ALP)

- 6.1. The ALP is the main Development Plan Document for the site and contains a range of applicable policy. The applicant has had regard to various chapters in the ALP, including both strategic objectives, policy requirements and other useful information.
- 6.2. Chapter 8 covers Employment and Enterprise issues. This confirms that, Arun's Local Plan strategic objective for Employment and Enterprise is to: *"Strengthen Arun's economic base and provide local job opportunities by increasing, diversifying and improving the quality of employment within the District through the provision of appropriate employment sites, quality affordable accommodation and the development of business support and partnerships."*
- 6.3. It is clear that economic growth and prosperity is a key matter for the plan to address. Paragraph 8.1.2 confirms that, *"Arun's approach is to drive employment and business growth by allocating sites, protecting land in business use, research, marketing and funding. This, combined with dedicated resources, simplified planning regimes and effective partnership work will aim to secure growth over the plan period."*
- 6.4. The plan is clearly committed to job creation and this is reflected in numerous positive statements throughout Chapter 8.
- 6.5. Policy EMP DM1 - Employment Land, states, *"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."*
- 6.6. *The Council will promote and support positive measures to upgrade existing employment areas through:*
- 6.7. *2. Protection of existing employment premises and sites Existing employment sites and premises will be protected where there remains a reasonable prospect of employment use. Excepting Permitted Development Rights or Local/Neighbourhood Development Orders, change of use from Business Class (B1-B8) or similar sui generis uses will not be permitted unless:*
  - *a) It is demonstrated that the site is no longer required and is unlikely to be re-used or re-developed for industrial/commercial purposes. This should include clear demonstration of marketing, viability appraisal and the suitability of the site to accommodate the proposed use - using a methodology to be agreed by the District Council at pre-application advice stage; or*
  - *b) The existing location poses insurmountable environmental harm or amenity which cannot be satisfactorily resolved.*
- 6.8. *3. Relocation and expansion of existing businesses.*
- 6.9. *The Council will positively encourage the relocation of existing firms wishing to expand within Arun District where this will improve their economic and environmental sustainability, improve the local environment for local residents and/or enhance the sustainable development potential of adjoining sites. The Council will support the regeneration and renewal of these sites and their surroundings for*

*housing and mixed-use development, if this assists the viability of the business relocation in Arun District."*

- 6.10. Policy SKILLS SP1 - Employment and Skills, states, *"The Council will encourage development proposals that support the following:*
- a) Raise skills levels and increase employability;*
  - b) Tackle skills shortages in existing and potential business sector clusters that are, or have the potential to be, strengths in the local economy;*
  - c) Promote skills on strategic housing and employment sites particularly with regard to construction skills;*
  - d) Address barriers to employment for economically inactive people; and*
  - e) Provide for the development of childcare facilities within or close proximity to employment sites."*
- 6.11. Policy D SP1 - Design, states that, *"All development proposals should seek to make efficient use of land but reflect the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. Development proposals should have been derived from: a thorough site analysis and context appraisal; adherence to objectives informing sustainable design (inclusivity, adaptability, security, attractiveness, usability, health and wellbeing, climate change mitigation and habitats); and the influence these objectives have on the form of the development."*
- 6.12. Chapter 15 confirms that one of Arun's Local Plan strategic objectives for Transport is to, *"Strengthen Arun's economic base and provide local job opportunities by increasing, diversifying and improving the quality of employment within the District through the provision of appropriate employment sites, better infrastructure, including road and rail access, quality affordable accommodation and the development of business support and partnerships."*
- 6.13. Policy QE SP1 - Quality of the environment, states that, *"The Council requires that all development contributes positively to the quality of the environment and will ensure that development does not have a significantly negative impact upon residential amenity, the natural environment or upon leisure and recreational activities enjoyed by residents and visitors to the District."*
- 6.14. *The location of existing industrial and commercial uses, including waste management uses, must be taken into consideration when assessing proposals for development sensitive to noise, light, odour and outputs to air. This is to ensure that land allocated for these uses are protected and to ensure that the amenity of new developments and facilities is safeguarded from the impacts of incompatible land uses."*
- 6.15. For a full appraisal of other relevant noise policies, please refer to the Noise Assessment provided by Acoustic South East.
- 6.16. For a full appraisal of relevant transport policies, please refer to the Transport Statement provided by iTransport. This includes references to Policies T SP1, T DM1, T SP3 and T DM2.

- 6.17. For a full appraisal of relevant flooding and water policies, please refer to the FRA produced by Aegaea.

## **7. EAST PRESTON NEIGHBOURHOOD PLAN (EPNP)**

- 7.1. The EPNP covers whole of the Parish of East Preston and includes policies which are broadly applicable to this submission. The following have been considered as part of the proposal.
- 7.2. Policy 10 - Local Shops and Employment. This states that, *“Development proposals to expand existing shops and businesses as well as to create new shops and businesses will be supported, provided they conform to other policies of the Neighbourhood Plan and of the development plan.”*

## **8. SUPPLEMENTARY GUIDANCE**

- 8.1. The following documents has been considered by the noise consultants as part of their assessment:
- Planning Noise Advice Document: Sussex, November 2023; and
  - Arun Parking Standards, 2020.

## **9. CUBE SELF STORAGE**

- 9.1. Cube is part of the Edward Baden Group, which was founded in 1998. The group originally began as a company specialising in relocations and then expanded into crate storage (EasyCrate, 2002), self-storage (Cube Self Storage, 2003), records management (2008), and co-working (2019). Cube now operates as an integrated storage-led business, offering storage, removals support, fine art logistics, records management and co-working spaces from one brand.
- 9.2. The company currently employ 60 people, of which 14 are located in Sussex. Across East Sussex they have 3 other storage facilities in Uckfield, Chiddingfold and Selmeaton. They then operate a further 10 facilities, which are located predominantly in South East Asia.
- 9.3. As of 2025, Cube UK is shifting to a storage-first growth strategy, aiming to expand into well-connected towns with strong residential catchments and a lack of modern storage facilities. The objective is to increase net lettable space, improve occupancy and grow their regional network across the South East of England.

## **10. PROPOSED DEVELOPMENT**

- 10.1. The application proposal mainly relates to a change of use of the two buildings and whole yard, from A1 to B8. Of the two buildings on site, there would be limited alterations to the exterior of the buildings. Building A is to have a large solar array across the main roof slope. The existing warehousing would be repainted in the company's livery, which is mid-blue. Elsewhere, it would include matters such as new signage for Cube (subject to a separate application), lighting on the buildings, security cameras and keypad boxes for entry to the building.
- 10.2. Internally, in Building A would have new mezzanine floors in the main part of the building. This would be added to create a three floor building and take the overall square meterage of the site,

from circa 1,400 sq.m to circa 2,200 sq.m. The main change is the addition of a mezzanine floor in Building A, at 1st and 2nd floor.

- 10.3. Building B would be retained as a single large open space, and there are no internal changes proposed. Externally, the building would be tied up, repainted and also to include signage (again, covered by another application).
- 10.4. There would be no changes made to either site access, including the existing arrangements on site for manoeuvring and parking. There is already enough parking spaces on site but this will be formalised to comply with County standards and will include new cycle parking. The application includes 13 parking spaces (including disabled and EV bays) and 8 cycle parking spaces and these are all shown on the proposed plans.
- 10.5. As part of the change of use, the applicants are seeking extended hours of use. This because the business relies on flexibility for customers being able to access the building at out-of-hour times. The applicant will therefore be seeking hours of use from, 06:00-22:00, 7 days a week. This is to cover some moderate early morning and late evening use for those seeking to access their storage bays.

## **11. MATERIAL PLANNING CONSIDERATIONS**

- 11.1. The following are matters which the applicant submits are material considerations in support of the proposal:
  - Need;
  - Policy & Guidance Considerations;
  - Planning History;
  - Economic Benefits;
  - Noise Issues;
  - Access & Parking Issues;
  - Flood Risk;
  - Hours of Use; and
  - Sustainable Development.

- 11.2. Each is now considered in turn.

## **12. NEED**

- 12.1. Cube have been actively looking for sites in Sussex where they can expand their self-storage business and have been considering various well connected towns and suburban locations. The East Preston Depot, would meet their needs for expansion as it is of a scale they are interested in, but also has a number of other very important factors. This includes the following:

- It is a self-contained 0.68 acre site, which helps to control access and maintain security and safety;
- The existing 1,400 sq.m of warehouse, offices, and yard areas, provides an ideal foundation for conversion to self-storage;
- It is immediately adjacent to Angmering station with excellent site visibility and connectivity;
- It has scope for a mezzanine expansion to grow lettable space; and
- It sits just south of the A259 with strong links to Worthing and Littlehampton, and has easy access on to the A27 and A29.

12.2. As an established commercial yard, located within a small and well managed commercial area, the site has many positives for the company. It should be deemed a significant material consideration in support of the proposal, that a successful local company, well established across Sussex, is looking to expand their business and have chosen the Arun District for this.

12.3. Both the Local Plan and NPPF indicate that economic considerations should carry significant/substantial weight in planning decisions. Relevant justifications for this will be expanded in later sections of this Statement, however, the company has a clear desire to expand. The existing yard is vacant and it is submitted that the LPA should be seeking to foster sustainable economic development by supporting submissions such as this.

### **13. POLICY & GUIDANCE CONSIDERATIONS**

13.1. All planning applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Material considerations of relevance here, include the historic use of the site, the commercial nature of the estate that the yard is located within and national guidance outlined in the NPPF.

13.2. Dealing with the Development Plan first, it is clear that economic growth and prosperity are key matters that the ALP is seeking to proactively address. The overarching economic strategic aim for the district is, *“to drive employment and business growth by allocating sites, protecting land in business use, research, marketing and funding. This, combined with dedicated resources, simplified planning regimes and effective partnership work will aim to secure growth over the plan period.”* This proposal will protect employment land and deliver much needed local economic growth, thus will assist in meeting this key LPA strategic aim.

13.3. The applicant submits that the scheme complies with all relevant policy within the ALP and EPNP, and is therefore acceptable. The application strongly accords with economic policies and objectives. The ALP looks to actively support and protect existing commercial land for continued employment uses and the proposal would meet those aims. Given that Parker Building Supplies left the site at short notice in early 2025, the yard has been vacant since. This means that it is currently providing no economic or employment benefits to the village or wider conurbation/district. Finding an active use for the building would strongly accord with Policy EMP DM1.

- 13.4. This is considered the most pertinent policy for the proposal and the application finds strong consistency with its requirements. In particular, Part 2 of the policy specifically seeks to protect B8 uses. Whilst the yard and building are A1 at present, it is the submission of the applicant, that the nature and use of the site has been as a B8 yard in recent years. It would also be a poor location for a large A1 use (please see the Transport Statement). By maintaining the current character and way the site has been used for the past 13 years, so the proposal would comply with EMP DM1.
- 13.5. It is also important to note that EPNP Policy 10, is positively worded and “*supports*” new economic uses. Further support is found in the ALP in meeting the aims of Policy SKILLS SP1, which will be considered in greater detail in the Economic Benefits section of this Statement.
- 13.6. Highway policy is considered below in the Access and Parking Issues section of the Statement. It is, however, important to note that the access arrangements will remain unaltered. There will be significant quantitative and qualitative improvements arising from this proposal with a significant reduction in overall anticipated movements. The amount of vehicles associated with a self storage use is significantly below that of a retail builders merchants yard.
- 13.7. There will be notable changes in terms of the type of vehicles accessing the site. Self-storage uses generate limited lorry and very limited artic movements, which typically cause more highway issues. Parker were supplied 6 days of the week by artic delivery lorries and much of the distribution left on large flatbed lorries. Most customers at self-storage sites, utilise cars and small vans which can easily access the site and manoeuvre within its confines, thus leaving in a forward gear. In this regard, the proposal would comply with strategic transport aims for economic uses.
- 13.8. As part of the proposal, it is clear that neighbouring amenity issues will be a relevant material consideration. Policy QE DM1, specifically relates to noise and will be discussed at length in the Noise Issues section of this Statement. However, there is also general amenity guidance contained in Policy QE SP1.
- 13.9. The policy seeks to ensure that planning applications do “*not have a significantly negative impact upon residential amenity... enjoyed by residents and visitors to the District.*” Here, it should be noted that Officers have indicated that the historic B2 use of the site was problematic due to the proximity of nearby residential uses. However, B2 uses are very different in nature to B8 uses. It is also material that Parker occupied the site for 13 years and ran the yard as a storage and distribution site, meaning the activity associated with this is an accepted part of the local environment and wider character of the area.
- 13.10. Clearly, the site is situated within a small commercial area and as such there must be a tolerance for a certain level of activity associated with such uses. B8 uses are typically very quiet and don’t cause amenity issues such as, vibrations, noise, odours or fumes. Storage uses, by their nature, are completely quiet and the only noise issues arising would be from cars accessing the site, which would not be out of keeping with the character of the area, and notably quieter than noises caused by the adjacent train station. The large reduction in vehicle movements associated with the proposal, would also benefit the local area in terms of a reduction in vehicular activity and associated noise. The proposed use does not require any forklifts on site, whereas Parker

maintained a number of forklifts that were needed for loading and unloading. There being no forklift use required as part of the proposal is a material benefit.

- 13.11. The applicant submits that the relevant policy seeks to prevent “*significant*” negative impacts, as there is a need to facilitate commercial changes on sites. Here, there will be no new negative impacts arising in comparison to the most recent site use, with matters in certain regards, such as noise and vehicle movements, notably improving. Cube are not a bulk storage company and there would be limited requirement for access by larger and noisier vehicles. Given this, there are actually some amenity improvements that would be forthcoming with their occupation and the proposal is fully compliant with QE DM1 and QE SP1.
- 13.12. Looking at national guidance, the applicant submits the proposal would strongly accord with key elements of the NPPF. The NPPF seeks to foster sustainable economic growth as a core aim. The proposal would be taking an existing commercial site, which is vacant and providing no economic benefits, and establishing a new business, with new employment opportunities. NPPF Paragraph 87, specially encourages LPA’s to support proposals for storage and distribution uses in sustainable locations. Being immediately adjacent to the train station, on the main road network and within the centre of the village, the location could not be more sustainable for the use proposed.
- 13.13. The proposal represents the re-use of previously developed land and existing buildings, which is strongly supported by the NPPF. Paragraph 85 confirms that “*significant weight*” should be placed on economic growth and productivity. Paragraph 124 confirms that planning decisions should support effective use of land.
- 13.14. Of crucial importance to this proposal is Paragraph 125 (c). This confirms that LPA’s must, “*give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused.*” As a development entirely contained on brownfield land, in a very sustainable location, substantial weight must be given to the proposed use and the scheme should be approved, unless there is “*substantial*” harm arising from the proposal. Substantial harm is an incredibly high bar. As outlined elsewhere, there is no harm arising from the proposal and therefore, it is clear that starting point for the this proposal is that the benefits attract substantial weight.
- 13.15. Given the above, and compliance with the Development Plan and national guidance, so it is clear that the proposal should be supported by Officers. This is a positive, economic-led, proposal that will make good use of an existing site and fit in, seamlessly, with the character of the local area. The proposal complies with all relevant local policy and is strongly supported by guidance in the NPPF.

## 14. PLANNING HISTORY

- 14.1. Here, the applicant wishes to briefly touch upon the planning history of the site over the past 25 years. Over that time the site has had a default B2 use, obtained through the passage of time and an A1 use, which was actually more akin to a B8 use.
- 14.2. Firstly, the planning history tells us as the site has been in economic use for at least a quarter of a century. This and the adjacent commercial yards are an established part of the district. Secondly, the more intensive commercial use of the land, namely B2, was causing problems locally and

therefore it is important to maintain the site in a commercial use that is commensurate with the mixed character of the area. Thirdly, and notwithstanding planning approval EP/51/12, the site has been in B8 style use for storage and distribution for around 13 years. This means the current proposal would match closely, how the site has operated in recent memory, albeit in a less intensive and busy manner.

- 14.3. Looking at EP/51/12, it is clear that the use described in the Officer Report is B8, not A1. It is entirely unclear why the LPA gave an A1 use to a B8 business, and then added a condition limiting the use of the site to a building merchants yard, which are typically B8 uses, although they can be *sui generis*. Regardless, they are never A1 Uses. There was nothing about Parker's occupation of the site that remotely matched the character of an A1 use. This therefore, strongly support the applicants view that Cube's occupation of the site, would be broadly analogous to that of Parker, albeit a less intensive form of storage and distribution use.
- 14.4. There is also a wider point about the maintenance of a Class E(a) retail use in this location. The site would represent a large retail use and if occupied by a typical A1 retailer, then the site could be considerably busier and used in a notably more intensive manner. By formally moving the site to a B8 use, the land would be in a use which matched the wider character of the local estate. It also matches how the site has operated in the recent past and so the LPA would have the opportunity to rectify a previous error and remove a potentially nonconforming land use. This is akin to the position they were in when the B2 use was removed from the land.
- 14.5. This is a wider benefit for the proposal and one that indicates the scheme would deliver other planning benefits.

## **15. ECONOMIC BENEFITS**

- 15.1. As outlined above, national guidance indicates that significant weight must be given to economic matters within the planning balance, and substantial weight, where previously developed land is repurposed within sustainable locations. As a more general point, the applicant submits that the LPA should be seeking to facilitate new economic uses (as advocated by the ALP) and the establishment of a new business in the district, especially where this will result in new job creation and inward investment into an area.
- 15.2. To assess the economic benefits of the proposal, the applicant has had full regard to Policy EMP DM1 - Employment Land. This is deemed to be the most critical policy within the ALP and one which the application proposal positively responds to.
- 15.3. The policy 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.*" As a starting point to the submission, the proposal strongly complies with this requirement.
- 15.4. The policy goes on to confirm that, "*the Council will promote and support positive measures to upgrade existing employment areas.*" There are then a series of policy considerations against which this scheme has been assessed. Not all are applicable to this submission, however, there are a number which are relevant.

- 15.5. This includes requirement 2, which seeks, *“Protection of existing employment premises and sites Existing employment sites..where there remains a reasonable prospect of employment use.”* The current proposal will protect this site as a commercial yard and by the fact the company wants to move to site, it confirms that there is a good prospect of maintaining it in an employment use.
- 15.6. At section 3, the policy seeks to foster the relocation and expansion of existing businesses. Section 3 goes on to state that the *“Council will positively encourage the relocation of existing firms wishing to expand within Arun District where this will improve their economic and environmental sustainability, improve the local environment for local residents and/or enhance the sustainable development potential of adjoining sites.”*
- 15.7. Cube are an existing business operating at three locations in Sussex, and looking to expand to their first site within the Arun District. This means that approval of the application would facilitate a relocation of their business to the local area and an expansion of their Sussex base. This will directly improve the local economy and result in improvements to the economic prospect for local residents.
- 15.8. The yard will generate new employment opportunities for the local area and this will include a range of job types. As they need staff on site every day, there is a need to find local employees who live near to the site and can access the yard easily. This will include both full and part time workers, especially those involved in site operations and sales. Existing staff will have opportunities for training and promotion within the expanded business.
- 15.9. The site also provides knock-on benefits to the local economy as the business needs to be facilitated by other employment. This includes local cleaners, maintenance teams, fit-out contractors and those that provide general site services and building repairs. All this complies with the skills based economic requirements of the ALP.
- 15.10. The company is therefore both an employment generator and creates inward investment for the local economy. At their other facilities, around 25% of their customers are small local businesses. This means that items stored on site will support the wider local economy. Typically, professional clients need to rent space for matters such as business relocations, storage of important/sensitive items and to provide them with additional capacity at times of growth. These are often small-scale companies that operate near to the storage facility and who are very important to the local economy. The yard would therefore be an important contributor to employment generating uses in the district. The Core Strategy makes it clear that securing the economic future of the area and creating new employment growth is a key spatial aim, which this proposal would strongly support.
- 15.11. If consent is granted, Cube would hope to fill around 80 sq.m of the storage facility, per month, once the business is established. This means that the company would grow sustainably into the site over a number of years as they establish themselves in the local area. They hope is to reach 80% occupancy as quickly as possible, which would be a typical occupancy rate for their other yards.
- 15.12. Cube estimate that around 75% of customers will be private individuals which aligns with the UK average for the self-storage sector. They have indicated that business users typically hire a number of units and private individuals between 1 and 3 units. Some customers stay for a very long time,

but occupation of a unit is usually between 12 and 18 months. This means there is anticipated churn of around 40-50% of occupied units per annum. All this demonstrates that Cube would be an active business and one that would be providing a very useful service within the local area.

- 15.13. There are also wider economic considerations which are relevant material considerations and would confirm the proposal is beneficial to the local area. This includes the recently updated Indices of Multiple Deprivation (IMD) 2025. This is a multiple measure of local deprivation, based on 7 different measures that are combined to provide an deprivation level for some 33,755 different areas in England. Each of these areas is known as a Lower Super Output Area (LSOA), which have a population of around 1,500 local residents.
- 15.14. East Preston sits in part of the developed south coast conurbation, which extends from the western edge of Worthing to Littlehampton. Within this part of the district, there are some LSOA's that exhibit very acute levels of deprivation. The ALP acknowledges some the challenges faced in the district by deprivation issues and the applicant wishes to explore some of these local issues and outline why economic development is key to addressing imbalances.
- 15.15. The LSOA that covers the application site is known as Arun 005D. This area is in the most deprived 50% of England. There is a second LSOA which immediately abuts the site and this is known as Arun 005E. This is almost in the most deprived 30% of England. What this means, is that the local area exhibits typically higher levels of deprivation issues than many other parts of the district and country.
- 15.16. When individual measures of income and economic deprivation are considered, this shows there are acute issues with both of these LSOA's. Of the overall IMD measure, economic and income matters weigh most heavily on the overall outcome. On the income measure, 005D is in the almost in the most deprived 40% of England and 005E the most deprived 30%. The employment deprivation issues are even more acute. 005E is in the most deprived 40% of the country and 005E, almost the most deprived 20%.
- 15.17. Clearly, there are both income and employment issues in the immediate local area, which need to be addressed. Whilst Cube would only be a single new business, they are seeking to locate in an area with above average to high levels of deprivation, which are particularly acute in employment deprivation. Anything which might generate new jobs and knock-on economic benefits in the area should be welcomed and form an important material consideration.
- 15.18. It is also material to note that just a short distance from the application site in Littlehampton, are 3 LSOA's that are in the most deprived 10% of the whole of England. This includes Arun 004A, 004B and 011C. This represents a significant local population that is suffering from incredibly high levels of deprivation. These are all within 2km of the application site and add weight to the economic arguments and benefits advanced in this Statement.
- 15.19. Overall, it is clear the proposal is very positive and should be welcomed by the LPA. There are clearly a host of economic benefits arising from the proposal and strong compliance with the ALP and NPPF.

## 16. NOISE ISSUES

- 16.1. This section of the Statement should be read in conjunction with the Noise Assessment undertaken by Acoustic South East (ASE).
- 16.2. When the applicant spoke informally with the LPA about the application proposal, it was confirmed that they should gather data about noise. This was to ensure that noise implications were explained within the submission and relevant data provided to confirm the impacts arising from the use. In particular, the LPA indicated they were keen to understand if there would be any unacceptable impacts on the nearby elderly resident flats, known as Millers Court.
- 16.3. To assess this, the applicant commissioned ASE to provide the relevant assessment. As the site is currently vacant, so there is no on site activity to measure. Whilst background noises could be captured, there was nothing to measure with the yard.
- 16.4. Given this, ASE advised that they would need to assess another of the Cube yards to see what sort of noise levels were generated by the use. In consultation with the company, it was agreed that the Uckfield yard was the most comparable. The Uckfield yard is located in a commercial area and within a town environment. This was broadly similar to the East Preston Depot. Whilst East Preston is technically a village, it is located in a highly developed conurbation that is more akin to a town, or large suburb. The Uckfield branch is notably larger than East Preston and has more storage units. However, the building and way the site is managed/operated is very similar.
- 16.5. ASE also advised that whilst there was no uses taking place on the site at the current time, typical background noise levels in the area should be gathered. The assessment of this was hampered as when ASE visited the site in late November 2025, to undertake the week long assessment, it transpired that the LPA had allowed a local contractor called, Landbuild, to use the Depot as contractors yard, whilst upgrade works were taking place on the local highway network. This meant that the noise assessment could not be undertaken as it wouldn't represent a typical background noise scenario with on road works taking place.
- 16.6. Landbuild were given the use of the yard until early 2026. However, the company confirmed that they would not be on site for 2 weeks over the Christmas and New Year period. Given this, the LPA advised that noise measuring should take place then but it would need to be extended from 1 to 2 weeks. Whilst the working week took place up to the 24th December and then restarted on the 27th, there would be some periods of time when it would be quieter. Given this, the longer data collection period would provide more detail.
- 16.7. The conclusions of the Noise Assessment are clear - the proposed use is acceptable and will have no unacceptable impact on nearby neighbours. They confirm that, *"based on the assessment findings and taking into account the relevant national and local planning policies, as well as the current subjective soundscape and the context of the site's recent history it is considered that Adverse Impact would not be experienced by the nearest NSRs. It is recommended that planning consent should not be refused on noise grounds."*
- 16.8. The assessment showed that at the closest point Building B was some 30m from Millers Court, and Building A, 38m. The noise assessment confirms that for Building A, for the final hour of the night-

time, there would be an  $Leq,15min = 37.4dBA$ , in the worst-case. For Building B, this would be  $Leq,15min = 39.4dBA$ , in the worst-case. This confirms the  $Leq,15min$  meets the nighttime noise level requirements for the adjacent building.

- 16.9. The noise readings confirm that, *“for Building A and Building B, it can be seen that the worst-case Rating Level from loading/unloading activity is “parity with existing background”. This is for the final hour of the night-time period (06:00hrs – 07:00hrs) and this is assessed because the proposed operating hours are from 06:00hrs – 22:00hrs, which spans the night-time-to-daytime switch over.”*
- 16.10. Considering the previous operator Parker, and their activities compared to those of Cube, ASE conclude the following. *“Whilst there will be loading and unloading activities happening in the outdoor yard, this will be considerably less than the activities occurring on this site previously when it operated as a large builders’ merchants when there would have been a significant amount of materials handling occurring with plant operating on site such as forklifts and their associated reversing warning sounds. Additionally, larger vehicles would have been frequently visiting, which are inherently higher in SPL than the cars which are more likely to be the vehicle to travel to and from site most regularly.”*
- 16.11. When this is combined with the reduction in overall vehicle movements noted by iTransport and the qualitative improvements (please see below), it is clear that the proposal will have no detrimental impact on neighbours and will be a notably more commodious use than the Parker occupation of the site. The proposed use is also further benefited by the surrounding area, which is relatively busy with road and rail traffic passing regularly. This provides a degree of “noise masking” to the activities which do occur on site.
- 16.12. Given this, the proposal complies with the relevant Development Plan policies, NPPF and SPD on Noise.

## **17. ACCESS & PARKING ISSUES**

- 17.1. This section of the Statement should be read in conjunction with the Transport Statement provided by iTransport. The assessment has considered the highway and access implications of the proposal, both in respect of the consented use of the site and that which occurred when Parker were the occupiers. The assessment outlines parking requirements for the site and also considers vehicular movements, based on the TRICS database.
- 17.2. The yard is served by an existing vehicular entrance. This is long established and has a very wide bellmouth. Clearly it has been designed for the safe access/egress by large vehicles. Given that Parker operated at the site for 13 years and utilised artic lorries for deliveries, so it is clear the access has been designed for this type of activity. For security purposes, Cube wish to maintain the existing steel gates, but these will be adapted so that customers can access the site, out of hours. The gates are well setback from the highway and there is plenty of space for a car to pull clear of the highway whilst waiting for the gates to open. Aside from electronic opening, no changes are required.
- 17.3. As noted by iTransport, self-storage users are typically private individuals or small company owners. The size of the storage units provided in the proposal (1.48 sq.m - 27.87 sq.m) are clearly

aimed at small-scale customers. As a result of this, nearly all vehicular movements will be made by car or van. There will be a small number of visits made by larger van or small lorry, but these are likely to be the exception.

- 17.4. In comparison to the use of the site by Parker, who relied on a mixture of artic, large lorries and flatbeds for the majority of their business, the occupation of the site by Cube would represent a qualitative improvement. Likewise, there will be no requirement for any forklift trucks to be on site, which are both noisy and add additional on site traffic. Likewise, large vehicles are noisier, slower and more likely to cause a highway blockage. Whilst there is no indication that Parker did not run a considerate and efficient operation from the site, it is clear that access by smaller and more nimble vehicles is preferable.
- 17.5. In terms of quantity of movement, there would be a significant reduction compared to the current consented uses. As outlined in the Transport Assessment, the TRICS database confirms that Cubes occupation would likely generate some 321 less two-way movements per week (92 movements v 421 movements). This is a significant reduction and the reality of self-storage sites is that they generate very low vehicular movements, as aside from when the units are filled or emptied, customers seldom visit the facility. Anecdotally, the applicant has said that at their other facilities, it is rare to get more than a few customers per hour visiting their sites.
- 17.6. In terms of the vehicle movements associated with the Parker occupation of the building, here it should be noted that this was based on an A1 Trade Counter Builders Merchant, which most closely matched the use. However, it should be noted that an open A1 use of the site would generate a vastly higher number of vehicle movements at the site. The TRICS data presented indicates this could be as high as 2,127 two-way movements per week. By comparison, it is clear the proposed use is substantially less intensive than other plausible uses of the building.
- 17.7. When Parker occupied the site, they did not have operating hours as long as Cube are seeking. However, they operated deliveries in and out, as well as having trade and other customer visiting the yard for a variety of reasons, including on site sales, ordering, product selection, returns, and complaints. By comparison, Cube's only customers are those with a storage unit. As mentioned above, once filled, customers return very infrequently, until they empty the unit(s).
- 17.8. As there would be 175 storage units on site, so there is the potential for a reasonable level of activity, but the reality is that most units are rarely accessed. To demonstrate this and provided with the application, is data taken from the applicant's Uckfield facility. For comparison, the Uckfield facility is about twice the size of the proposed facility at Angmering.
- 17.9. This shows fourth months worth of access data taken over the course of a year (one month per season). Whilst this has focussed on out-of hours access (pre 08:00 and post 18:30 hours), it shows an incredibly limited number of movements. For the four months presented, the data shows the following:
  - December 2024 - 19 separate entries;
  - April 2025 - 25 separate entries;
  - August 2025 - 23 separate entries; and

- October 2025 - 17 separate entries.

- 17.10. What this confirms is that there was not a single month where there was more than 1 out of hours movement per day, on a unit which is twice the size of the one proposed here. The busiest month was April 2025, but even then, there were 5 days with no visits. In October 2025, on just under half the days of the month, there were no visits. This shows very low levels of customer access, which strongly collates with the TRICS data presented in the Transport Statement.
- 17.11. What the evidence shows is that in comparison to the previous occupiers, there would be a notable reduction in the amount of vehicle movements to and from the site and these would typically be by smaller and more agile vehicles. Clearly, this represents an improvement for the local area and one that results in notable amenity improvements. The removal for the need of any forklift trucks operating in the yard is an added benefit. Accordingly, it is clear that the proposal is fully compliant with the Local Plan and NPPF.

## **18. FLOOD RISK**

- 18.1. This section of the Statement should be read in conjunction with the Flood Risk Assessment (FRA) provided by Ageaea. An FRA was required as the site is over 1ha in size and would therefore be classed as a major development. To ensure compliance with national validation requirements, a full FRA is provided in support of the scheme.
- 18.2. The objective of the FRA is to demonstrate that the proposal is acceptable in flood risk terms and has specifically considered the issues of:
- Fluvial/tidal flood risk;
  - Surface water flood risk; and
  - Risk of flooding from other sources.
- 18.3. The NPPF is clear that for many change of use application, these should not be subject to the sequential or exceptions tests, but that a development will still need to consider site specific flood risks. As the existing and proposed use are both low risk, so the FRA confirms that it is the lighter touch considerations that apply to this development.
- 18.4. As part of their assessment, Ageaea have considered both the NPPF and also Local Plan guidance, in particular, Policy W DM2. The report has also had full regard to the WSCC Prelim Flood Risk Assessments of 2011 & 2017, the ADC Strategic Flood Risk Assessment of 2016 and WSCC Local Flood Risk Management Strategy.
- 18.5. What these and the latest EA data confirms for the majority of flooding sources, is that there is no risk whatsoever. For pluvial flooding, the site is at low risk, even taking into account climate change. The likelihood of flood depths at the site, in an extreme pluvial event exceeding 0.2m, are very low.
- 18.6. As a result of the low risk use in a low risk flood area, so the FRA confirms that there are no mitigation measures required. As the development is not changing the extent of development on site, so there is no increased risk elsewhere. Ageaea advise that Cube should sign up for specific

local flood alerts and managers should monitor met office weather warnings. The applicant would be happy for the LPA to impose an informative on this matter.

- 18.7. Given the above, the proposal complies fully with the Development Plan and NPPF in respect of flood risk.

## **19. HOURS OF USE**

- 19.1. As part of the submission, the applicant is seeking hours of use for the facility that would exceed typical working hours of 08:00 - 18:30 (Mon-Fri), which many retail and commercial businesses operate. The nature of self-storage, is that the business needs to operate on longer hours, so that customers can access their storage units earlier in the morning and later in the evening. This level of flexibility is expected by customers and it is important to establish to ensure the business is a success. The application is submitted on the basis operating hours that are between 06:00 - 22:00 (Mon-Sun).
- 19.2. The hours of operation are needed for flexibility, as there can be times when customers need to obtain something from a unit, out of working hours. Cube have explained that one of the more common reasons for this, can be where a client is moving home and has many important items stored in their unit. Sometimes this can be something such as an important document or passport, which might be needed to complete the house sale and sometimes have to be obtained urgently or at very short notice. Some customers need the flexibility because of their working hours.
- 19.3. The out of hours system works whereby the customer has a code to get through the frontage gates, and then another code to access the building. This means that the accessing arrangement is very low impact and very unlikely to cause much noise or any amenity issues. As discussed above, the applicant has provided 4 months worth of 'out-of-hours' access data from their larger Uckfield branch. Over the course of a year, one month was selected for each season to show a good spread of data. Each month was then reviewed to assess the amount of times units were accessed between 06:00 - 08:00 and 18:30 - 22:00.
- 19.4. Without repeating that information, the level of out of hours access was very low. The 4 months selected comprised a total of 123 days. During this time, there were 84 out of hours visits, which equates to visits on 68% of days. This means that from the sample presented, there is well under 1 out of hours visit per day.
- 19.5. The applicant submits that the only amenity issue arising for this, might be very minor car noises, such as engines or car doors closing. However, this would be no different from existing car noises from vehicles on the local roads, or parking on side streets. Furthermore, the site is immediately next to Angmering Train Station which operates until almost midnight, most days of the week. The 'noise masking' created by this would far exceed anything from the application site, which is in a suburban village location and would be insignificant.
- 19.6. It is common throughout the industry for self-storage businesses to operate in this manner. Cube's other units have similar opening hours and it is notable that the LPA have recently granted planning approval for a self-storage company in Bognor Regis, on very similar opening hours. The application, reference, BR/65/25/PL, was approved on 9 July 2025. The application site is located

in a road of small scale retail units, many of which include first floor flats. Despite the partially residential setting, there were no objections raised by Officers.

- 19.7. The approval included the following condition:
- 19.8. *"The 'Self-Storage' use hereby permitted shall not be operated at any time other than between the hours of 08:00 and 22:00 and at no other time.*
- 19.9. *Reason: To safeguard the amenities of nearby residents in accordance with Arun Local Plan policies D DM1 and QE SP1."*
- 19.10. The applicant is seeking a broadly similar condition be imposed on their scheme, but with the increased flexibility from 06:00 in the morning. It should be noted that the existing use is consented from 07:30. Given this, the applicant is effectively seeking an additional 1:30 hours of use in the morning.
- 19.11. Here, is it worth noting that the application site is within an existing commercial estate, that is well away from neighbours and it has been demonstrated by ASE, that the use will result in no detrimental noise impacts. The use is also markedly different from the consented use. The application site is unlike the Bognor one, which was located in a notably more mixed and town centre street area. This application site, is set in an area of commercial warehouses and next to the train station.
- 19.12. It is material to note that the first train to leave Angmering Station in the morning, between 05:12 and 05:14. This is notably earlier than the start time that Cube are seeking. The train station means there is an element of early morning noise and activity that already exists in the immediate vicinity of the site. When this is combined with the very low levels of early morning access that would occur, any impacts arising from this would be negligible.
- 19.13. For officers information, the 4 months of data provided from Cube's Uckfield branch, showed that of the 84 out of hours access visits, only 24 of these occurred between 06:00 and 08:00. That means during the timeframe assessed, early morning access was less than 1 trip every 5 days. Prorated over the year, this would mean less than 70 early morning visits per annum.
- 19.14. Given the local environs and character, this is considered to be entirely acceptable and therefore acceptable. It should also be noted that there is an economic dimension to this as well, with the opening times assisting and sustaining the applicant's chances of making the site a successful part of their business.
- 19.15. Finally, it is worth flagging the submissions made above regarding noise and the improvements deriving at the site in respect of vehicle and on site noises. Given that Cube are a very quiet operator, this adds weight to the acceptability of the extended opening hours.

## **20. SUSTAINABLE DEVELOPMENT**

- 20.1. The NPPF sets out a presumption in favour of sustainable development. Having regard to the guidance of Paragraph 7, this confirms the purpose of the planning system is to contribute to the achievement of sustainable development.

- 20.2. Paragraph 8 confirms 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 (so that opportunities can be taken to secure net gains across each of the different objectives). The NPPF's definition of sustainable development has been adopted into the LP and forms part of the Development Plan (SD SP1).
- 20.3. These objectives and the schemes compliance with them are summarised as:
- 20.4. **Economic Objective:** The proposal would deliver significant and real world economic benefits. This includes, the re-use of redundant commercial land. Expansion of an existing Sussex based business into the Arun district. The creation of new jobs, inward investment and knock-on benefits to the wider economy. Economic improvement for the local area and population, which in parts has higher levels of deprivation. The proposal finds very strong compliance with the requirements of the ALP and NPPF.
- 20.5. **Social Objective:** The NPPF makes it clear that sustainable development involves seeking positive improvements in peoples quality of life. The proposal would improve the choice of job available in the local are and would deliver a range of job opportunities from low skilled, upwards. The current site is empty and somewhat blights the local area. Reintroducing a business to the site, will benefit the wider local community and appearance of the area.
- 20.6. **Environmental Objective:** The site is previously developed land and entirely classed as brownfield. Given this, there are ecological issues at the site. The proposal has fully considered the issue of flooding, and there are no risks arising form the change of use. In terms of noise and activity, the use of the site will be notably less intensive that the current A1 use. B8 uses, by their nature are quite and entirely appropriate for commercial areas that the application site sits within.
- 20.7. The proposal accordingly delivers against the three aims of sustainable development. It is considered that the proposal complies with all relevant planning policies at a national level and local level. It is submitted that if there are no material considerations that outweigh this compliance, planning permission should be granted.