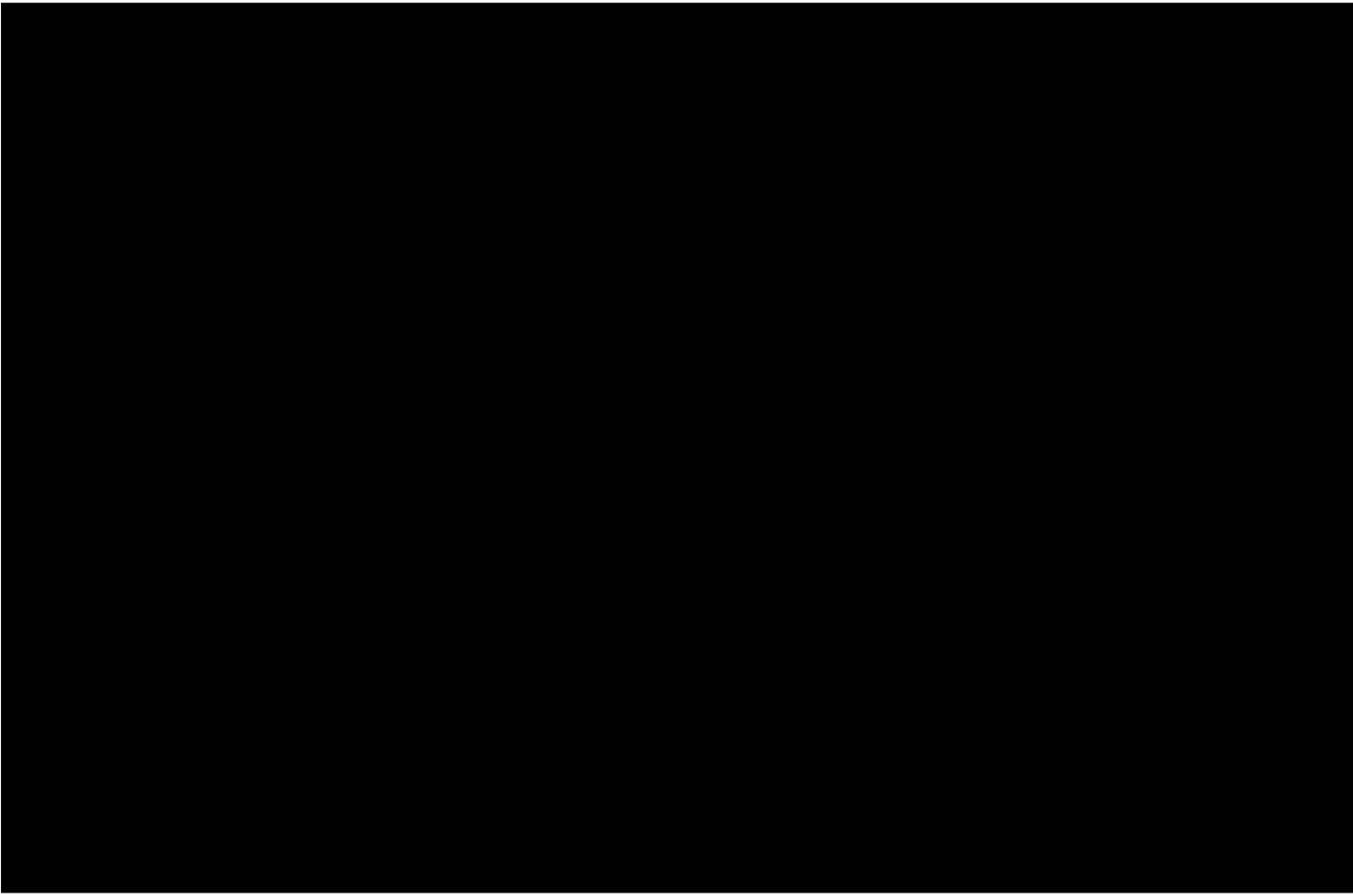




From: Steve Duffy [REDACTED]
Sent: 11 April 2018 16:54
To: Ross Leal
Cc: Planning.Responses
Subject: 17036 - Yeomans Worthing Littlehampton Road, Ferring (ref. FG/39/18/PL)

Dear Mr Leal,

We would like to take this opportunity to introduce ourselves as Agent acting on behalf of Yeoman's Ltd for the above application (**ref. FG/39/18/PL**) in Ferring, Worthing for which we understand you are the Case Officer responsible.

We have been following the initial responses and comments available to view online with interest. We note that;

- Highways have offered no objection to the proposals and agree with the conclusions of the submitted Transport Statement.
- Arun DC's Drainage Engineer have not objected to the proposals subject to certain condition wording being attached to a decision.
- The Environment Agency have not objected to the proposals, subject to certain conditions being attached to any decision.
- Various local residents *have* objected to the scheme – however there are now also a number of supporting comments also.

We have prepared an additional Planning Statement (please see copy attached) which we would like to submit to yourselves for review and inclusion as part of the planning documentation. We have fully reviewed further the national and local planning policies in relation to the site, and the wider community, and have compared this back in a number of instances to some of the consultation feedback that has been received to date.

As outlined in the original letter and supporting documents, this application is a major development for Yeomans, a large local employer, and will offer significant additional local employment opportunities and economic benefit to the area if positively determined. We would welcome the opportunity to work with yourselves to resolve any concerns that you may have or to provide additional information if/as necessary to assist with your review of this application. Should you feel that a meeting would be beneficial to discuss any points then we would also be happy to do so.

We would ask kindly if you could please confirm receipt of this email and the attached supplementary Planning Statement, and we look forward to hearing from you shortly upon review and working with you to determine this important and highly beneficial local development proposal.

Kind regards
Steve

Steve Duffy
Director



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Yeomans Worthing: New Honda Showroom, Workshop & Head Office, supporting facilities & Hard/Soft Landscaping

Planning Statement - April 2018



Planning Policy

Background

Yeomans is a long established local company. Yeomans has operated its Honda showroom and garage from its premises in Horsham Road, Littlehampton for 32 years. The premises in Littlehampton are no longer fit for purpose and the site is too small to be redeveloped to meet the needs of the company and the requirements of Honda. In addition, with the improved road links between Littlehampton and Chichester the Honda dealership in Littlehampton is now in competition with its sister dealership in Bognor Regis.

For these reasons the Honda dealership has to find new premises or close. Any new premises have to be located east of Littlehampton to meet with the approval of Honda. As a result, Yeomans now need to relocate the franchise to this application site in Ferring, Worthing.

The application site (Yeomans Peugeot dealership) in Ferring, Worthing has operated for in excess of 22 years. This site is under-utilised and has considerable scope for redevelopment and expansion.

The proposal is that both Honda and Peugeot would be fully consolidated on the application site with the single site also encompassing Yeomans Head Office. As such the proposal (coupled with the potential for the company to establish a Customer Contact Centre) will retain and enhance local employment opportunities for some 94 people as outlined below:

	Existing jobs	Proposed jobs
Yeomans Honda Showroom	14	19
Yeomans Peugeot Showroom / Compound	31	31
Yeomans Head Office	19	24
Yeomans Customer Contact Centre	0	20
Total	64	94

Having regard to the total absence of any alternative and available sites to the west of Littlehampton the retention of these two dealerships in Arun District is now dependent on the redevelopment of the application site, as proposed.

The National Planning Policy Framework (NPPF)

For planning purposes, the NPPF clearly defines the following terms.

Sustainable development – is about positive growth – making economic, environmental and social progress for this and future generations.

To help achieve sustainable development – planning is not simply about scrutiny, it must be a creative exercise in finding ways to enhance and improve the places in which we live our lives.

Sustainable transport modes - include any efficient, safe and accessible means of transport with overall low impact on the environment, including walking, cycling, low and ultra low emission vehicles, car sharing and public transport.

The NPPF states that the Government is committed to securing economic growth in order to create jobs and prosperity. It is also committed to ensuring that the planning system does everything it can to support sustainable economic growth. Significant weight should be placed on the need to support economic growth through the planning system and there is a presumption in favour of sustainable development.

Sustainable development is identified as having three roles. They include:

- Economic
- Social
- Environmental

In delivering sustainable development the Government advocates building a strong, competitive economy. With this in mind paragraphs 18-20 of the NPPF state:

"18. The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.

19. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore, significant weight should be placed on the need to support economic growth through the planning system.

20. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century."

Regarding the rural area the NPPF specifically states that planning policies should **support economic growth in order to create jobs and prosperity by taking a positive approach to new development.** Local Plans should support sustainable growth and the expansion of ALL types of business and enterprise in rural areas. The courts have held that this relates to large as well as small scale business developments, as well as all types of business development. This represents a significant shift in planning policy.

The NPPF goes on to state that development proposals should be approved without delay where they accord with development plan policies.

The NPPF replaces 'Planning Guidance Note 13: Transport' with the aim to encourage a more sustainable approach to transport. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. However this needs to take into account policies set out elsewhere in the NPPF and in particular rural areas.

In assessing development proposals account should be taken of:

- Opportunities for sustainable transport modes depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- The provision of safe and suitable access to the site for all people.

Regarding design the NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development. New development should function well and create safe and accessible places. Decisions should address the connections between people and places and the integration of new development into the natural and built environment.

In relation to the rural landscape the NPPF seeks to minimize any impact on biodiversity. Great weight should be given to conserving the landscape and scenic beauty in national parks. The application site is in excess of 2km from the boundary with South Downs National Park. Despite this in view of the importance of such landscapes the applicant has sought to ensure that the scheme does not impact on the landscape and scenic beauty of the National Park.

Finally, the NPPF states that in determining applications the LPA should consider the desirability of sustaining and enhancing the significance of all heritage assets. Where a proposal would lead to less than substantial harm to a heritage asset, such harm should be assessed against the public benefits that would result from the scheme. There are several listed buildings and a conservation area within 500 metres of the application site. It is thus necessary to explore if the proposal would have a material impact on them or their setting.

Proposed changes to the NPPF

In March 2018 the Government issued its proposed changes to the NPPF for public comment. These changes are material to the proposal as they reflect current emerging government policy.

The draft NPPF clarifies how to assess proposals against the three roles of sustainable development. It advises that they are not criteria against which every decision can or should be judged. Planning decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account.

The draft NPPF actively encourages discussions and planning policies should be flexible enough to accommodate business needs not anticipated in the Plan, and to enable a rapid response to changes in economic circumstances.

The Draft NPPF continues to allow for the expansion of all types of business in the rural area and policies and decisions should recognise that sites to meet local business needs may need to be located outside built up area boundaries. The use of previously developed land should be encouraged where opportunities exist. It also encourages higher density developments.

Arun District Local Plan 2003 (Local Plan)

Currently the Local Plan for the area comprises the Arun District Local Plan 2003, which is based upon the formerly adopted West Sussex Structure Plan, The South East Plan policies and various Government Guidance which no longer exists. It is out of date.

Paragraph 214 and 215 of the NPPF advises that after April 2013 due weight should be given to relevant policies according to their degree of consistency with the NPPF.

Within the Local Plan the application site is shown as being located in an area of countryside, immediately to the north of the defined built up area for Ferring. The land is not the subject of any landscape or other designation and is located within an intensive cluster of commercial developments of various types.

Contrary to the NPPF policies GEN2 & GEN3 of the Arun District Local Plan seek to restrict most forms of development outside the defined built up area boundaries. They do not allow for new business development in accordance with the NPPF. Policy DEV8 only allows for new development to meet the needs of existing local forms provided that there is no suitable alternative within the built-up area.

As stated in the NPPF where relevant policies are out of date or there are no relevant policies that deal with a particular type of development permission should be granted unless:

"Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies set out in the NPPF as a whole."

The proposal needs to be assessed on this basis.

Policy GEN7 relates to the form of new development, encouraging schemes displaying high quality design and layout. It states that development will be permitted provided it (in brief):

- Makes efficient use of land or buildings;
- Responds positively to the identified characteristics and resources of the site and the area;
- Promotes sustainable development;
- Does not harm the living conditions of existing residents;
- Takes account of any adverse impacts from adjoining land uses;
- Makes a material contribution to the local environment;
- Allows safe movement of pedestrians and vehicles, giving priority to pedestrians; and
- Provides adequate vehicle parking.

The proposal fully complies with the above policy.

Due to its **draft** status this Plan currently carries little weight. A significant number of the objections and comments have already been made concerning its contents, including policies C SP1, T DM1 & SD SP2, SD SP3.

SD SP

This policy states that the Council will apply a presumption in favour of sustainable development as set out in the NPPF. Applications which will help achieve the Council's central aim of increasing employment density will be supported. **Where the Plan has no policies relating to a particular form of development it will be determined in accordance with the NPPF.**

C SP1

Seeks to restrict development outside the defined built up areas, although specifically allows for development that is permitted by other policies in the emerging Local Plan.

SD SP3

Relates to Gaps between settlements. This includes a proposed new gap between Angmering and Worthing. **Objections have been raised to this new designation and one of the main concerns raised is that the southern part of the gap is heavily developed by a range of commercial enterprises. The gap designation could prevent these successful local businesses from adapting and redeveloping to meet their specific business needs.**

In view of the strong objection raised to this policy **very little weight can be given to it at this time.**

LAN DM1

Development which preserves or enhances the landscape character will be permitted.

EMP SP1

Promotes economic growth and the provision of a flexible supply of employment workspace to meet employment and employer generated needs. It seeks to protect and enhance existing employment sites to meet the needs of the business occupying the site. It also seeks to support sustainable employment opportunities in the rural area and to provide land to accommodate both employment and employer generated needs.

EMP DM1

Allow for new employment in the rural area where it is to meet the needs of a local firm and there are no other available sites in the built up area, or through the redevelopment of existing commercial premises in built up and rural areas. It does not however allow for new commercial sites within the existing "gaps". **(This policy is contrary to the more flexible approach in the NPPF).**

Notwithstanding this, the policy also promotes entrepreneurialism and job security through the protection and enhancement of existing employment sites, in order to meet the needs of business. With this in mind the Council will support appropriate proposals for the redevelopment/development of employment floorspace, upgrading or modernization of existing premise and proposals which make more efficient use of under-used employment sites and premises.

D SP1

The scheme achieves a high quality in design

ECC SP2

Employment schemes meet objectives relating to climate change.

T SP1

Growth in the economic base should reduce congestion and promote healthy lifestyles.

Planning Considerations

The following facts are material to the acceptability of redeveloping/expanding the built floorspace on the site:

- The application site has been in employment use for many years and is an existing commercial site. In addition, The application site is currently under-utilised and out of date, having regard to current business needs and demands.

Policies EMP DM1, and EMP SP1 actively seek to **protect, enhance and allow** for the development and redevelopment of existing employment floorspace and sites. Policies EMP DM1 and SD SP1 seek to **increase employment density** and **encourages making more efficient use of under-used employment sites and premises.**

- The existing business which occupies the application site has been operating from this site for in excess of 22 years. It is an established local business and provides direct employment on the application site and compound for in excess of 31 Persons. Yeomans existing Honda site in Littlehampton has operated in excess of 32 years and with the Head Office currently employs 33 local people. With the proposal all of the above jobs will be retained on the application site with the addition of 5 new jobs in the Honda Dealership and 5 new jobs in the Head Office. In addition, a new Customer Contact Centre may be opened subsequently, resulting in a further 20 new jobs. As such the proposal will retain and enhance local employment opportunities for some 94 people.
- Currently the premises in Littlehampton are not fit for purpose and the application site is under-utilised.
- The site is ideally located in relation to the required catchment areas for both Peugeot and Honda.

Together policies CSP1 and EMP DM1 specifically allow for existing businesses to expand on existing employment sites within the rural area, including within designated "gaps". Policy SD SP1 encourages increasing employment density. Policy DEV8 similarly allows existing local firms to locate within the rural area and on existing commercial sites.

- The site is located in an accessible location close to bus and cycle routes and within cycling distance of at least 2 railway stations. It is also adjacent to the strategic road network. Not only is this convenient for customers and staff, it enables new cars and parts to be delivered to the site without the need to travel within built up areas.
- The site is located close to a large local workforce and within a large customer catchment area. The business provides local employment and a local service in a highly accessible location.

Policy T SP1 encourages economic growth associated with reduced congestion and healthy lifestyles. Policy ECC SP2 encourage employment schemes which meet objectives relating to climate change.

- The proposed scheme is designed to a high standard visually and in terms of its usability. It will blend in appropriately into its surroundings, which are heavily influenced by the A27 trunk road, the intense range of commercial buildings and other buildings along the northern edge of the A27 and to the north of the application site. It is also influenced by the housing and commercial developments on the south side of the A27 in the immediate area. It will preserve the character and appearance of its surroundings and the landscape in general within the area. (See Design and Access Statement for full assessment)
- The proposed scheme will not encroach into the open countryside. By making full and effective use of an existing developed site the scheme will help minimize the development of greenfield sites, whilst helping meeting to meet the shortfall of employment floorspace in Arun District.
- There are no ecological reasons why this site could not be more effectively used.

For these reasons the proposal fully complies with policies D SP1, LAN DM1 and GEN7.

Loss of an existing dwelling

It is accepted that the proposal would result in the loss of an existing bungalow. However, this needs to be weighed against the following factors:

- The proposal will retain 64 local jobs.
- The proposal will result in some 30 additional jobs in Arun District
- The proposal will provide a two cars showrooms and associated workshops for use by residents of Arun District.
- While the NPPF seeks to provide new homes, it also states that the Government is committed to securing economic growth in order to create jobs and prosperity. It is also committed to ensuring that the planning system does everything it can to support sustainable economic growth. Significant weight should be placed on the need to support economic growth through the planning system and there is a presumption in favour of sustainable development.
- There are no policies at National or Local level which seek to prevent the loss of existing dwellings.
- Overall, the merits of the proposal weigh heavily in favor of the scheme, notwithstanding the loss of the existing dwelling. Also, there is **no policy objection** to the loss of the dwelling.

Sustainability

The proposed development by Yeomans will meet the economic, social and environmental roles of sustainable development in the following ways.

Economic

- The scheme will meet the needs of Yeomans and is vital to the retention of the existing Honda (Littlehampton) and Peugeot dealerships in Arun District.
- The scheme will retain 64 local jobs in Arun District.
- The scheme will provide an additional 30 jobs in Arun District.
- The scheme will help address the current shortfall of employment sites and premises in Arun District.
- The scheme will make full and effective use of an existing employment site.
- The scheme will provide indirect employment in the local area for taxi's, laundrettes, restaurants, shops, banks, etc. generated by the business, staff and customers.
- The proposed development will make a significant contribution to the local and wider District economy.

Social

- The scheme will provide a high quality working environment for all of its staff.
- The proposal will retain two important local services in Arun District, close to a wide catchment area.
- The scheme will provide employment for local people.
- Help sustain local bus services.
- Help sustain local businesses.

Environmental

- The proposed scheme has been designed and will be constructed to achieve extremely high levels of energy conservation.
- The proposal includes appropriate green infrastructure and will generate low levels of waste.
- The proposed use will help sustain the bus route along the A27.
- The proposal will help sustain local rail services.
- The proposed site is central to the businesses staff and customer catchment areas. (It has to be borne in mind that this is a car related business and so wherever it is located it will generate car

movement. However, staff and customers will be able to make use of the local bus and train services which are highly convenient when travelling to work, for clients when dropping off or collecting their vehicles. Many will also be able to walk or cycle to and from the premises.

- Having regard to the location of the site it will minimise congestion in the built up areas along the coastal strip.

Sustainable Development Conclusion

The proposal readily complies with the three roles of sustainable development and can only be described as meeting the Governments definitions for sustainable development. It complies with all relevant policies set out in the adopted and emerging Local Plans and is located on an existing under-utilised employment site.