

Mr S Davis
Principal Planning Officer
Arun District Council
Civic Offices
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

26 February 2018

Dear Mr Davis,

**Salt storage building, office building and yard area for Highways deport
associated with the maintenance of the A27 Trunk Road.**

I have pleasure in enclosing my client's planning application for the above.

If you require any further information please do not hesitate to contact me.

Yours sincerely,

Elizabeth Lawrence

Chartered Town Planner

Elizabeth Lawrence Ltd

West Sussex County Council, Maltravers Road, Littlehampton, BN17 5LF



Ford Depot, Ford Lane, Ford.

Planning, Design and Access Statement - February 2018

Context

The application site is situated to the south of Ford Lane and within the northern end of the former runway at Ford Airfield and comprises an area of hardstanding used for storage, access and parking purposes. The site is located immediately to the west of the existing highways and haulage depot, which is occupied by a subsidiary of Costain (on behalf of the Highways Agency) and Bleach of Havant.

The Highway depot is used for keeping the A27 flowing between Portsmouth and Brighton. They are responsible for removing spillages, fallen trees, accidents, temporary lights and salting the roads. The Highways Agency would like to operate out of a purpose built depot in the immediate area.

Bleach of Havant is a long established local haulage company that specialises in the transportation of horticultural and associated products.

Bleach of Havant are needing to expand as their maintenance department is currently located elsewhere. The lease of their other site is coming to an end and they would like to accommodate all activities on a single site.

Proposal

The proposed scheme includes the construction of an office building, a salt storage building and associated open storage, parking and turning for use as a highways dept. The existing depot will then be fully occupied by Bleach of Havant. Thus, the proposal will meet the needs of two important local businesses, on sites that are ideally suited to their needs in terms of location and facilities.

Planning Policy

National Planning Policy Framework (NPPF)

For planning purposes the National Planning Policy Framework clearly defines the following terms.

Sustainable – ensuring that better lives for ourselves doesn't mean worse lives for future generations.

Sustainable Development – is about change for the better, and not only in our built environment. (It is about the natural environment, the historic environment and higher standards of design).

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 overall planning policies of relevance to this appeal have been set out in the National Planning Policy Framework (NPPF).

The NPPF seeks to achieve sustainable development, which has three dimensions, namely:

- An economic role;
- A social role; and
- An environmental role

The NPPF introduces a presumption in favour of sustainable development. Where a development accords with an up-to-date Local Plan it should be approved. Local Planning Authorities should positively seek opportunities to meet the development needs of their area. With this in mind the planning system should provide the supply of housing required to meet the needs of the present and future generations; and protect the natural and built environment. Where the development plan policies are out of date planning permission should be granted unless:

- any adverse impacts would significantly and demonstrably outweigh the benefits, when assessed against the NPPF as a whole.

The Core principles of the NPPF are to adopt a pro-active approach.

In relation to the rural economy sustainable growth and the expansion of **all** types of business should be supported through conversions and well designed new buildings. In relation to land based rural businesses the NPPF states that their development and diversification should be promoted. This positive approach to rural businesses is to promote a strong rural economy. As stated in the NPPF the Government is committed to securing

economic growth and ensuring that the planning system does everything it can to support such growth. Investment should not be over-burdened by the combined requirements of policy expectations.

In meeting the needs of everyone the NPPF states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.

Regarding National Parks the NPPF states that valued landscapes should be protected and enhanced. Great weight should be given to conserving their landscape and scenic beauty and the wildlife within them. At the same time biodiversity should be protected and enhanced.

Concerning design the NPPF states that new development should function well and add to the overall quality of the area; establish a strong sense of place, optimise the potential of the site and reflect the identity of local surroundings, while not preventing or discouraging appropriate innovation. Planning decision should not stifle innovation, originality or initiative.

In relation to transport the NPPF states that transport policies have an important role to play in facilitating sustainable development and in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel and the transport system needs to be balanced in favour of sustainable transport modes. However the Government realises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.

The NPPF goes on to state that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. Where reasonable to do local authorities should support a pattern of development which facilitates the use of sustainable modes of transport.

Decisions relating to developments that will generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in the NPPF, particularly in rural areas.

The scheme was designed specifically to comply with all of the above and thus to accord with the NPPF.

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 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 to the northeast of the defined built up area of Yapton. It is not within or close to any conservations areas, listed buildings or sites of special interest.

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 as required by the NPPF.

It should be noted that there are no adopted Local Plan policies for the area which seek to increase the supply of business sites in the District despite a clear need. Similarly, there are no policies that deal with the retention or expansion of existing business sites either in the urban or rural area.

Policy DEV8 does however allow for local firms to locate in the rural area, but only where no alternative can be found in the built-up area subject to other stated criterion. This includes accessibility to public transport, visual impact, etc. Any permission may be subject to occupancy conditions.

Policy GEN7 relates to the form of new development, encouraging schemes which display 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.

Arun Local Plan 2011 – 2031 (Pre-submission consultation)

Due to its draft status this Plan currently carries only a moderate amount of weight and little weight in relation to policies where there are outstanding objections.

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| SD SP1 – | 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. |
| 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.

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 (This is contrary to the more flexible approach in the NPPF). Or

As part of a farm diversification plan and the scheme will

- Benefit the local economy
- Where possible use an existing building
- Any new buildings are appropriately designed
- New buildings are sited adjacent to existing buildings
- The scheme will not harm the character or appearance of the countryside
- The scheme will not affect the character or safety of rural roads.

Skills SP1 – The Council will welcome developments which address:

- Address the barriers to employment for economically inactive people.

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.

Ford Parish Council Neighbourhood Plan 2017 – 2031 Submission plan May 2017 (NP)

Within the NP the application site and the existing depot fall within Strategic Area 1 (SA1). This area is allocated for future housing and other development, including employment floorspace.

Policy EE1 Supports development proposals to upgrade or extend existing employment sites and policy EE2 supports the retention of existing employment sites. Policy EE3 seeks to protect existing businesses and policy EE4 supports new commercial uses.

Policy EE7 requires new commercial development to include secure parking and storage for cycles and the use of energy efficiency measures. Policy EE10.1 requires new commercial buildings to be designed to a high quality and be energy efficient and in keeping with their surroundings.

Evaluation

Constraints

- Rural location (albeit within the NP Strategic development site)

Opportunities

- To improve and expand the workspace of two long established local businesses.
- To provide additional local employment.
- To provide direct and indirect employment during the construction of the development.
- To supplement the Farm income

Location/Accessibility

The site is ideally located to meet the needs of a highways depot which serves the A27 to the north. This location obviates the need for any commercial traffic generated by the depot to travel through any settlements in Arun District. Its close proximity to the A27 minimises the length of travel and associated pollution and congestion.

The site is similarly ideally located for Bleach of Lavant, who require easy access to the A27 and the A29 beyond for the same reasons. By locating their maintenance department and facilities on the same site will obviate the need to move HGV's and vans between two separate sites.

Whilst the site is not located close to bus stops, it is within cycling distance of local settlements and the by nature the businesses are directly associated with road travel.

Amount

The proposed office building, salt storage building and outside storage area have been specifically designed to meet the precise accommodation requirements of the Highways Agencies contractors.

The office building would comprise three offices, a meeting/tea room and w.c/shower and would have a gross external floor area of 96m². The salt storage building would have a gross external floor area of 144m².

The overall site, including the access extends to 9122m². The site itself, excluding the existing access extends to 6286m².

Appearance and scale

The salt building would have the appearance of a typical modern open fronted agricultural barn. It would have a grey plastic coated steel sheet roof and green plastic coated steel profiled walls on three sides. It would have no doors or windows.

This building would be located at the southern end of the site where it would be screened to the south by an existing screen hedge and to the north/east by the existing Depot and yard. From the west it would be seen within and against the backcloth of the existing depot. And haulage site.

The office building would have a floor area of just 96m² and would have a fully hipped roof to minimise its size and scale. This building would similarly be clad in plastic steel sheeting

which will be in contrasting light grey and light green colours. It would be located top the northeast of the proposed salt barn where it would be screened in the same way as the salt building.

Dark Skies and Lighting

The salt barn will have no windows or doors and the proposed office is both modest in form and size and will have no rooflights. Typically, the office will be fully occupied during normal office hours and would have skeleton staff at night.

Access

Access to the site will be via the existing depot access. This is a wide access suitable for large vehicles and already serves the depot, haulage yard and the application site which is sued for grain storage. (With the proposal the grain storage will cease).

Parking

The proposal includes 8 car parking spaces, including one disabled space. It also includes parking for 4 HGV's.

Traffic

Currently the highways depot employs 6 staff and this will not change with the proposal. Currently some of the staff car share, although none cycle. The proposed cycle facilities may help encourage cycling to work.

During their working day the staff are out on the A27 responding to accidents, gritting, etc , for which they use a variety of vans trucks and lorries. The number of work vehicles will not increase as a result of the proposal. The number of vehicle trips varies according to need, although up to 12 staff movements per day can be assumed, plus work orientated trips out.

Bleach of Lavant have an operators license for 55 lorries and this will not change as a result of the proposal. The trips iundertaken can take a day or several days depending on the delivery location. In addition, at all times some of the lorries are at the maintenance yard in Chichester for servicing and repairs. With the proposal the number of lorries and deliveries will not change. However, all servicing and maintenance will take place on site which will obviate the need for any movements between Ford and Chichester. This could result in up to 20 two way traffic movements per week.

Bleach of Lavant employ 26 staff on site and with the proposal this will increase by 6. In theory this would increase traffic movements by up to 6 two way movements per day. However, current staff already travel between the two sites and so this will cease. Thus, realistically the number of additional two way car movements to and from the site would be less. Also by having more staff at one site will increase the scope for car sharing. Currently staff share lifts according to their daily timetable, etc.

Currently the application site is used for grain storage. Up to 6000 tons are stored on the site each season. It is delivered to the site by tractors with 10 tonne loads each and carted away to customers in lorries which can hold 25 tonnes. This equates to some 1,680 vehicle movements, of which 1200 take place over a 8 week period in the spring/summer. With the proposal all of these vehicles movements to the site will cease.

Overall, the number of traffic movements to and from the site will likely reduce and at worst would remain unchanged. More importantly, the number of heavy vehicle movements would materially reduce with no maize movements and no trips to and from the maintenance yard in Chichester.

Noise Impact

The proposed scheme will be very little different to the existing activities on the depot site. In addition, the site is not located close to any dwellings. Whilst the haulage activities will increase, the need to transport HGV's to and from the existing maintenance dept will cease. In addition, the use of the access for bringing grain in and out will cease. Overall the level of noise and activity will reduce.

Contamination

The site has been used to store crops and so should not be subject to any contamination.

Flood Risk Assessment

The site is not classed as being located in an area at risk of flooding and the proposal should not increase the risk of flooding in the area.

Refuse and Waste

Provision will be made on site for the storage of refuse and recycling waste, immediately to the side of the proposed office building. Cycles would be stored in a similar location. It should be noted that refuse etc will be removed from the site by private contractors.

Landscaping

In addition to the existing hedges a new traditional rural hedge would be planted along the western boundary of the site. This will include Blackthorn, Hawthorn and Field Maple whips (60-80cm tall) planted at 30cm intervals in a double row.

Biodiversity & Ecology

There are no trees nor soft landscape or hedgerows that will be affected by the proposal. The site itself is mainly hard surfaced and used for storage, parking and access.

The proposed new hedge will enhance biodiversity and the ecological value of the site.

Sustainability Assessment

Economic factors

Currently the site is about to become redundant for farming purposes and is already used for commercial access and parking. It is available for commercial use and to leave it unused would be a waste of a valuable resource.

The proposed scheme would provide additional employment in an area where a significant amount of new housebuilding is proposed. The development would represent an investment for the agricultural holding, that could be borrowed against for farm funding as required.

The proposal will meet the needs of two important local companies, helping to secure their long term viability and profitability.

The rental income from the proposed development would supplement the agricultural holding's income in the long term.

Having regard to the location of the site and the nature of the highways and haulage uses it will benefit road safety and the local horticultural industry, as well as the local and rural economy.

Thus, the proposal would make a significant contribution to the local and rural economy, as specifically encouraged by the NPPF.

Social factors

The proposal would meet the needs of two important local businesses that employ a considerable number of local people. The staff support local services and facilities and aid local businesses through their work.

Despite the expected growth in population few measures have been put in place to increase employment opportunities and employment floor space in the locality.

Environmental factors

The site is ideally located in relation to the main road network and in particular the A27. It is within easy cycling distance of a large workforce and will not result in heavy traffic within local towns and villages.

The site is already partially hard surfaced and used for access and open storage and was previously part of the former airfield runway.

The site is located within easy cycling distance of a range of community facilities.

Sustainability Conclusion

The scheme readily complies with the economic, social and environmental roles of sustainable development as set out in the NPPF and the emerging Local Plan. It readily complies with the objectives of the environmental and economic policies set out in the adopted and emerging local plans. Any conflict with the 2003 Local Plan and the emerging Local Plan would be materially outweighed by the significant benefits that would result from the scheme.

Chartered Town Planner
