

ECE Planning

Planning Statement

Highdown Farm, Ferring

June 2019



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Project Name: Highdown Farm

Location Highdown Farm, Littlehampton Road, Ferring,
BN12 6

Client: Mr Michael Jones

File Reference: P1641

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1. Introduction

- 1.1. This Planning Statement has been prepared by ECE Planning on behalf of our client, Mr Michael Jones, in support of the proposed development for:

“Provision of two commercial B1/B8 use buildings with associated car parking, access and refuse storage on land at Highdown Farm, Littlehampton Road Ferring”.

- 1.2. This statement sets out the relevant background for the determination of the planning application including a description of the site and its surroundings, the relevant planning history, relevant planning policy, details of the development proposal and an assessment of the relevant planning considerations.
- 1.3. In support of the application, this Statement will examine relevant planning policy and guidance. The proposals for the site have been informed by the National Planning Policy Framework, the National Planning Practice Guidance, the Arun Local Plan, and the Ferring Neighbourhood Plan.
- 1.4. This Planning Statement is accompanied by the following documents:

Application Forms and Notices
Design and Access Statement
Drainage Statement
Suite of Drawings

2. The Site

- 2.1. The site lies within the existing industrial estate of Highdown Farm and is situated to the north of the A259 Littlehampton Road, and to the north east of Highdown Vineyard. Immediately to the east of the site is an open sports field, including a football pitch.
- 2.2. The site and its immediate surroundings consist of a former horticultural nursery (McIntyre Nursery) which has now been subdivided into several commercial uses. The site is therefore surrounded by commercial buildings such as a timber merchants yard located to the north of the site. The wider site contains an existing B8/B1 use commercial building used by the company PHS for storage and distribution of washroom products. The site on which this application relates contains car parking, unused land and a portacabin.



Figure 1. Location Plan (Google Maps 2019)

- 2.3. The site is accessed via the existing access located off the north carriageway of the A259 Littlehampton Road.
- 2.4. Within 1.5km of the site there are a number of local services and amenities. There is a bus stop located within approximately 100 metres of the site, which offers local bus services to Arundel and Shoreham. Goring by sea station is within 1.25 km of the site, and can be accessed via pedestrian footpaths in a walk time of approximately 15 minutes. The station offers railways links to London Victoria, Littlehampton, Brighton, and other surrounding areas.
- 2.5. The surrounding area to the north and east is predominantly rural in character and lies adjacent to the South Downs National Park (SDNP).



Figure 2. Environmental Flood Agency Map

- 2.6. The site is located within Flood Zone Risk 1 (Lowest Risk of Flooding) where there is limited risk of flooding.

3. Planning History

- 3.1. A search of the Arun's online planning register reveals that there is no planning history for the application site. However, there are a number of applications pertaining to the wider industrial premises within close proximity to the site. The following is ordered chronologically with the most recent application being first.
- 3.2. **FG/56/18/PL. Change of use & conversion of existing grain silo (Sui Generis) to office space (B1(a) Business) with associated parking Old Grain Silo Former McIntyre Nursery Littlehampton Road Ferring BN12 6PG. Approved 12/11/18.**
- 3.3. The Council considered the proposed works to the silo and its proposed future commercial use to conflict with policy C SP1 of the Arun Local Plan. However, the Council considered the impact on the wider including nearby residential properties as being acceptable and subsequently recommended for approval.
- 3.4. **FG/33/18/PL. Demolition of polytunnels, use of land for Class B8 container self-storage & the siting of 42 No. single-stacked storage containers, an office/toilet portable building, new fencing, gates, CCTV, lighting & alterations to the entrance. This application is a Departure from the Development Plan. Land at former McIntyre Nursery Littlehampton Road Ferring BN12 6PG. Approved 05/10/18.**
- 3.5. The Council considered the use of the site for the stationing of 42 storage containers to conflict with policy C SP1 of the Arun Local Plan and the Angmering - Worthing Gap policy SD SP3. However, on balance, the Council considered the impact on the wider landscape including nearby residential properties to be acceptable and recommended for approval.
- 3.6. **FG/59/10/.Change of use from former agricultural nursery to B8 storage and wholesale supply of fencing and associated materials (This application is a Departure from the Development Plan). Approved, Land North of McIntyres Nursery Littlehampton Road Ferring BN12 6PG. Approved 15/09/10**
- 3.7. **FG/160/05/ Change of use of redundant horticultural packhouse to B1/B8 (Business/Storage/Distribution) use. Approved. 15/03/06.**

4. The Proposal

- 4.1. The proposal seeks the redevelopment of land and buildings at Highdown Industrial Estate to allow for the provision of two new commercial units comprising B1/B8 employment floorspace as follows:
- Unit 3 – 207sqm; and
 - Unit 4 207 sqm.
- 4.2. In addition to the planning application, the existing building to the north of the application site will be altered and improved through Part 7 Class G and H of the General Permitted Development Order Regulations (2015). This is not included within the application site boundary however it has been shown on the plans for background information purposes.

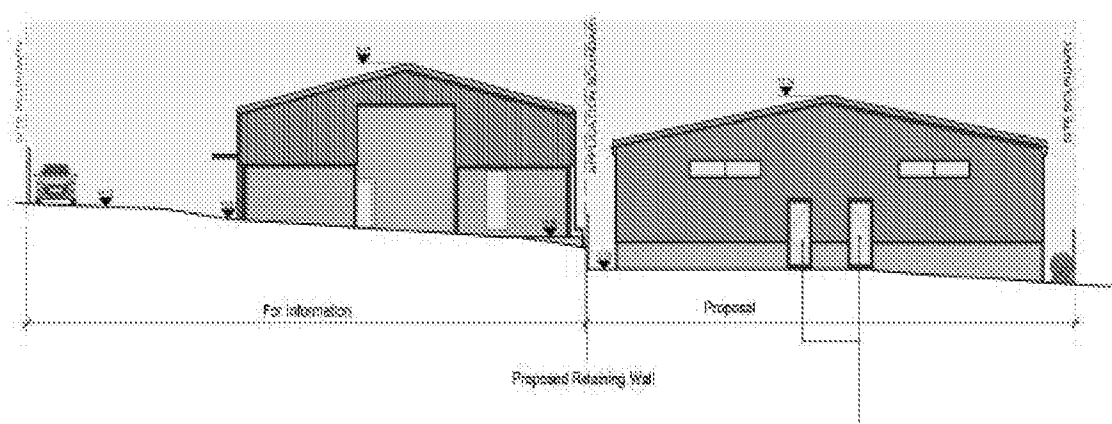


Figure 3. Proposed Elevational Treatment

- 4.3. Vehicle and pedestrian access to the site will be achieved via the existing Highdown Industrial Estate access to the south and east of the site off Littlehampton Road. The proposal will include a total of 11 car parking spaces, comprising 6 spaces for each unit proposed, which is in line with the West Sussex County Council (WSCC) Car Parking Standards.
- 4.4. In term of the layout, the proposal seeks to deliver 2 adjoining commercial units, utilising existing previously developed land and building footprint. The building has been orientated in order to make efficient use out of available daylight within each unit. Three rooflights are also proposed on each unit, in addition to high level windows to allow sufficient solar grain.
- 4.5. The design of the commercial units will reflect a typical commercial building design providing functionality through the use buff brick plinth and grey metal cladding and roof. The use of materials will not harm the surrounding SDNP, and rural area.
- 4.6. The provision of additional planting is proposed along the west boundary to screen the proposal from adjacent properties and wider landscape.
- 4.7. Further detail on the proposal is provided within the accompanying drawings and Design and Access Statement.

5. Policy Overview

5.1. Introduction

- 5.1.1. A key role of the planning system is to regulate the development and use of land in the public interest. At the heart of the planning framework are Statutory Development Plans, which seek to guide the decision making process. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires, that where the Development Plan contains relevant policies, and application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.1.2. In this case the Development Plan (excluding minerals and waste) for the area consists of the following:
- The Arun Local Plan 2018;
 - Proposals Map; and
 - Ferring Neighbourhood Plan 2015.
- 5.1.3. This section considers how the proposed commercial redevelopment application complies with relevant National and Local Planning Policy

5.2. National Planning Policy Framework (NPPF)

- 5.2.1. The NPPF (2019) is a material consideration in the determination of all planning applications. Those relevant parts of the NPPF in the consideration of Application relate to the the requirement for good design, the promotion of sustainable transport, and the presumption in favour of sustainable development.
- 5.2.2. The role of developments in providing for sustainable development cannot be underestimated, with the delivery of two high quality commercial units which make efficient and effective use of an existing commercial site. This is supported under the provisions of **Paragraph 8** of the NPPF.
- 5.2.3. **Paragraph 11** promotes the presumption in favour of sustainable development and confirms that development proposals that accord with the development plan are to be approved without delay; and where there are no development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission: unless specific policies in the NPPF indicate otherwise or it would result in an adverse impact which would demonstrably outweigh the benefits.
- 5.2.4. **Paragraph 83** states Planning Policies and decision should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings, and well designed new buildings.
- 5.2.5. **Section 9** promotes sustainable transport and how this can be delivered through the planning system. **Paragraph 103** states that 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. Additionally **paragraph 109** 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 would be severe’*.
- 5.2.6. **Section 11** encourages the effective use of land and **paragraph 118** states that *“planning policies and decisions should:*

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c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively.”

5.2.7. In this regard, the proposals seek to make efficient and effective re-use of land to provide two new commercial units which would be a small but valuable contribution towards the rural economy.

5.2.8. **Section 12** of the NPPF seeks to demonstrate the Government's commitment to good design and states at **paragraph 124** that *‘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’*. The proposals have given full consideration to this requirement of high quality design within the Framework.

5.2.9. In conclusion it is strongly argued that the proposals have considered fully those objectives of the National Planning Policy Framework.

5.2.10. The National Planning Practice Guidance (NPPG) was published by the Government in March 2014 and supplements those overarching objectives of the National Planning Policy Framework. The guidance provided by the NPPG

5.3. Strategic Planning Policy – Arun Local Plan 2018

5.3.1. The recently adopted Arun Local Plan 2018 sets out the strategic vision, objectives, policies and proposals for development in the LPA to 2031 and beyond. The following policies in the Local Plan are considered relevant to this application:

5.3.2. **Policy C SP1 (Countryside)** states outside 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 for the diversification of the rural economy.

5.3.3. **Policy SD SP1 – Sustainable Development** states that *‘when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development ... proposals can be approved wherever possible...’*

5.3.4. **Policy SD SP3 Gaps Between Settlements** states the general open and undeveloped natures of the strategic gaps will be protected to prevent coalescence where development will only be permitted within the gaps if:

- a) It would not undermine the physical and visual separation of settlements;
- b) It would compromise the integrity of the gap, either individually or cumulatively with other existing or proposed development
- c) It cannot be located elsewhere; and
- d) It maintains the character of the undeveloped coast;
- e) Or if a subsequent DPD or Neighbourhood Plan deems it appropriate through an allocation.

5.3.5. The application site is located within a settlement gap however it is made up of brownfield land and located within a commercial use area. The proposal will therefore not undermine the physical and visual separation of the settlements.

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- 5.3.6. **Policy D SP1 – Design** states that *‘All development proposals should seek 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...’*. This policy is further supported by **Policy D DM1 Aspects of Form and Design Quality**.
- 5.3.7. **Policy T SP1 Transport and Development** ensures that development provides safe access onto the highway network; contributes to highway improvements and promotes sustainable transport, including the use of the cycle, pedestrian and bridleway network. This Policy also states that the Council will support development, which is designed to reduce the need to travel by car, incorporates appropriate levels of parking in line with West Sussex County Council guidance on parking provision.
- 5.3.8. The car parking spaces provided as part of this development is in accordance with the WSCC Parking standards. The proposals are also considered to promote sustainable transport through both the location of the development in relation to public transport and key local services and the provision of secure cycle storage for bikes
- 5.3.9. **Policy HER SP1 The Historic Environment** states the local planning authority for development proposals will grant planning permission that conserve or enhance the historic environment of the district.
- 5.3.10. **Policy ENV SP1 Natural Environment** states the Council will encourage and promote the preservation restoration and enhancement of biodiversity and the natural environment through the development process and particularly through policies for the protection of non-designated sites.
- 5.3.11. **Policy ENV DM4 Protection of Trees** states proper provision must be made for the protection and management of tree or areas of woodland on-site where undertaking development.
- 5.3.12. **Policy ENV DM5 Development and Biodiversity** states development schemes shall seek to achieve a gain in biodiversity and protect existing habitats on site. Where there is evidence of protected species applications shall include a detailed survey of the subject species, with details of measures to be incorporated into the development scheme to avoid loss of the species.
- 5.3.13. The application site does not contain any important habitats or species, and the proposal will therefore not have any negative biodiversity impacts. Additional planting will be provided on the boundary of the site, which will contribute to biodiversity enhancements.
- 5.3.14. **Policy LAN DM1 (Protection of Landscape Character)** states development within the setting of the SDNP 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.
- 5.3.15. The SDNP is located to the north of the site. The proposal will be located within an existing industrial yard on brownfield land therefore the proposed development will not impact negatively on the SDNP or wider landscape.
- 5.3.16. **Policy W SP1 Water** states the Council will support development that is appropriately located, taking account of flood risk and promotes the incorporation of mitigation measures into new development, particularly Sustainable Drainage Systems that reduces the creation and flow of surface water and improved water quality. **Policy W DM3** also covers sustainable drainage systems appropriate to the size of the development.

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- 5.3.17. A Drainage Strategy has been submitted as part of this planning application, which is outlined in further detail in Section 6 of this Statement.
- 5.3.18. **Policy QE SP1 Quality of the Environment** states the Council requires all development to contribute 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 within the district.
- 5.3.19. The proposal provides a more than satisfactory environment for existing and future occupants, including adequate provision for daylight/sunlight, privacy and private outdoor space.
- 5.3.20. **Policy QE DM2 Light Pollution** states planning permission for proposals, which involve outdoor lighting must be accompanied by a lighting scheme prepared according to the latest national design guidance where there should be no adverse impact on neighbouring uses or the wider landscape, light levels being the minimum required for security and working purposes, minimise potential glare and spillage; and the degree to which outdoor lighting can be powered by on-site renewable resources.
- 5.3.21. Lighting as part of the proposal will be kept to a minimum.
- 5.3.22. **Policy QE DM1 Noise Pollution** states to safeguard the continued use of existing industrial and commercial uses and to protect amenity, noise sensitive development should not normally be permitted where:
- c) high levels of noise will continue throughout the night;
 - d) there is a likelihood of complaints about noise from industrial development.
- 5.3.23. The use of the site for B1/B8 purposes will remain as existing, and will therefore not cause any additional noise impacts.
- 5.4. **Other Relevant Development Policies – Ferring Neighbourhood Plan 2015**
- 5.4.1. The Ferring Neighbourhood Plan was made on the 14th January 2015 and forms part of the Statutory Development Plan for this part of the District. The following represents the most relevant Planning Policies, which have been taken into consideration as part of this planning application.
- 5.4.2. **Policy 1A Spatial Plan** for the Parish states proposals for development located outside the built up area boundary that do not accord with the development plan policies in respect of the control of development in the countryside will be resisted.
- 5.4.3. **Policy 7 Land North of Littlehampton Road** encouragement of existing rural business, the Neighbourhood Plan will support:
- Any development shall minimise visual impacts on the surrounding countryside;
 - All new buildings are located as part of the existing clusters of buildings to ensure existing patterns of development are maintained and to avoid significant incursions into open countryside wherever possible unless details show an improved sitting
 - Suitable measures are proposed to improve the setting and or screening of the development within it wider setting of the SDNP

- Where appropriate, proposals shall be accompanied by drawings or other images showing impact of the proposed new development from key vantage points in the surrounding open countryside;
- Development will be permitted in exceptional circumstances for example if it is essential to meet utility infrastructure and no alternative site is available.
- The Neighbourhood plan will resist any proposals for a change of use from an established agricultural, horticultural or equine use or any other unrelated uses.

5.4.4. The site will provide additional rural employment opportunities, and will be located within an existing industrial estate. Additional boundary planting is also proposed to provide appropriate amenity screening. The proposal is therefore in accordance with Policy 7.

5.4.5. **Policy 10 Sustainable Drainage Systems and Water Management** proposals for development that are able to demonstrate that their sustainable drainage design features will be effective in managing flood risk within and beyond their boundary will be supported and may incorporate permeable driveways and parking areas, water storage features, soakaways, other suitable and effective technical solutions recommended by a flood risk assessment.

5.4.6. The Planning Application is supported by a Drainage Assessment, which has been outlined further in Section 6 of this Planning Statement.

6. Planning Appraisal

6.1. Introduction

6.1.1. The principle issues in relation to this proposal are as follows:

Principle of Development
Design, Form and Appearance
Access, Transport and Parking
Heritage and Landscape
Flood Risk and Drainage
Sustainability, Noise and Lighting
Arboriculture and Ecology

6.1.2. These issues are addressed in further detail below.

6.2. Principle of Development

6.2.1. The proposal seeks to deliver additional B1/B8 employment floor space, which will seek to complement the existing uses of the industrial estate. The application site is located within a settlement gap, and is policy protected to prevent coalescence of settlements. The application site however is located within an existing industrial yard surrounded by buildings. The proposal will therefore not have an impact on the settlement gap, and will make use of commercial brownfield land whilst not undermining the surrounding openness of the landscape.

6.2.2. The Ferring Neighbourhood Plan (2015) supports rural business development in land north of Littlehampton Road, subject to not impacting on the wider landscape. The proposal is located within the land located to the north of Littlehampton Road, and will provide additional rural employment space supporting the rural vitality and viability of the area. The provision of high quality employment space is therefore considered to be extremely beneficial and will encourage business and employment opportunities helping to address encourage inward investment.

6.2.3. The proposal is therefore considered to be entirely acceptable in principle according with the adopted Plan and NPPF.

6.3. Design, Form and Appearance

6.3.1. With regards to the design approach, the proposal has been carefully considered in terms of layout, scale, mass, height and appearance with reference to the immediate context and industrial nature of the area.

6.3.2. The proposed buildings will be commensurate in height to the surrounding commercial buildings where the new units will be single storey and the overall height across the site is generally consistent. The commercial building has also been designed to sit in harmony with neighbouring commercial properties.

6.3.3. The proposed buildings will site side by side, and will contain roller shutters and pedestrian access to the east to allow safe and suitable access for loading and unloading of vehicles. The proposal contains windows and rooflights in which sufficient sunlight and daylight can be provided for future employers to maximise potential solar gain.

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- 6.3.4. The proposed appearance of the scheme is therefore designed to respond to the existing rural setting whilst providing functionality for the commercial use. The materials will be consistent with the existing uses therefore sympathetically fitting into the surrounding area and character of the site.

6.4. Access and Parking

- 6.4.1. The proposed units will be accessed to the east off the existing vehicle access route through the industrial park. The proposed buildings will be orientated to allow continuation of the general existing vehicle access approach. Employers and visitors parking is proposed along the eastern side of the site to allow safe and suitable car parking and turning space.
- 6.4.2. The application site is already used for existing B1/B8 uses and the proposal will not cause a significant additional amount of vehicle congestion or traffic resulting from the traffic generated by the proposed development and that overall; there are no unacceptable highway or transport impacts as a result of the proposed development.
- 6.4.3. The proposal will provide 11 car parking spaces, entirely appropriate to the B1 / B8 use and in line with WSCC maximum standards. The proposal is also within close walking distance to existing Bus Stops and other sustainable transport modes. The proposal will also provide cycle storage.

6.5. Heritage and Landscape

- 6.5.1. The application site is not landscape or heritage designated, but the SDNP surrounds the site to the north. Notwithstanding, the site constitutes brownfield land and is located within a collection commercial buildings and land. The existing industrial yard is also well screened by vegetation along the boundary, and the proposal will provide additional planting to help with screening views.
- 6.5.2. Given that the site is not changing use class it will not result in significant intensification of the site, the proposal will not impact negatively on the SDNP or wider rural landscape.
- 6.5.3. The proposal is therefore in accordance with the Development Plan and NPPF.

6.6. Flood Risk and Drainage

- 6.6.1. The site is located within flood zone risk 1 where there is limited risk of flooding.
- 6.6.2. A Drainage Statement has been submitted as part of this planning application, which investigates both surface and foul water drainage from the proposed development within the site. It has been recommended that surface water be discharged via infiltration to ground by a subbase storage system beneath the parking area. In relation to foul drainage, a cesspool is proposed to serve the proposed units.
- 6.6.3. The proposal is therefore in accordance with the Development Plan and NPPF.

6.7. Sustainability, Noise and Lighting

- 6.7.1. The design has been greatly influenced by the site's location and environmental constraints together with the accommodation requirements. In this regard, the building design and layout has responded to energy consumption by seeking to reduce the need for energy consumption through passive measures, ensuring that equipment which is required is as efficient as possible and increasing efficiency through use of appropriate technology.

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- 6.7.2. In terms of noise, the proposed development is being built on an existing industrial site; the nearby residential receptors will already be subject to commercial noise. Additionally, there will be no additional noise created from the development.
- 6.7.3. The proposal will keep light spillage to a minimum through low level security lighting only.
- 6.8. **Arboriculture and Ecology**
 - 6.8.1. The site contains no potential for biodiversity, and therefore has no ecological value. The scheme makes use of brownfield commercial land and does not impact on greenfield land and will therefore not have any additional impact biodiversity.

7. Conclusions

- 7.1. This Planning Statement has been prepared by ECE Planning on behalf of our client, Mr Michael Jones , in support of the proposed development for the *“provision of two commercial B1/B8 use buildings with associated car parking, access and refuse storage on land at Highdown Farm, Littlehampton Road Ferring”*.
- 7.2. The proposed development has been assessed and all relevant National planning guidance, local planning policies, guidance and other material considerations and has been found to be acceptable.
- 7.3. The design of the proposed development has been fully informed by the context of the site and is strongly contended to be fully in keeping with its surroundings in relation to its layout, form, mass, height and density.
- 7.4. The proposal is considered to be acceptable in principle addressing the requirements of the Arun Local Plan and Ferring Neighbourhood Plan providing high quality employment space. This is considered to be of significant benefit to the local area and indeed by building on the success of the existing industrial area.
- 7.5. The proposal is located within a highly sustainable location within close proximity of numerous sustainable transport options.
- 7.6. The proposal in our view positively contributes to the visual amenity of the local area.
- 7.7. The Council is therefore respectfully requested to grant full planning permission for this development.