

PLANNING APPLICATION FOR NEW INDUSTRIAL UNIT (USE CLASS B2/B8)

PLANNING STATEMENT

RIVERSIDE INDUSTRIAL ESTATE, LITTLEHAMPTON

ON BEHALF OF L&C COMMERCIAL LIMITED



Pegasus Group

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the written consent of Pegasus Planning Group Limited

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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by Pegasus Group on behalf of the Applicant, L&C Commercial Limited, in support of a Full Planning Application for the erection of a new industrial unit (Use Class B2/B8) along with associated parking and landscaping at Riverside Industrial Estate, Littlehampton.
- 1.2 This Statement sets out the planning rationale behind the proposed development and seeks to demonstrate its acceptability in planning terms.
- 1.3 The remaining sections of the Statement are structured as follows:
- **Section 2** describes the site, the surrounding context and any relevant background information including any planning history;
 - **Section 3** describes the proposed development;
 - **Section 4** reviews the planning policy context;
 - **Section 5** assesses the proposals against relevant planning considerations;
 - **Section 6** assesses the proposals contribution to sustainable development; and
 - **Section 7** brings the report together to a conclusion.

2.0 SITE AND SURROUNDINGS

The Site

- 2.1 The application site is located on the northern-most edge of the Riverside Industrial Estate in Littlehampton, West Sussex. The site is within the administrative area of Arun District Council.
- 2.2 The extent of the application site is identified by a 'red line boundary' on the submitted Site Location Plan, an extract of which is shown below. The total application site area is 0.23ha. Land adjacent to the site that is also within the applicant's ownership is identified by a 'blue line boundary'.

Figure 1: Insert Site Location Plan extract

- 2.3 The site comprises previously developed (brownfield) land within the existing extent of the Industrial Estate and is currently occupied by a car park serving as casual unallocated parking for adjacent industrial units (46 spaces).
- 2.4 The site is bound by existing Industrial Units to the east and south and by existing trees and vegetation and the Wick Farm Ditch (a part open part closed culvert) which runs along the site's north and west boundaries. Bridge Road (B2187) and the Bridge Road Roundabout are situated beyond to the north and east of the site.

Site context

- 2.5 Littlehampton is one of the two main towns in Arun District, located at the mouth of the River Arun (with the other being Bognor Regis). Riverside Industrial Estate is well-established, containing around 50 units in mixed B2, B8 and Class E business use. They are typical industrial units of between 2-3 storeys in height, with a mix of brick and cladding. Access into the site by vehicles, pedestrians and cyclists is available from Bridge Road.

- 2.6 The site and the Industrial Estate is located within a wider commercial and employment area of Littlehampton. Further industrial estates are located to the east and north across the railway line and railway yard, and a retail park is located to the north.
- 2.7 The application site is located to the west of Littlehampton town centre, approximately 860m north-west of Littlehampton Train Station. The station is well served by regular services towards Brighton, Bognor Regis and London (Victoria). Bus stops are located on Bridge Road (B2187) approximately 250m east of the site. The bus stops are served by regular services travelling towards Littlehampton town centre and Chichester, with less regular services towards Sefton Bottom and Wick. The site is also in close proximity to the A27 which provides good links to the wider strategic highway network.

Planning History

- 2.8 A search of the LPA's online planning records did not return any previous planning applications for the site.

3.0 PROPOSED DEVELOPMENT

Description of Development

3.1 Approval is sought for the following:

"Full planning application for the erection of one industrial unit (Use Class B2/B8) and associated parking and landscaping."

3.2 The following summarises the proposed scheme, the accompanying Design & Access Statement should be referred to for further full details.

3.3 The proposal would create 528 sqm of new industrial floorspace, contained within a single unit. 10% of the new floorspace will be within a mezzanine level. The majority of the floorspace would be for flexible industrial use (B2) / storage and distribution use (B8), with some ancillary office space. The unit will also accommodate an accessible W.C.

3.4 The siting of the new unit has been informed by two main factors, ensuring a continuation of the existing frontage formed by the unit to the east, and the existing culvert on the north and west of the site. The scale of the proposed unit has been designed to be in keeping with the existing units, following a similar pitched roof line to the adjacent unit.

3.5 The submitted elevations and 3-D views should be referred to for design details of the unit. A glass curtain wall is proposed on the front elevation, which will serve dual purposes of being a point of interest and allowing light into the unit. The overhanging frame feature and signage will also help create a focal front elevation. A smaller glass wall is located on the west elevation, with further roof lights across the roof. Overall, it will be a modern industrial design while being complementary of the existing character of the industrial estate. The scheme will utilise mid grey corrugated aluminium sheets and dark grey cladding on the elevations, and matching mid grey corrugated aluminium roofing sheets.

- 3.6 The access for the proposed unit will utilise the already existing access, which is accessed via the junction into the Industrial Estate from Bridge Road and then along the internal roads within the estate leading to the site. The access and internal roads are suitable for the proposed use, being already in use by traffic for the existing industrial uses. A service entrance is proposed on the front elevation for standard deliveries, which will be a mid-grey service door with small windows. A parking / drop off area for goods vehicles is designated at the front of the unit.
- 3.7 In terms of parking for the proposed unit, parking spaces are proposed to serve the proposed new unit and existing units adjacent to the site. 5 parking spaces are allocated for use by the new unit, of which one will be a disabled-access parking space. A further 20 parking spaces will be unallocated, available for use by the adjacent industrial units. 1 of the parking spaces will be provided with the necessary infrastructure to allow future installation of an electric vehicle charging point.
- 3.8 In terms of landscaping, there is existing landscaping outside of the north-western boundary of the site, comprised of trees as indicated on the submitted Tree Constraints Plan. These trees will not be affected by the proposed scheme, and their retention will help screen the new unit from Bridge Road.

4.0 POLICY FRAMEWORK

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the Development Plan unless material considerations indicate otherwise. The relevant planning policies for this application are contained within the following documents:

- National Planning Policy Framework (NPPF, 2019);
- The Arun Local Plan 2011-2031 (ALP, July 2018) and Policy Proposals Map;
- Arun Parking Standards SPD (January 2020); and
- Littlehampton Neighbourhood Development Plan (LNP, October 2014).

Policy Designations

4.2 According to the adopted Arun Local Plan and Proposals Map, the site is located within the Built-Up Area Boundary and within the Employment & Enterprise, Economic Growth Area – see Figure 2 below. The site falls within the area of the Littlehampton Neighbourhood Plan but is not subject to any designations, see Figure 3 below. The red star indicates the site location in both extracts.

4.3 The application site falls within Flood Zone 3 according to the Environment Agency Flood Map. It is noted that employment/industrial uses are defined as a 'less vulnerable' land use in flood risk terms and are therefore still considered to be 'appropriate' in Flood Zone 3, subject to suitable mitigation measures. These measures are set out in the Flood Risk Assessment and Drainage Strategy submitted in support of the planning application.

4.4 The application is not subject to any statutory or local environmental, landscape or heritage designations.

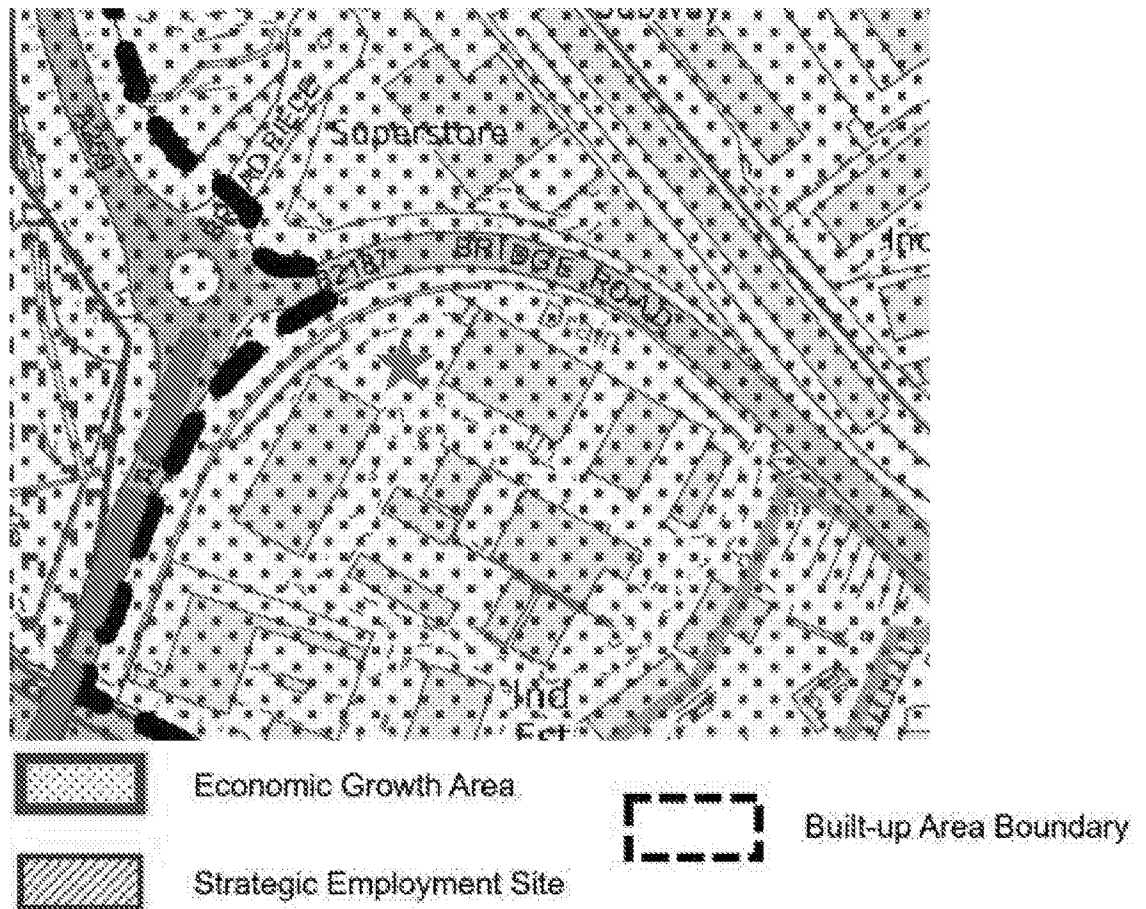


Figure 2: Extract from Arun Local Plan Proposals Map

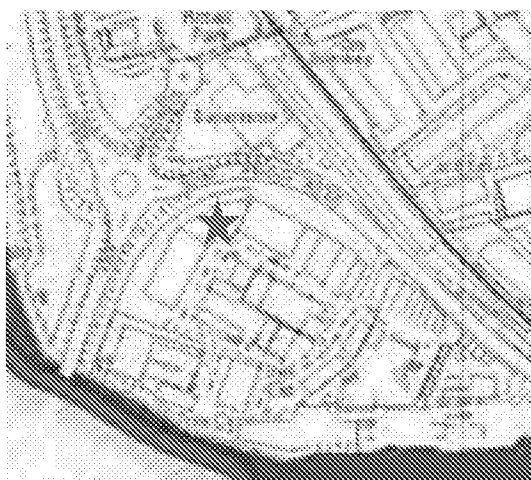


Figure 3: Extract from Littlehampton Neighbourhood Plan Proposals Map

5.0 PLANNING ASSESSMENT

5.1 This section assesses the proposed development against the relevant planning considerations set out in the adopted Development Plan and other material planning guidance documents as highlighted in Section 4 above.

5.2 Accordingly, the following key planning considerations are assessed in turn:

- Principle matters:
 - Principle of Development; and
 - Design
- Technical Considerations:
 - Access and Car Parking;
 - Trees and Biodiversity;
 - Flood Risk and Sustainable Drainage Strategy; and
 - Contamination.

5.3 Following an assessment of the above key planning considerations, the report then draws together the proposal's contribution towards the achievement of sustainable development as required by the NPPF.

Principle of Development

5.4 The presumption in favour of sustainable development is at the heart of the NPPF, and requires the approval of proposals that accord with an up-to-date development plan without delay (paragraph 11). This presumption in favour is carried through into the Local Plan (Policy SD SP1).

5.5 As the site is located within the built up area boundary of Littlehampton, initial support for the application by Policy C SP1 of the ALP which states that such development sites will be permitted, subject to consideration against other local planning policies. Policy 2 of the LNP also seeks to concentrate future development, including economic, within the built up area of Littlehampton. The site's location is also close to existing public transport links (bus and train),

which will encourage trips to the site via sustainable transport modes.

- 5.6 Further support for the application is provided by local and national policies which provide clear weight to the positive benefits of developing previously developed land. Policy SD SP1a(g) encourages the effective use of previously developed land as a strategic policy, provided the site is not of high environmental value. The application site is currently a car park of limited environmental value, as demonstrated by the submitted biodiversity checklist. NPPF paragraph 118(c) states decisions should 'give substantial weight to the value of using suitable brownfield land.'
- 5.7 Accordingly, there is clear strategic policy support for the development of a brownfield site located within the settlement boundary.
- 5.8 Turning now therefore to the specific use of the site for an employment use. This application will not affect the operation or viability of existing employment uses. There is therefore no conflict with Policy EMP SP1(c) of the ALP.
- 5.9 As illustrated in the previous section, the site is located within the Littlehampton Economic Growth Area. Policy EMP SP2 of the ALP is therefore applicable, which seeks to enhance local employment opportunities within the defined areas. As will be discussed later in this section, the application scheme will have no adverse impact in terms of flood risk, contamination or access issues. The application will also have no impact on the Harbour. There is therefore no conflict with Policy EMP SP2.
- 5.10 Policy EMP DM1 of the ALP relates specifically to proposals for the development of employment land. The policy provides support for the application – section 1.a. states appropriate proposals for development of employment floorspace to upgrade existing employment areas will be supported. The current use of the site wholly as a car park is an under-utilisation of a well-placed site within an established industrial estate. It is therefore appropriate to make effective use of the site to provide additional employment floorspace.

- 5.11 Policy EMP DM1 of the ALP, section 2, requires the protection of existing employment sites. The re-development of the application site will not directly affect any existing employment uses. The existing car park is partly utilised on an ad hoc basis as unallocated, overflow car parking by the adjacent industrial units. As will be discussed in further detail later in this section, the application scheme will provide sufficient car parking to both meet the needs of the new unit as well as the current car parking needs. There will therefore be no direct or indirect impact on existing employment uses.
- 5.12 At the national level, NPPF paragraph 80 states planning decisions should help create the conditions in which businesses can invest, expand and adapt and 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.
- 5.13 Having regard to all of the above. It is clear that, as a starting point, the redevelopment of the application site is firmly established and the principle is supported by planning policy at all levels.

Design

- 5.14 The design details of this scheme have been discussed in the preceding section 4, and the submitted drawings pack and Design and Access Statement should also be referred to. At the national level, Chapter 12 of the NPPF sets out the importance of good design, with the specific aspects that new development should achieve being set out at paragraph 127. NPPF paragraph 131 confirms that LPA's should accord great weight to innovative designs that help raise the standard of design more generally in an area.
- 5.15 In accordance with local Policy D SP1 of the ALP, the proposal has been designed to make effective use of the land while reflecting the characteristics of the area and accommodating the site specific constraints, which includes the existing culvert and providing sufficient levels of parking.

5.16 Policy D DM1 of the ALP provides the requirements for specific aspects of form and design quality that should be met by new developments. The aspects relevant to this application are discussed in turn below:

Character

- The new industrial unit has been designed as a reflection and enhancement of the existing industrial character of the site. Positive design cues have been taken from adjacent units in terms of layout, scale and materials – with enhancements in the form of design features that emphasise the unit as being a modern and unique addition to the estate.

Appearance/attractiveness

- A high standard of architectural principles have been demonstrated in accordance with the policy, with the creation of an attractive unit that utilises materials that are reflective of the local character.

Impact

- The new industrial unit will have no impact on nearby property. The site is located on an industrial estate where all adjacent units are in industrial or commercial use.

Innovation

- The new industrial unit reflects the existing units in terms of scale and building materials. Improvements are made by incorporating unique design features, particularly on the front elevation, that modernise the look of the unit. This includes the use of a glass curtain wall, overhanging frame feature with identity cladding to the underside, and a matching horizontal signage panel.

Adaptability

- The industrial unit includes a disabled access toilet and welfare area, as well as a disabled access parking space. The industrial unit is essentially a large open internal space, adaptable to the needs of any commercial occupier and their employees.

Crime Prevention

- The new unit is located within an established industrial estate. The ancillary office, located on the mezzanine level, will overlook the car parking, thereby providing further security.

Trees and woodland

- The proposed unit will safeguard existing trees of high value. The design of the proposal has had regard of a tree survey and Arboricultural Implications Report.

Scale

- The proposed industrial unit has been designed to be in keeping with the existing scale, with a roof ridge line that is similar to the neighbouring existing unit.

5.17 Policy 22 of the LNP encourages major planning applications to be considered by a Littlehampton Design Assessment Panel. As the proposal will create 528sqm of floorspace, the proposal falls below the threshold of major developments at 1,000 sqm floorspace and Policy 22 therefore does not apply.

5.18 Accordingly, having had regard to the above and relevant submitted material, the proposed scheme successfully integrates within the approved context of the site, in accordance with national and local planning policy requirements.

Technical Considerations

Access and Parking

5.19 At the national level, NPPF paragraph 106 requires LPA's to ensure parking is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists. NPPF paragraph 111 also requires developments anticipated to generate additional movement to be supported by a Travel Plan and Transport Assessment so that the likely impacts of such development can be reasonably assessed.

- 5.20 At the local level, Policy T SP1 Transport and Development of the ALP sets out criteria to ensure safe access and the promotion of sustainable transport. The proposal is considered to comply with Policy T SP1 through the following.
- 5.21 Access to the site from the highway network will be via the existing priority junction which provides access from Bridge Road into Riverside Industrial Estate. This junction will not require any improvements to accommodate the additional traffic generated by the new industrial unit. Pedestrian access is available via the same entrance, with footpaths on Bridge Road linking the site to the town centre and other nearby services. This includes bus stops which are located on Bridge Road, around 70m south of the access, as well Littlehampton train station which is 15 minutes' walk from the site.
- 5.22 The submitted Transport Statement has assessed the traffic implications of the proposed industrial unit, on the basis that the unit will be either B2 or B8. The traffic generation of these uses is considered to be relatively low and in keeping with the existing traffic movements associated with the industrial estate. The proposal will therefore have no adverse transport impacts.
- 5.23 The site is currently utilised as 'casual' unallocated car parking of 46 spaces by workers or visitors to other units in the industrial estate. As discussed in the Transport Statement, the car parking is currently under-utilised with around half of the car parking spaces being filled at the most. Furthermore, the car parking spaces located on the frontage of adjacent units are also half empty. This indicates the current car parking on the site is not fully required by existing units, and the proposed provision of 20 unallocated spaces will be sufficient to meet any needs when the existing parking spaces associated with other units are also taken into account.
- 5.24 The Arun District Council Parking Standards SPD has been regarded during the design of this scheme, being the most up to date parking standards. There will be 25 car parking spaces, which will include 5 allocated car parking spaces (including 1 disabled space), 1 parking space for goods vehicles and 4 free standing cycle stands able to accommodate 8 cycles. A further 20 unallocated car parking spaces will also be provided. This equates to a total of 25 car

parking spaces, which is a loss of 21 spaces from the existing provision of 46 spaces.

5.25 The Parking Standards SPD requires higher levels of car parking provision for B2 uses, at 1 space per 40sq/m. Applying those standards, the scheme needs to provide 13 car parking spaces which is clearly complied with. The applicant considers that 5 car parking spaces will be sufficient to serve the number of new employees likely to be working in the unit. The sustainable location of the site means all new employees are unlikely to travel by car. As such, 8 cycle spaces are provided which is an over-provision on the 4 spaces required by the Parking Standards.

5.26 The proposal therefore accords with Policy T SP1 and Policy T DM1, which requires easy access to public transport services, and provision of cycling and pedestrian facilities in accordance with SPD.

Trees and Biodiversity

5.27 In accordance with Policy ENV DM4 of the ALP, a tree schedule and tree constraints plan has been produced and is submitted with this application illustrating the existing trees that are adjacent north and west of the site. The Arboricultural Implications Report also submitted demonstrates that the proposed development works would not have a negative impact on existing trees of high landscape or biodiversity value, or on their root systems. Trees that are subject to a TPO will be retained. The individual trees that are proposed for removal would not have an adverse impact on the arboricultural character and appearance of the local landscape.

5.28 An ecological appraisal of the site has been conducted to determine the site's biodiversity value. The site is of limited ecological interest, due to the current use as a car park with hard-standing. The existing vegetation on the northern and western boundaries of the site were however considered to have the potential for biodiversity value, and was thus appraised in greater detail.

- 5.29 In accordance with Policy ENV DM5 of the ALP, this application includes ecology surveys of those species which the preliminary ecology appraisal considered may be present in proximity to the site. The surveys found that the site has a low level of protected species. No bat roosts were identified and low-level foraging was recorded by two species of bat. No common reptiles were found at the site. Common breeding birds were recorded in trees on the site but the adjacent industrial unit, which lies in close proximity to the proposals, was found to support breeding Herring Gulls, a Red List Bird of Conservation Concern. Mitigation is therefore recommended to avoid disturbing breeding birds on and adjacent to the site by not commencing construction during the bird breeding season (March – August).
- 5.30 Further ecological enhancements can be introduced into the scheme through the provision of bird and bat boxes installed within the trees in the vegetated boundary of the site and which fall within the Applicant's wider ownership.

Flood Risk and Drainage Strategy

- 5.31 The Application site is located within Flood Zone 3 according to the EA online flood mapping. However, when the presence of flood defences are taken into account, the site is considered to be at low risk of flooding. In any event, the proposed development is for an industrial use which is considered to be a 'less vulnerable' use and therefore appropriate for Flood Zone 3.
- 5.32 The submitted Flood Risk Assessment considers the risk of fluvial flooding to be low and the risk of tidal flooding (from the River Arun) to be low to moderate. The site is not predicted to be affected by tidal flooding within the lifetime of the development (60 years). As a result, it is not considered necessary to incorporate mitigation measures.
- 5.33 In terms of surface water drainage, the application site is occupied by an existing car park, formed of impermeable hard-standing. The proposed development will reduce the overall impermeable area and therefore reduce the surface water flows generated by the development. As explained in the submitted Surface Water Drainage Strategy, the proposed development will

ensure significantly reduced offsite flow rates compared to the existing offsite flow rates. The most appropriate strategy has been assessed to be for the surface water to be collected via high capacity channel drains and rainwater pipes and temporarily stored in a below ground attenuation tank before discharge to the existing surface water drain to the south-west of the proposed unit. The foul water drainage will be connected via an existing manhole.

- 5.34 The proposed development therefore accords with Policy W DM2 in terms of flood risk and Policy W DM3 in terms of surface water drainage strategy.

Contamination

- 5.35 A Preliminary Risk Assessment has been conducted of the site to assess whether the area is potentially contaminated. The assessment recommends further investigation to assess potential soil and groundwater contamination and the possible need for remediation, as well as the need for piled foundations arising from geotechnical considerations. The report also recommends gas monitoring.
- 5.36 The risk assessment has been conducted in accordance with Policy QE DM4 of the ALP, and the recommended further investigations will also be conducted in accordance with policy.

Refuse Provision

- 5.37 As indicated on the Proposed Site Plan, there is sufficient space at the front and rear of the building for waste receptacles (general waste and recycling). The Swept Path Analysis undertaken as part of the Transport Assessment demonstrates that a refuse vehicle would be able to safely access the goods service yard to collect waste as required.

6.0 CONTRIBUTION TO SUSTAINABLE DEVELOPMENT

- 6.1 The NPPF sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is the framework beneath which the Local Development Plan sits and identifies the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7). As such, the planning system has three overarching objectives, set out at paragraph 8: economic, social and environmental. As mentioned in preceding section 5, the NPPF sets out a presumption in favour of sustainable development at paragraph 11 which, for decision-making, means that development found to be sustainable should be approved without delay.
- 6.2 The following section therefore considers the proposal's contribution to the three overarching objectives of sustainable development and assesses whether the presumption in favour of sustainable development should apply in determining the planning application.
- 6.3 The proposed development contributes strongly towards the economic objective of sustainable development. A new employment use will be provided within a well-established employment area of Littlehampton, contributing further towards the economic vitality of the region. The Economic Benefits Statement submitted with the application sets out the economic benefits associated with the scheme provision. This includes 8 jobs during the construction period and up to 11 jobs during the operational period. The scheme would also allow the generation of substantial additional gross value added to the regional economy during the construction and operational periods.
- 6.4 The application proposal performs a social objective in that it is a well-designed building that ensures the safety of employees and visitors. The proposal is located in a sustainable location, able to be accessed by a variety of sustainable and public transport modes.
- 6.5 In environmental terms, the preceding section 5 has clearly set out the

acceptability of the scheme in terms of technical considerations. This includes protecting biodiversity, and ensuring the proposal is not at risk of contamination or flood risk. The application also meets the NPPF environmental objective by making effective use of previously developed land, in line with NPPF paragraph 118.

Summary

- 6.6 This section has demonstrated that the proposed development comprises a development that constitutes sustainable development consistent with the guiding principles of the NPPF.
- 6.7 Accordingly, it is appropriate to apply the presumption in favour of sustainable development for decision-making and approve the proposed development without delay, in accordance with paragraph 11(d).

7.0 CONCLUSION

- 7.1 This Planning Statement has been prepared in support of a Full Planning Application for the redevelopment of an existing car park to provide a new industrial unit with associated parking and landscaping.
- 7.2 This Statement sets out the planning rationale that underpins the proposed development and demonstrates its acceptability in planning terms. The proposal is well-designed, accords with the existing character and relates well to the adjacent uses.
- 7.3 The proposed development is demonstrated within this Statement to comply with the relevant national and local planning policies and other relevant material considerations and is therefore considered to represent sustainable development which should be approved without delay.