

planning
transport
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The demolition of a Silo and the erection of a B1(a) Office Building, 6no. parking spaces for office workers and erection of boundary fencing at the Former McIntyre Nursery, Ferring, West Sussex, BN12 6PG.

November 2019 JAC/JH/14120



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1 Introduction

1.1 Purpose of statement

- 1.1.1 This statement has been prepared by DHA Planning on behalf of the applicant Mr. J. Sacco for:

'The demolition of a Silo and the erection of a B1(a) Office Building, 6no. parking spaces for office workers and erection of boundary fencing at the Former McIntyre Nursery, Ferring'.

- 1.1.2 This statement provides an overview of the site, its context and the relevant planning history, as well as a review of the applicable Development Plan, the National Planning Policy Framework and other relevant guidance.
- 1.1.3 The report concludes that that the proposed Office Building is sustainably located, appropriate in planning terms and accordingly requests that planning permission be granted.

1.2 Application documents

- 1.2.1 This statement should be read in conjunction with a number of plans and documents, which are submitted as part of this application. This includes the following:

Documents	Author
Application form (submitted online)	DHA Planning
Covering Letter	DHA Planning
Retrospective Planning Statement	DHA Planning
Proposed Scheme 4 – 3D View	Warwick Lane Developments LTD
Proposed Scheme 4 – 3D View 1	Warwick Lane Developments LTD
WLD/0063/19/01 Existing Plans & Elevations	Warwick Lane Developments LTD
WLD/0063/19/02 Rev B Proposed Plans & Elevations	Warwick Lane Developments LTD
WLD-0063/19/05 Rev A Square Meterage	Warwick Lane Developments LTD

2 Site and Surroundings

2.1 General Location

- 2.1.1 The site is located to the north of the Littlehampton Road (A259) along an unnamed road.
- 2.1.2 To the east of the site lies an open sports field, including a football pitch. To the west and north is the Highdown Vineyard and associated buildings, as well as the industrial estate at Hangleton.



Figure 1: Site Location (Courtesy of Google Earth)

- 2.1.3 The approximate 55m² site is part of the former McIntyre Nursery, situated away from residential property. Since the expiry of the nursery permission, the site has been used for commercial purposes including a large fencing contractor yard and other commercial companies.
- 2.1.4 Within the vicinity of the site there are several local services and amenities, including but not limited to: The Highdown Bar and Restaurant, Highdown Gardens, Highdown Vineyard, Asda, a petrol station, The Henty arms, Lansdowne Nursery and The Chip Shop.
- 2.1.5 There is a bus stop located some 70 metres from the site, which offers the route 9 service between Arundel and Shoreham, providing hourly services during weekdays and weekends. 680 metres away another bus stop offers the 700 coast liner service, providing access to Littlehampton, Bognor Regis, Chichester, Havant and Portsmouth.
- 2.1.6 Goring-by-Sea railway station is within 1.25km of the site and can be accessed via well-lit pedestrian footpaths in approximately 15 minutes by foot. The station

offers railway links to London Victoria, Littlehampton, Brighton, Southampton and Portsmouth as well as other surrounding areas.

2.2 Application Site

- 2.2.1 The Silo building in question is situated to the north eastern part of the applicants site, adjacent to the access route.
- 2.2.2 The site comprises of the aforementioned Silo, a mixture of former nursery buildings which are now used for commercial purposes, as well as commercial storage buildings and other structures.



Figure 2: Site Location (Courtesy of Google Earth)

- 2.2.3 The Silo is surplus to requirements, and as such the applicant is submitting planning permission for its demolition and the subsequent erection of an Office Building. The site has not been used for agriculture for sometimes and not withstanding a recent permission to convert it to office it is considered preferable to undertake a new build development.
- 2.2.4 It is noted that the site does not have any statutory designations according to Arun District Council's interactive map.

2.3 Planning History

- 2.3.1 The applicant had previously applied for the Change of Use and conversion of the existing grain Silo to B1a Office space with associated parking, which was permitted under Application Ref: FG/56/18/PL on the 15th November 2018.
- 2.3.2 However, due to the financial implications of renovating the Silo as well as its poor energy efficiency if converted to a B1(a) Office Space, the applicant no longer wishes to execute Planning Permission FG/56/18/PL.

2.3.3 According to Arun District Council's Planning History database, the site has been the subject of the other following Planning Applications:

- FG/93/93 Granted with conditions 18th October 1993 – 2no. multi-span greenhouses clad in polythene.
- FG/124/94 Granted with conditions 3rd January 1995 – 2 small polytunnels.
- FG/1/97 Granted with conditions 8th January 1997 – Horticultural pack house.
- FG/80/00 Refused 10th October 2000 – Proposed agricultural chalet bungalow & garage (Departure from development plan).
- FG/129/00 Refused 11th December 2000 – Demolish existing offices and provide replacement offices for McIntyres Nursery.
- FG/121/01/BR Granted with conditions 7th November 2001 – Proposed agricultural chalet bungalow & garage.
- FG/119/01/BR Rejected 7th November 2001 – Demolish existing offices and provide replacement offices for McIntyres Nursery.
- FG/5/02/BR Granted with conditions 9th January 2002 – Demolish existing offices and provide replacement offices for McIntyres Nursery.
- FG/29/02 Withdrawn 11th March 2002 – Proposed traditional smock windmill with visitor centre/shop and eight car parking spaces.
- FG/136/05/IN Accepted 18th October 2005 – Initial notice for proposed chalet bungalow.
- FG/98/06/ Refused 18th July 2006 – Continuance of use without compliance with condition no. 2 imposed on Planning Permission FG/80/00 relating to occupation restriction.
- FG/116/06/IN Accepted 24th August 2007 – new office building.
- FG/173/07/ Refused 17th October 2007 – Provision of 3m high double timber acoustic fence situated a minimum of 14.5m from the highway (A259).
- FG/98/08 Refused 8th July 2008 – Change of use of polytunnels for storage of motor vehicles.
- FG/76/09 Refused 22nd June 2009 – Continuation of use of polytunnels for storage of motor vehicles.
- FG/59/10 Approved 24th April 2010 – Change of use from former agricultural nursery to B8 storage and wholesale supply of fencing and associated materials.
- FG/14/11 Approve 11th February 2011 – Replacement of existing manual gate with new green heavy duty galvanised steel gate.
- FG/42/12/ Refused 19th April 2012 – Use of polytunnels for storage.

- FG/101/12/ Refused 27th July 2012 – Application for removal of condition 2 following a grant of planning permission FG/80/00 for the occupation of the dwelling.
- FG/25/14/CLP Approved 28th March 2014 – Application for a Certificate of Lawfulness for a proposed use as a unrestricted residential site.
- FG/108/14/PL Refused 28th July 2014 – Proposed new storage facilities for existing permitted scaffold yard & firewood yard to replace structures to be demolished.
- FG/110/14/PL Refused 3rd September 2014 – 2no. carports and 1no. gazebo.
- FG/149/14/PL Approved 10th October 2014 – New storage facility for existing scaffold yard and firewood yard. Replace structures to be demolished.
- FG/175/14/PL Withdrawn 24th December 2014 – Retention of existing external lighting.
- FG/14/15/DPC Approved 5th February 2015 – Application for approval of matters reserved by condition imposed under ref: FG/149/14/PL relating to Condition no. 3.
- FG/26/15/OUT Appealed 10th February 2015 – Outline application with all matters reserved for the erection of 1 no. four bedroom dwelling.
- FG/36/15/PL Approval 9th March 2015 – Retention of existing external lighting.
- FG/84/15/PL Appealed 25th June 2015 – Temporary stationing of 1no. residential caravan for 3 years.
- FG/13/16/PL Refused 11th February 2016 – camping facilities comprising of 23no. eco yurts with ancillary building to contain reception and wash amenities with access and parking.
- FG/190/16/PL Approved 2nd December 2016 – Application for removal of condition 3 following a grant of planning permission FG/129/00 relating to the restrictive use of the ancillary office accommodation to the needs of agriculture, horticulture forestry and for no other purpose.
- FG/8/17/PL Appealed 13th January 2017 – Camping facilities comprising 23 'eco' yurts with ancillary building to contain reception and wash amenities with access and parking.

3 Proposed Development

3.1 Introduction

- 3.1.1 The scale, form and design of the development has been informed by the existing 'on-site' structure to deliver a scheme in keeping with the character of the surrounding area. The scheme aims to provide a much-needed modern Office Building whilst respecting the former use of the site.

3.2 Overview

- 3.2.1 The application seeks permission for:

'The demolition of a Silo and the erection of a B1(a) Office Building, 6no. parking spaces for office workers and erection of boundary fencing at the Former McIntyre Nursery, Ferring'.

3.3 Description of the proposal

- 3.3.1 This planning application proposes the demolition and of an existing former grain Silo and the erection of a B1(a) office building.
- 3.3.2 The ground floor of the office will comprise of office area, a lobby, a WC and a kitchen, the first-floor office area and a WC and the second-floor office area with access to an external green roof patio. A weathervane is situated on top of the proposed building following feedback received from Arun District Council.

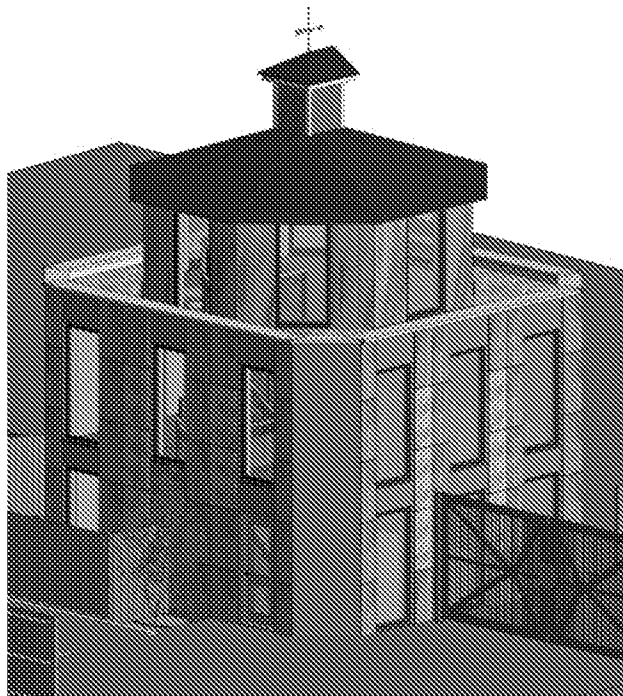


Figure 3: Proposed 3D scheme of the Office (Courtesy of Warwick Lane Developments)

- 3.3.3 It is proposed that the elevations of the building will be comprised of corrugated sheet metal and grey render with a zinc roof.

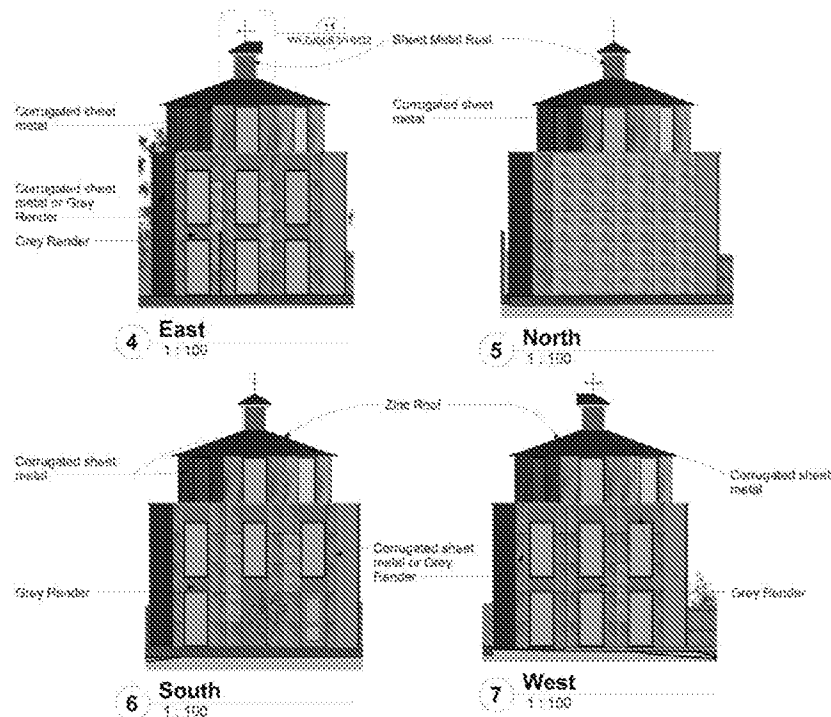


Figure 4: Elevation and Materials. Not to scale (Courtesy of Warwick Lane Developments)

3.4 Energy Efficiency

- 3.4.1 As aforementioned, the site has previous Planning Permission ref: FG/56/18/PL for the conversion of the existing silo into a B1(a) Office Space.
- 3.4.2 However, the applicant, who is committed to making an energy efficient B1(a) Office Building, concluded that after undertaking detailed research that converting a silo to an energy efficient Office Building was unrealistic and financially unviable.
- 3.4.3 The applicant, wanting to make the proposed Building as energy efficient as possible, therefore seeks to demolish the silo and build a sensitively designed B1(a) Office Building.
- 3.4.4 Furthermore, the applicant is seeking the installation of 1 electric car charging point on the site to accommodate and promote the use of electric vehicles.

4 Planning Policy Framework

4.1 Overview

- 4.1.1 Under the provisions of Section 38 (6) of the Planning and Compulsory Purchase Act 2004, applications for planning permission are required to be determined in accordance with the provisions of the Development Plan in force unless material considerations indicate otherwise.
- 4.1.2 This section sets out the relevant policies of the statutory development plan and refers to any other material considerations that should be taken into account in determining this application.
- 4.1.3 In this case, the following documents are relevant to the application:
- Adopted Arun Local Plan 2011-2031 (July 2018);
 - Ferring Parish Neighbourhood Plan 2014-2029 (January 2015);
 - Arun District Council Parking Standards (October 2000);
 - South Downs Local Plan 2014-2033 (July 2019) and
 - National Planning Policy Framework (February 2019)

4.2 Adopted Arun Local Plan 2011-2031

4.2.1 Policy SD SP1: Sustainable Development (edited)

'When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work pro-actively with applicants to jointly find solutions which mean that proposals can be approved wherever possible and to secure development that will contribute to the social, economic and environmental conditions south of the National Park through to the coast and throughout its settlements'.

4.2.2 Policy SD SP1a: Strategic Approach (edited)

'To maintain the District's unique character as a coastal location set against the South Downs whilst ensuring that the needs of the community are met through sustainable growth and the provision of suitable services, the spatial strategy for Arun District to 2031 is to;

g. encourage the effective use of previously developed land in accordance with the strategy, provided that it is not of high environmental value'.

4.2.3 Policy C SP1: Countryside (edited)

'Outside the Built-up Area Boundaries land will be defined as countryside and will be recognised for its intrinsic character and beauty. Development will be permitted in the countryside where it is:

f: in accordance with other policies in the Plan which refer to a specific use or type of development’.

4.2.4 **Policy SD SP3:** Gaps Between Settlements (edited)

‘The generally open and undeveloped nature of the following gaps between settlements, as identified on the Policies Maps will be protected to prevent coalescence and retain their separate identity:

- *Angmering to Worthing.*

Development will only be permitted within the gaps if:

- a. it would not undermine the physical and/or visual separation of settlements;*
- b. it would not compromise the integrity of the gap either individually or cumulatively with other existing or proposed development’.*

4.2.5 **Policy LAN DM1:** Protection of Landscape Character (edited)

‘Development within the setting of the South Downs National Park must have special regard to the conservation of that setting, including views into and out of the Park, and will not be permitted where there would be harmful effects on these considerations.

Development throughout the plan area should respect the particular characteristics and natural features of the relevant landscape character areas and seek, wherever possible, to reinforce or repair the character of those areas’.

4.2.6 **Policy EMP SP1:** Strategic Economic Growth (edited)

‘The Council, with partners, will promote the sustainable growth of the District’s economy to meet the varying needs of different economic sectors and to support regeneration within the two main towns. The Plan allocates circa 75 hectares of employment land in order to provide sufficient flexibility to meet the future needs and aspirations for the District to support the regeneration of Bognor Regis and Littlehampton, support job creation, provide for the needs of modern business, increase the attractiveness of the District as a business location and support the economic development of the coastal market area. This will comprise:

- b. The provision of new high-quality employment sites;*
- c. The provision of land to accommodate employment needs including the expansion of existing employment areas.*
- f. Protecting and enhancing existing and allocated employment sites and premises to meet the needs of business subject to regular review and monitoring.*
- h. Supporting sustainable employment opportunities in inland settlements and rural areas.*
- i. The provision of appropriately scaled development where such uses complement, and are compatible with, employment/commercial uses’.*

4.2.7 **Policy EMP DM1:** Employment Land: Development Management (edited)

'1. Enhancement of employment premises and sites.

The Council will seek to protect and enhance existing employment sites and premises in order to maintain a supply of good quality commercial sites and premises to meet the needs of businesses and the local economy.

The Council will promote and support positive measures to upgrade existing employment areas through:

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

4.2.8 **Policy D SP1:** Design (edited)

'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'.

4.2.9 **Policy D DM1:** Aspects of form and design quality (edited)

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

1. Character

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

2. Appearance/attractiveness

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

3. Impact

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

10. Layout

Utilise existing networks or improve access via delivery of a variety of integrated networks, to and from residential areas, commercial zones, open spaces, facilities and public transport.

15. Aspects of form and design quality

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

4.2.10 **Policy ECC SP2:** Energy and Climate Change Mitigation (edited)

'All new residential and commercial development will be expected to be energy efficient and to demonstrate how they will:

a. Achieve energy efficiency measures that reflect the current standards applicable at the time of submission;

b. Use design and layout to promote energy efficiency; and

c. Incorporate decentralised, renewable and low carbon energy supply systems'.

4.2.11 **Policy T SP1:** Transport and Development (edited)

'The Council will support transport and development which:

f. Explains how the development has been designed to:

iv. Incorporate facilities for charging electric and plug-in hybrid vehicles (where charging facilities are to be omitted from the development, evidence of market demand and viability must be provided); and

4.2.12 **Policy HER SP1:** The Historic Environment (edited)

'The Local Planning Authority will grant planning permission or relevant consent for development proposals that conserve or enhance the historic environment of the District, based on the following approach:

Designated heritage assets including listed buildings, structures and their setting; and Conservation Areas will be given the highest level of protection and should be conserved and enhanced in a manner appropriate to their significance.

Development likely to prejudice any of the above, including their settings, will be refused. Any proposals for development will be required to comply with all other relevant policies and reflect any relevant appraisals or management proposals adopted by the Local Planning Authority'.

4.2.13 **Policy HER DM3:** Conservation Areas

'In order to preserve or enhance the character or appearance of the Conservation Area, planning permission or relevant consent will normally be granted for proposals within or affecting the setting of a Conservation Area, provided that:

a. New buildings and structures acknowledge the character of their special environment in their layout, form, scale, detailing, use of materials, enclosure and the spaces created between buildings;

f. It does not harm important views into, out of or within the Conservation Area’.

4.3 Ferring Parish Neighbourhood Plan 2014-2029

4.3.1 Policy 1A: Spatial Plan for the Parish (edited)

‘Proposals for development located outside of the built-up area boundary that do not accord with development plan policies in respect of the control of development in the countryside will be resisted’.

4.3.2 Policy 7: Land North of Littlehampton Road, encouragement of existing rural business

‘The Neighbourhood Plan will support:

i. Any development shall minimise visual impacts on the surrounding countryside.

ii. All new buildings are located as part of the existing cluster of buildings to ensure existing patterns of development are maintained and to avoid significant incursions into open countryside, wherever possible unless details shown an improved sitting.

iii. Suitable measures are proposed to improve the setting and/or screening of the development within its wider setting of the National Park.

iv. Where appropriate, proposals shall be accompanied by drawings or other images showing impact of the proposed development from key vantage points in the surrounding open countryside’.

4.4 Arun District Council Parking Standards (October 2000)

4.4.1 The parking standards outline that for B1(a) Office use a minimum of 1 space is needed for every 20m² of floorspace up to up to 240m².

4.4.2 The proposal is for approximately 115m² of office floor space, and as such 6 spaces need to be provided for.

4.5 South Downs Local Plan 2014-2033 (July 2019)

4.5.1 Strategic Policy SD6: Safeguarding Views (edited)

‘1. Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the National Park, in particular by conserving and enhancing key views of key landmarks within the National Park.

2. Development proposals will be permitted that conserve and enhance the following view types and patterns identified in the Viewshed Characterisation & Analysis Study:

a) Landmark views to and from viewpoints and tourism and recreational destinations;

b) Views from publicly accessible areas which are within, to and from settlements which contribute to the viewers' enjoyment of the National Park;

c) Views from public rights of way, open access land and other publicly accessible areas.

3. Development proposals will be permitted provided they conserve and enhance sequential views, and do not result in adverse cumulative impacts within views'.

4.5.2 Strategic Policy SD7: Relative Tranquillity (edited)

'1. Development proposals will only be permitted where they conserve and enhance relative tranquillity and should consider the following impacts: a) Direct impacts that the proposals are likely to cause by changes in the visual and aural environment in the immediate vicinity of the proposals;

a) Direct impacts that the proposals are likely to cause by changes in the visual and aural environment in the immediate vicinity of the proposals;

3. Development proposals in poor tranquillity areas should take opportunities to enhance relative tranquillity where these exist'.

4.5.3 Strategic Policy SD12: Historic Environment (edited)

'1. Development proposals will only be permitted where they conserve and enhance the historic environment, including through the safeguarding of heritage assets and their setting.

2. Applicants will be required to provide a Heritage Statement sufficient to allow an informed assessment of the impact of the proposed development on the significance of the heritage asset(s).

3. Development proposals which affect heritage assets (whether designated or non-designated) or their setting will be determined with regard to the significance of the asset, including the long-term conservation and enhancement of that asset.

4. Development proposals will be permitted where they enhance or better reveal the significance of heritage assets, particularly where they are considered to be at risk of irreversible harm or loss.

6. Development proposals for enabling development that would otherwise conflict with other planning policies but which would secure the future conservation of a heritage asset will be permitted provided:

a) The proposals will not materially harm the heritage values of the asset or its setting;

b) It can be demonstrated that alternative solutions have failed’.

4.5.4 **Development Management Policy SD15:** Conservation Areas (edited)

‘1. Development proposals within a conservation area, or within its setting, will only be permitted where they preserve or enhance the special architectural or historic interest, character or appearance of the conservation area. Sufficient information to support an informed assessment should be provided on the following matters:

a) The relevant conservation area appraisal and management plan;

b) Overall settlement layout and relationship to established landscape setting;

c) Historic pattern of thoroughfares, roads, paths and open spaces, where these provide evidence of the historic evolution of the settlement, and the historic street scene;

d) Distinctive character zones within the settlement;

e) Mix of building types and uses, if significant to the historic evolution of the settlement;

f) Use of locally distinctive building materials, styles or techniques;

g) Historic elevation features including fenestration, or shop fronts, where applicable;

h) Significant trees, landscape features, boundary treatments, open space, and focal points; and

i) Existing views and vistas through the settlement, views of the skyline and views into and out of the conservation area’.

4.6 **National Planning Policy Framework (February 2019)**

4.6.1 The National Planning Policy Framework came into immediate effect in February 2019 and supersedes any previous versions of the National Planning Policy Framework.

4.6.2 **Paragraph 7** states:

‘The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs’.

4.6.3 The overarching principle of the NPPF is a clear presumption in favour of sustainable development. **Paragraph 8** states the three dimensions which are interdependent and need to be pursued in mutually supportive ways:

- a) *'an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- c) *an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'.*

4.6.4 **Paragraph 10** states:

*'So that sustainable development is pursued in a positive way, at the heart of the Framework is a **presumption in favour of sustainable development**'.*

4.6.5 **Paragraph 11** states: (edited)

'Plans and decisions should apply a presumption in favour of sustainable development.

For decision-taking this means:

- c) *approving development proposals that accord with an up-to-date development plan without delay; or*
- d) *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:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. *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'.*

4.6.6 **Paragraph 38** states:

'Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure development that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible'.

4.6.7 **Paragraph 47** states:

'Planning law requires that applicants for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing'.

4.6.8 **Paragraph 80** states: (edited)

'Planning policies and decisions should help create the conditions in which business can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future'.

4.6.9 **Paragraph 83** states: (edited)

'Planning policies and decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings'.

4.6.10 **Paragraph 84** states (edited)

'Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements... The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist'.

4.6.11 **Paragraph 108** states: (edited)

'In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) appropriate opportunities to promote sustainable transport modes can be – or have been made, taken up, given the type of development and its location;

b) safe and suitable access to the site can be achieved for all users'.

4.6.12 **Paragraph 110** states: (edited)

'Within this context, applications for development should:

e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations'.

4.6.13 **Paragraph 117** 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'.

4.6.14 **Paragraph 118** states: (edited)

'Planning policies and decisions should:

c) Give substantial weight to the value of suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land'.

4.6.15 **Paragraph 120** states: (edited)

'Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability'.

4.6.16 **Paragraph 120** states: (edited)

'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'.

4.6.17 **Paragraph 122** states: (edited)

'Planning policies and decisions should support development that makes efficient use of land, taking into account:

a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;

b) local market conditions and viability;

c) the availability and capacity of infrastructure and services – both existing and proposed;

d) the desirability of maintaining an area's prevailing character and setting, or of promoting regeneration and change;

e) the importance of securing well-designed, attractive and healthy places'.

4.6.18 **Paragraph 124** states: (edited)

'The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'.

4.6.19 **Paragraph 127** states: (edited)

'Planning policies and decisions should ensure that developments:

a) will function well and add to the quality of the area, not just for the short but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change;

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit’.

4.6.20 Paragraph 130 states:

‘Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development. Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used)’.

4.6.21 Paragraph 131 states:

‘In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings’.

4.6.22 Paragraph 170 states: (edited)

‘Planning policies and decisions should contribute to and enhance the natural and local environment by:

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services’.

4.6.23 Paragraph 172 states: (edited)

‘Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads’.

4.6.24 Paragraph 194 states: (edited)

'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional'.*

4.6.25 **Paragraph 196** states: (edited)

'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.

5 Appraisal

5.1 Introduction

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permissions to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

5.1.2 It is considered that the following issues are important to consider as part of this proposal:

- The principle of development;
- Visual impact;
- Highdown Hill Conservation Area and Listed Garden;
- Design and appearance;
- Energy Efficiency.

5.2 The principle of development

5.2.1 Previously, the applicant wanted to convert the existing grain silo into B1(a) office use rather than demolish or allow the silo to fall into a state of disrepair.

5.2.2 Much to the applicants frustration, after obtaining planning permission, further detailed research demonstrated that the costs of renovating the silo into a B1(a) office space would be unviable, especially when considering how to make the building energy efficient. Therefore, the applicant seeks a sensitively designed new building to ensure that the employment and economic contribution of the site can be realised.

5.2.3 In this respect, it is noted that there has been an expressed need for Office Space in the District. Cluttons 'Commercial Property Market Intelligence Report', which was prepared for Arun District Council to inform the development of their newly adopted Local Plan, notes the following:

Paragraph 2.1: 'Arun District Council has an ageing stock of industrial, warehouse and office premises, mainly found in the centre of Bognor Regis and Littlehampton. The industrial and warehouse premises are largely fit for purpose, as is demonstrated by the fact that there are very few vacant units, but there is a lack of modern premises with very little development having been carried out in the last decade.'

Paragraph 2.2: 'There is a lack of suitable existing premises to cater for any expansion or upgrading of premises by local businesses, or to allow for inward investment requirements.'

Paragraph 3.42: Whilst the industrial and warehouse markets in the district are improving, the office market continues to lag, with low demand, and this affect development viability.

Paragraph 4.12: The offices market along the Sussex coast is largely centred on Brighton, and to a lesser extent, Worthing and Chichester. As far as Arun is concerned, offices are mainly situated in the town centres of Bognor Regis and Littlehampton, and to a lesser extent, Arundel.

Paragraph 4.13: There are very few purpose-built offices in the district, and much of the stock is found in period buildings, or on upper floors above retail'.

- 5.2.4 One of the main reasons the applicant has decided to promote a high-quality office facility is due to this known local need.
- 5.2.5 Having research local employment floorspace websites, such as; Proplist, Prime Location, NovaLoca and Property Link, there are at most a handful of high quality, free standing self-contained office units locally, with most floorspace comprising largely out of date 'above shops' floorspace or mixed industrial/office floorspace.
- 5.2.6 A letter which is attached to this Planning Application sent from an experienced Commercial Agent working for Oakley confirms that the county of West Sussex and the market is suffering from a lack of quality office stock, suited to modern business practises. The letter states that office space is always a sort after commodity due to the lack of options available.
- 5.2.7 The proposal will therefore be a very positive addition to the local commercial stock, helping to meet an identified local need.
- 5.2.8 It is envisaged that if development were to be refused, the applicant would seek a modern office outside of Ferring, but would struggle to find a suitable place within Arun. Therefore, the applicant would be forced to relocate to Brighton, which could potentially reduce employment in the area.

5.3 Visual Impacts

- 5.3.1 The previous permitted application sought the renovation of an existing grain silo such that this application seeks to demolish the grain silo. Therefore, consideration must be given to whether visual impacts will occur from the proposed development over that of the previous scheme and if so whether that impact is harmful.
- 5.3.2 Objective assessment of the previous and current scheme demonstrates that there is little change to the mass or bulk of the proposed office building. The below figure shows the existing grain silo outlined in red, compared to the new office building.

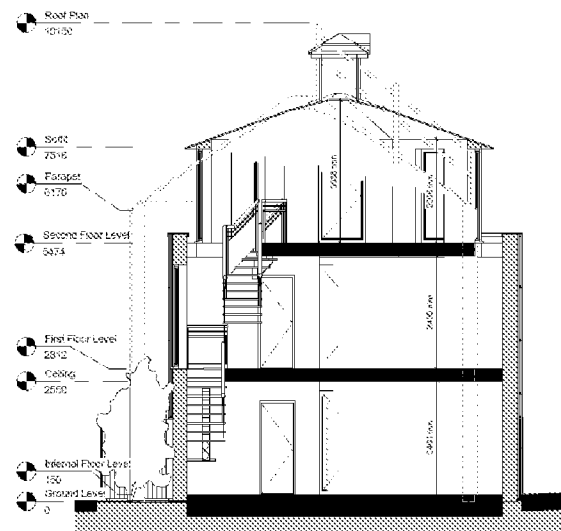


Figure 5: Existing Grain Silo (dotted red line) and Proposed Office Building (Courtesy of Warwick Lane Developments Ltd)

5.3.3 Furthermore, it is noted that the proposed office building will be predominately comprised of corrugated sheet metal and grey render with a zinc roof, similar materials to what the grain silo is comprised of. It is considered that the use of sympathetic materials maintains the agricultural appearance of the previous building.

5.3.4 Considering the above, it is considered that the proposed development conforms to Policy SD SP3 of the Arun District Council Local Plan:

'Development will only be permitted within the gaps if:

a. it would not undermine the physical and/or visual separation of settlements;

b. it would not compromise the integrity of the gap either individually or cumulatively with other existing or proposed development'.

5.3.5 Furthermore, the development conforms to Policy 7 of the Ferring Parish Neighbourhood Plan:

'The Neighbourhood Plan will support:

i. Any development shall minimise visual impacts on the surrounding countryside.

iii. Suitable measures are proposed to improve the setting and/or screening of the development within its wider setting of the National Park'.

5.4 Highdown Hill Conservation Area and Listed Garden

5.4.1 First listed in 1984, Highdown is a grade II* listed Park and Garden which is located to the north east of the application site some 80 metres away and forms part of the Highdown Hill Conservation Area.

- 5.4.2 The house present at Highdown was built in the 1820's, however it was not until 1909 when the house and surrounding grounds were acquired by Sir Frederick Stern that the Gardens were developed.
- 5.4.3 From 1909 – 1967 Sir Frederick and his wife created and developed the present gardens, with many of the original plants grown from newly imported seeds or stock.
- 5.4.4 In 1968 Lady Stern gave the house and Gardens to Worthing Borough Council who since the mid-1970s have restored and managed the gardens to the Sterns' original design. The Council sold the freehold of the house in 1980 and its immediate surroundings to the Chapman Group who run the property as a conference centre and club.
- 5.4.5 Within the Officers Report for Planning Application FG/56/18/PL, it is noted that views of the Highdown Conservation Area from the site are prevented due to dense tree/vegetation screening along the entirety of the service road which is accessed of the A259.
- 5.4.6 It is considered that only the top of the grain silo can be seen from Highdown Gardens, if one is standing from a high vantage point, but it is concluded that the separation distance plus a lack of indivisibility means that the proposal will not impact on the setting of the heritage asset.
- 5.4.7 It is considered that the only elements of the proposed Office Building that could be seen from Highdown Gardens would be the weathervane and the cylindrical roof, which are considered to be in keeping with the sites rural setting.

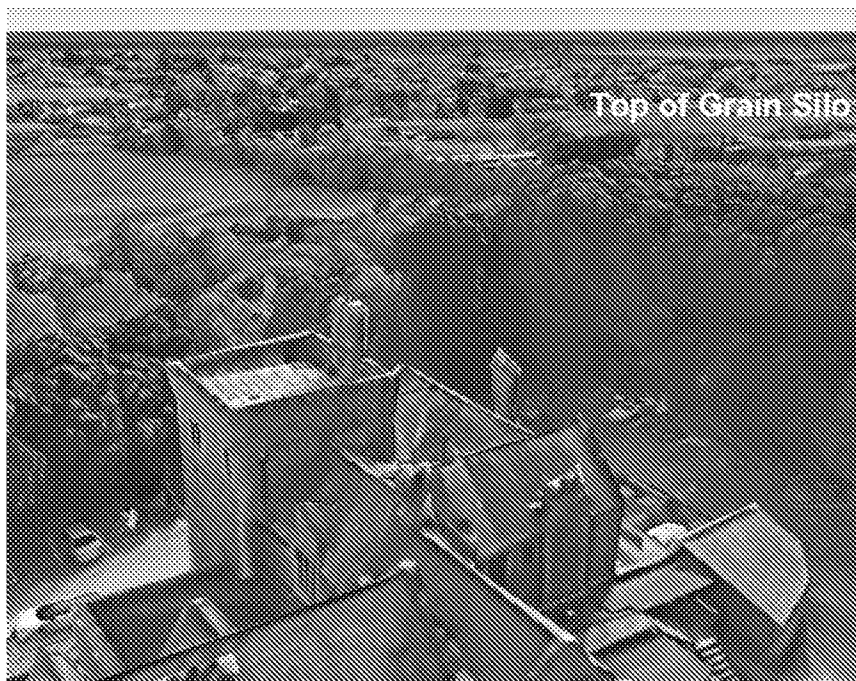


Figure 6: Grain Silo from top of Highdown House CGI (Courtesy of Google Earth)

- 5.4.8 Furthermore, we note that the Officers earlier Report gave weight to Policy C SP1 of the Arun Local Plan, but concluded that, on balance, the development would

not impact on the wider landscape, including the National Park and Highdown Hill Conservation Area.

- 5.4.9 It is therefore considered that as the proposed B1(a) Office Space would not be materially larger than the existing grain silo and therefore it is considered that the development would not harm the Highdown Hill Conservation Area or the setting of the Listed Garden.

5.5 Design and appearance

- 5.5.1 The current grain silo is comprised of corrugated metal of a cylindrical design with a pointed roof and lies adjacent to the unmarked access road.

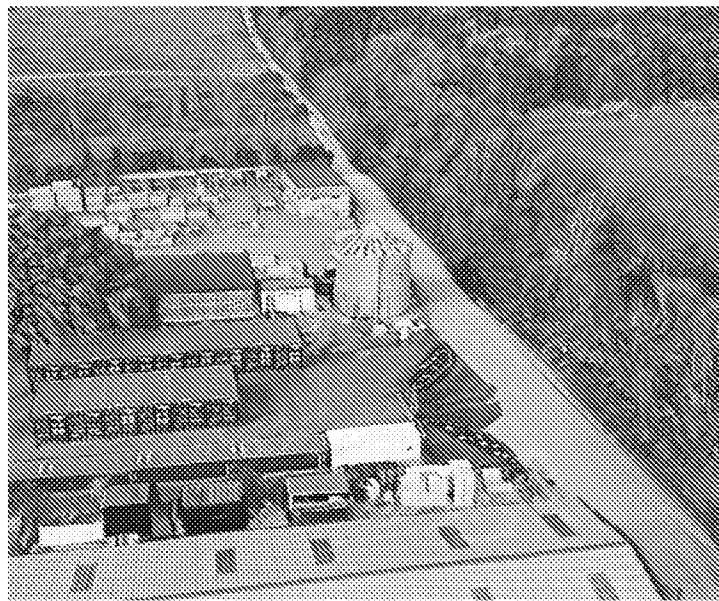


Figure 7: Existing grain silo CGI (courtesy of Google Earth)

- 5.5.2 As aforementioned in Paragraph 5.3.6, the existing grain silo is only visible from Highdown Conservation area if one is standing from a vantage point, as vegetation and shrubbery along the unmarked access road acts as a green barrier.
- 5.5.3 The proposed office building will be predominately comprised off corrugated sheet metal and grey render with a pointed zinc roof, similar materials to what the grain silo is comprised off. It is considered that this maintains the agricultural appearance of the previous building.

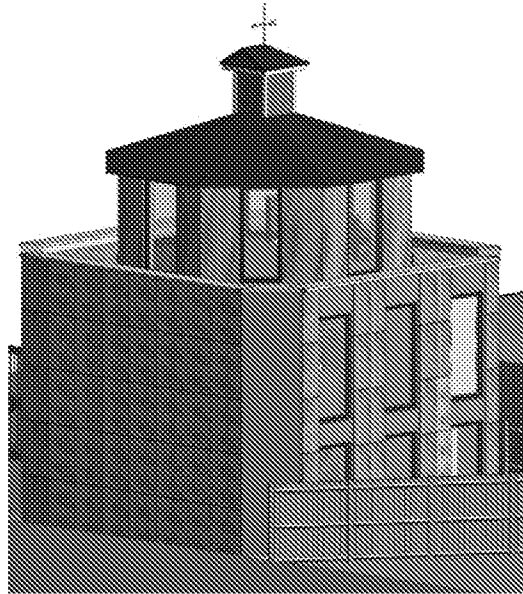


Figure 8: Proposed B1(a) Office Building (Courtesy of Warwick Lane Developments Ltd)

- 5.5.4 Furthermore, it is considered that the cylindrical design of the second floor of the proposed office and the roof makes reference to the grain silo while providing more usable floorspace. This has been done so to protect views from Highdown Conservation area, where only the second floor of the office building would realistically be visible, and the building would still resemble that of the former grain silo.
- 5.5.5 It is therefore considered that by virtue of size, mass, design or bulk, the appearance of the proposed office building would not impact negatively on the surrounding area.

5.6 Energy Efficiency

- 5.6.1 As aforementioned, the applicant obtained Planning Permission ref: FG/56/18/PL on the 15th November 2018 for the existing grain silo to be converted to an Office Building.
- 5.6.2 Following further inspection and research however, the applicant concluded that it would be financially unviable to renovate the structure, and prove too costly to make the grain silo energy efficient.
- 5.6.3 The applicant, who is committed to delivering a more energy efficient scheme than previously submitted has therefore decided to demolish the existing grain silo and instead erect a new B1(a) Office Building, sensitively designed to its surroundings.
- 5.6.4 The applicant also intends to install one electric car charging point on the site to encourage use of Electric Vehicle and hybrid cars, which conforms to local (T SP1) and national (NPPF para. 110) policies.

6 Summary and Conclusion

6.1 Summary

6.1.1 This statement has set out that the demolition of the existing grain silo and the erection of a B1(a) Office Building would not harm the Highdown Conservation Area.

6.1.2 This statement has also demonstrated that there is a need for upgraded office buildings in the area, otherwise local businesses are likely to be forced to relocate to nearby areas such as Brighton where office facilities are well equipped for small companies. It is important to the economic health of Arun that this is prevented, and the best way to do so is by the provision of high-quality self-contained office accommodation.

6.1.3 Furthermore, it has been demonstrated that the development complies to a number of national policies, most notably Paragraph 83 of the National Planning Policy Framework:

'Planning policies and decisions should enable:

a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings'.

6.1.4 Concerning local policies, it is noted that the newly adopted Arun District Local Plan pays great attention to design and appearance of buildings in the setting of Conservation areas. Policy HER DM3 states:

'In order to preserve or enhance the character or appearance of the Conservation Area, planning permission or relevant consent will normally be granted for proposals within or affecting the setting of a Conservation Area, provided that:

a. New buildings and structures acknowledge the character of their special environment in their layout, form, scale, detailing, use of materials, enclosure and the spaces created between buildings;

f. It does not harm important views into, out of or within the Conservation Area'.

6.1.5 It is considered and has been demonstrated that the proposed development would not harm the views into and out of the conservation area, by virtue of the form, scale, use of materials and design of the proposed office building.

6.2 Conclusion

6.2.1 Given the above, it is formally requested that Planning Permission be granted.

6.2.2 If clarity is needed or if I can be of further assistance, please do not hesitate to contact me: [REDACTED]