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**PLANNING STATEMENT:
INSTALLATION OF PLANT AND CANOPY
AND INTERNAL ACCESS ROAD
ALTERATIONS**

**LAND AT WATERSMEAD BUSINESS PARK,
NORWAY LANE, LITTLEHAMPTON**

Date: February 2019

Ref: SP/AOL



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Revision	Description	Originated	Checked	Reviewed	Authorised	Date
Draft	Planning Statement	AOL	SP	SP	SP	04/02/2019
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1.0 INTRODUCTION

1.1 This Planning Statement has been prepared on behalf of Amazon UK Services Ltd ('Amazon'), the applicant, in support of an application for full planning permission for a proposed development at Watersmead Business Park, Norway Lane, Littlehampton (the 'Site').

1.2 The application relates to the installation of 5no. 'Vehicle-to-Ground' (V2G) lifts and a covering canopy within the associated service yard area between Units 5 and 6 for a temporary period of five years. The proposals also include alterations to the internal access road, required to enable safe vehicular access around the Site, with associated lighting and drainage provision. The full description of the proposed development is:

"Installation of 5 no. 'vehicle-to-ground' lifts, HVAC plant units, and a canopy cover over the associated service yard area for a temporary period of five years. Installation of 3 no. level access doors, minor alterations to the internal access road, including widening works, creation of a new spur, provision of a pedestrian footbridge, and associated lighting and drainage infrastructure provision."

1.3 This Planning Statement outlines the need for the proposed development, and demonstrates that the proposals represent sustainable development that complies with planning policies at all levels that seek to deliver economic growth, deliver sustainable transport, and conserve and enhance the natural environment.

1.4 The application is supported by the following technical reports that should be read in conjunction with this Planning Statement:

- Validation Checklist, completed by DWD;
- Design and Access Statement, prepared by SMR Architects;
- Planning Statement, prepared by DWD;
- Preliminary Ecologic Appraisal, prepared by Delta-Simons Environmental Consultants;
- Arboricultural Survey Report, prepared by Delta-Simons Environmental Consultants; and,
- Flood Risk and Drainage Assessment, prepared by Pinnacle Consulting Engineers.

1.5 In addition, the following detailed architectural drawings have been prepared by SMR Architects, and are submitted with the application to illustrate the proposed scheme.

Table 1.1 – Application Drawings

DRAWING NO.	DRAWING TITLE
7260-SMR-00-ZZ-DR-A-1001-S3-P2	Site Location Plan
7260-SMR-00-ZZ-DR-A-2001-S3-P3	Proposed Site Block Plan
7260-SMR-00-ZZ-DR-A-2004-S3-P1	Existing Building Elevations
7260-SMR-00-ZZ-DR-A-2005-S3-P1	Proposed Building Elevations
7260-SMR-00-ZZ-DR-A-2006-S3-P1	Existing Floorplans
7260-SMR-00-ZZ-DR-A-2007-S3-P1	Proposed Floorplans
7260-SMR-00-ZZ-DR-A-2008-S3 P1	Existing and Proposed Roof Plan
R3088-05-RMS-XX-0-DR-E-2300 A	External Lighting

1.6 The remainder of this Statement is set out as follows:

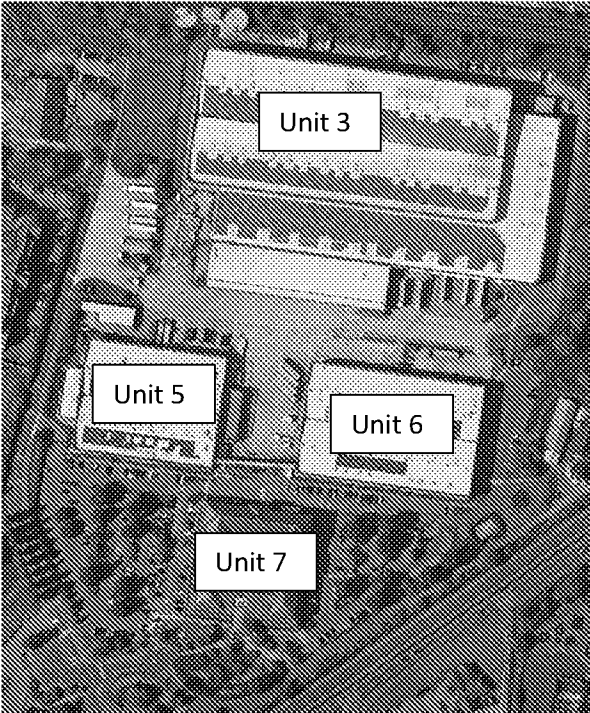
- Section 2 describes the site and the surrounding area;
- Section 3 sets out the proposals for the site that are the subject of this planning application;
- Section 4 assesses the proposed development against the relevant national and local planning policies and other material considerations; and,
- Section 5 sets out our overall conclusions on the planning merits of the proposals.

2.0 SITE LOCATION AND DESCRIPTION

Site Location and Description

- 2.1 The Site comprises land within the service yard at Watersmead Business Park and the internal access road into the business park from Norway Lane, covering an area of approximately 2.76 hectares.
- 2.2 Watersmead Business Park, which dates from the early 1990s, is located to the north west of the A259, north of “The Body Shop Roundabout”, and south of the West Coast railway line. Other commercial/ industrial uses are located to the north, south east and south west of the business park. A site location plan is submitted as part of this application.
- 2.3 The business park comprises 3 warehouse units numbered 3, 5 and 6, and a headquarters office building numbered building 7 (see Figure 2.1 below). These units are served by an internal access road that links to Norway Lane at the western end of the site, runs along the western, northern and eastern perimeter and joins the service yard at its eastern end between Unit 3 and Units 5 and 6.
- 2.4 The service yard that serves the business park units lies in the approximate centre of the site, to the south of Unit 3 and between Units 5 and 6. The units are also served by a car park at the southern end of the site, which is shared between Amazon and Body Shop.
- 2.5 The Site is not within a designated conservation area and the buildings are not listed. The Site is within Flood Zone 1, and is therefore in an area with a low probability of flooding.

Figure 2.1 – Watersmead Business Park Aerial View



3.0 PROPOSED DEVELOPMENT AND KEY PLANNING CONSIDERATIONS

- 3.1 Amazon currently operates from Unit 5, Watersmead Business Park. It is proposed to install 5 no. 'Vehicle to Ground' ('V2G') lifts within the service area between Units 5 to 6, which will allow parcels to be unloaded from HGVs without the need for separate forklift trucks. The unloading process from the V2Gs needs to be undertaken in a protected environment and, therefore, a covered canopy between the units is proposed.
- 3.2 The V2G lifts and the covered canopy are required for a temporary period of five years only.
- 3.3 The creation of a new section of internal access road at the eastern end of the service yard is required to separate Body Shop's and Amazon's vehicle movements. The access road spur would comprise replacing a small area of landscaping with a new road surface with a tarmac finish.
- 3.4 Pedestrian access across this part of the service yard is proposed to be improved by the provision of an elevated footbridge. This would allow for uninterrupted HGV access to the service yard and safe pedestrian access, with vehicles passing underneath.
- 3.5 The section of internal access road at the northern end of the Site is to be widened to accommodate a van staging area to the north of Unit 3. The radii of internal access road corners also need to be redefined to ensure safe manoeuvring of vehicles around the Site.
- 3.6 New pole mounted lighting along the access road is proposed to ensure a safe working environment.
- 3.7 One glazing area on the northern elevation of Unit 5 and 2 glazing areas on the northern elevation of Unit 6 are to be replaced with level access doors.
- 3.8 The new access road spur and widened access road would be accompanied by associated drainage works to ensure that surface water on to the new areas of hardstanding would be drained appropriately.
- 3.9 The proposed new access road spur, the elevated footbridge, the internal access road alterations, the level access doors, lighting and drainage infrastructure would be permanent changes to the site. These would serve to enhance safe manoeuvring of vehicles around the site, to the benefit of all business park occupiers.
- 3.10 In summary, the proposals comprise:



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- Temporary works (required for a period of 5 years) – Installation of 5 no. ‘vehicle-to-ground’ lifts, HVAC plant units, and a canopy cover over the associated service yard area; and,
 - Permanent works – Minor alterations to the internal access road, including widening works, creation of a new spur, provision of a pedestrian footbridge, and associated lighting and drainage infrastructure provision.

4.0 PLANNING POLICY CONSIDERATIONS

- 4.1 This section sets out the national and local planning policies relevant to the proposals that seek to achieve sustainable development, build a strong, competitive economy, achieve good design, conserve and enhance the natural environment, promote safe and sustainable transport, and meet the challenge of climate change and flooding.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, if regard is to be had to the development plan for the purpose of determining planning applications, then determination must be made in accordance with the development plan, unless material considerations indicate otherwise.
- 4.3 The statutory development plan for the area for the purpose of this application comprises the Arun Local Plan (2018). Material considerations of relevance to the application include the updated National Planning Policy Framework (NPPF) published in 2018.

Achieving Sustainable Development

National Planning Policy Framework

- 4.4 The NPPF sets out the Government's planning policies for England and how they should be applied. It specifies that the purpose of the planning system is to contribute to the achievement of sustainable development through 3 overarching objectives, which should be delivered through the preparation and implementation of plans and the application of the NPPF policies:
- An economic role – to ensure a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places to support growth, innovation and improved productivity;
 - A social role – to support strong, vibrant and healthy communities by fostering a well-designed and safe built environment; and,
 - An environmental role – making effective use of land and contributing to protecting and enhancing the natural, built and historic environment (paragraph 8).
- 4.5 At the heart of the NPPF is a presumption in favour of sustainable development, which should be applied by approving development proposals that accord with an up-to-date development plan without delay (paragraph 11c).
- 4.6 Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless there is a clear reason for refusing the proposal (based on NPPF policies that protect areas of assets of

particular importance), or any adverse impacts of doing so would significantly or demonstrably outweigh the benefits, when assessed against the NPPF taken as a whole (paragraph 11d).

Arun Local Plan (2018)

- 4.7 Policy SD SP1 states that the Council will take a positive approach to considering development proposals that reflect the presumption in favour of sustainable development contained in the NPPF. It will work proactively with applicants to jointly find solutions which mean that proposals can be approved wherever possible and to secure development that will contribute to the social, economic and environmental conditions of the District.

Policy Compliance

- 4.8 The proposed scheme represents sustainable economic development on the basis that it constitutes more efficient use of existing employment land to enable a more efficient operation at the site.
- 4.9 The aspects of the proposed development that are required for a temporary period have been designed so that they can be put in place and removed easily, with no permanent alterations to the land or existing buildings.
- 4.10 The permanent, minor alterations to the internal access road, the creation of a new access road spur, and the associated lighting and drainage infrastructure provision are required to ensure safe and secure manoeuvring around the site, and will enhance the existing site for the benefit of all existing and future occupiers.
- 4.11 Overall, the proposals represent a contribution to achieving a well-designed and safe built environment that would support sustainable economic growth.
- 4.12 Sustainable development is achieved through the collaboration of a number of key requirements. As such, compliance with the above overarching policies requiring sustainable development is set out below.

Building a Strong, Competitive Economy

National Planning Policy Framework

- 4.13 The NPPF sets out the Government's commitment to creating the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account local business needs (paragraph 80).
- 4.14 Local planning authorities are required to make provision for storage and distribution operators at a variety of scales and in suitably accessible locations (paragraph 82).

Arun Local Plan (2018)

- 4.15 Policy GEN2 advises that development will be permitted within the built up area boundaries, subject to other Local Plan policies.
- 4.16 Policy EMP SP1 seeks to protect and enhance existing employment sites and premises to meet the needs of business. It also supports the provision of appropriately scaled development where such uses compliment [sic], and are compatible with, employment/ commercial uses.
- 4.17 Policy EMP DM1 states that the Council will seek to protect and enhance existing employment sites and premises. Appropriate proposals for upgrading or modernising existing premises will be supported.

Policy Compliance

- 4.18 The proposed development is required to improve the existing access arrangements and site safety, which should be afforded significant weight in accordance with national planning policy.
- 4.19 The site is within the defined built up area boundary, where development is considered appropriate. Watersmead Business Park (and consequently the Site) has been in employment use for almost 30 years, having been developed in the early 1990s. Therefore, the Site and its enhancement are supported by local and national planning policy.
- 4.20 The proposed temporary installation of V2G lifts and the associated canopy have been designed to complement the surrounding business park environment at a suitable scale in relation to the existing units that it will sit between. The temporary nature of the V2G lifts and the associated canopy would ensure that the Site could be reinstated to its current condition easily and efficiently.
- 4.21 The proposed alterations to the access arrangements are minor in scale and would not result in a significant change to the Site, but would enhance the Site's manoeuvrability for all vehicles accessing the business park.
- 4.22 In light of the above, the proposed development is compliant with national and local planning policy seeking to secure sustainable economic growth and enhanced productivity.

Promoting Healthy and Safe Communities

National Planning Policy Framework

- 4.23 In the interests of achieving healthy, inclusive and safe places, local planning authorities are required to promote layouts that allow for easy pedestrian connections, and are safe and accessible (paragraph 91).

Arun Local Plan (2018)

- 4.24 Policy T SP1 states that the Council will ensure that development provides safe access. Development that creates safe and secure layouts for traffic and pedestrians will be supported.
- 4.25 The supporting text for Policy D SP1 advises that one of the objectives of the policy is to create and promote opportunities for ease of movement for pedestrians, while ensuring road users are equally designed for (paragraph 13.1.4).

Policy Compliance

- 4.26 The proposed alterations to the internal access road are required to enhance vehicle manoeuvrability around the site, and to allow for an area of van staging on the site's northern edge.
- 4.27 The proposed lighting infrastructure provision along the access road would enhance the site's safety credentials by providing a more secure working environment for all occupiers of the business park.
- 4.28 Enhanced pedestrian access would be provided by the proposed elevated footbridge, which would allow for uninterrupted vehicular access to the service yard, without compromising pedestrian safety.
- 4.29 In light of the above considerations, the proposed development would result in a healthier and safer working environment for staff and visitors to the Site. Therefore, the proposals are compliant with national and local planning policy.

Promoting Sustainable Transport

National Planning Policy Framework (2018)

- 4.30 Paragraph 102 requires the environmental impacts of traffic and transport infrastructure to be identified, assessed and taken into account. In addition, it should be ensured that safe and suitable access can be achieved for all users (paragraph 108). Developments should create places that are safe, secure and attractive, and that minimise the scope for conflicts between pedestrians and vehicles (paragraph 110).

Arun Local Plan (2018)

- 4.31 Policy T SP1 states that the Council will support proposals that have been designed to accommodate the efficient delivery of goods and supplies and create safe and secure layouts for traffic, cyclists and pedestrians.

Policy Compliance

- 4.32 The proposed alterations to the internal access road have necessitated the loss of an area of landscaping on the site's northern edge, and also on the eastern end of the site. In order to assess any potential environmental impacts associated with the scheme, these areas have been assessed as part of an ecological assessment and arboricultural assessment, both of which are submitted in support of the planning application.
- 4.33 The ecological assessment concludes that the site has potential to support reptiles, nesting birds and hedgehogs. Recommendations for the proposed development include:
- undertaking clearance or management works to on-site trees outside of the main bird nesting season;
 - allowing access and egress for hedgehogs in all new fencing on the site; and,
 - undertaking vegetation clearance along the northern edge of the site outside the reptile hibernation period.
- 4.34 Similarly, the arboricultural assessment concludes that the majority of on-site trees fall within Category B. An exception is an Indian bean tree adjacent to the east boundary, which is a memorial tree and as such is placed in Category A. If retained, the on-site trees will require protection measures to ensure no impact occurs as a result of any development.
- 4.35 The proposed amendments to the internal access road would ensure that HGVs can manoeuvre safely and efficiently around the site.
- 4.36 The scope for conflicts between pedestrians and vehicles within the service yard area would be addressed by the proposed elevated pedestrian walkway, which would allow for vehicle and pedestrian movements to be separated. This would result in safer access arrangements within the service yard area, and an overall safer working environment for all occupiers of the business park.
- 4.37 Consequently, the proposed development is considered to comply with national and local planning policies that seek to promote sustainable transport.

Making Effective Use of Land

National Planning Policy Framework

- 4.38 Local planning authorities are required to promote an effective use of land in meeting the need for various uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions (paragraph 117).

Arun Local Plan (2018)

- 4.39 Policy SD SP1a states that the needs of the community will be met through sustainable growth and the provision of suitable services and encourages the effective use of previously development land, provided that it is not of high environmental value.

Policy Compliance

- 4.40 The aim of the proposed development is to make more efficient use of the service yard area by installing equipment that would allow for Amazon to operate more efficiently from the site. The internal access road alterations and associated lighting and drainage infrastructure would enable more efficient vehicular manoeuvring around the site, which would result in a safer working environment for all occupiers.
- 4.41 The proposed pedestrian footbridge would also allow for more efficient manoeuvring around the site by enabling uninterrupted vehicular access to the service yard area by separating pedestrian access across this part of the site.
- 4.42 Therefore, it is considered that the proposals comply with national and local planning policy requiring the efficient use of land.

Achieving Well-Designed Places

National Planning Policy Framework (2018)

- 4.43 Developments are required to be sympathetic to local character, including the surrounding built environment, and are visually attractive (paragraph 127).

Arun Local Plan (2018)

- 4.44 Policy D SP1 encourages all development proposals to reflect the characteristics of the site and local area in their layout, scale, materials, finish and architectural details.
- 4.45 Policy D DM1 states that in considering applications, the Council will have regard to character, appearance, impact, adaptability, layout, and scale.

Policy Compliance

- 4.46 The installation of V2G lifts and the covering canopy have been designed to reflect the industrial character and appearance of this part of the business park site. The scale of the covering canopy area is subservient to the adjacent units in terms of base dimensions and height and, therefore, would sit comfortably in the context of the service yard area.

4.47 As the equipment and canopy are only required for a temporary period, they have been designed in such a way that they can be dismantled and removed from site quickly and efficiently once they are no longer required, and the service yard area could be reinstated to its current condition. The canopy comprises a lightweight structure that would not require foundations, thus achieving the adaptability criteria required by planning policy.

4.48 The service yard area in which the proposed development would be located is sufficiently screened from the nearest residential areas to ensure that on-site operations would not impact on residential amenity.

4.49 In light of this, the proposals are considered to comply with national and local planning policy seeking to achieve well designed places.

Meeting the Challenge of Flooding

National Planning Policy Framework

4.50 The NPPF highlights the requirement for the planning system to take full account of flood risk in order to minimise vulnerability and improve resilience in the built and natural environment (paragraph 148). Development should be directed away from areas at highest existing or future risk of flooding (paragraph 155).

4.51 Where appropriate, planning applications should be supported by a site-specific flood-risk assessment (paragraph 163). Footnote 50 specifies that such an assessment is required for developments in Flood Zone 1 where the site area measures 1 hectare or more.

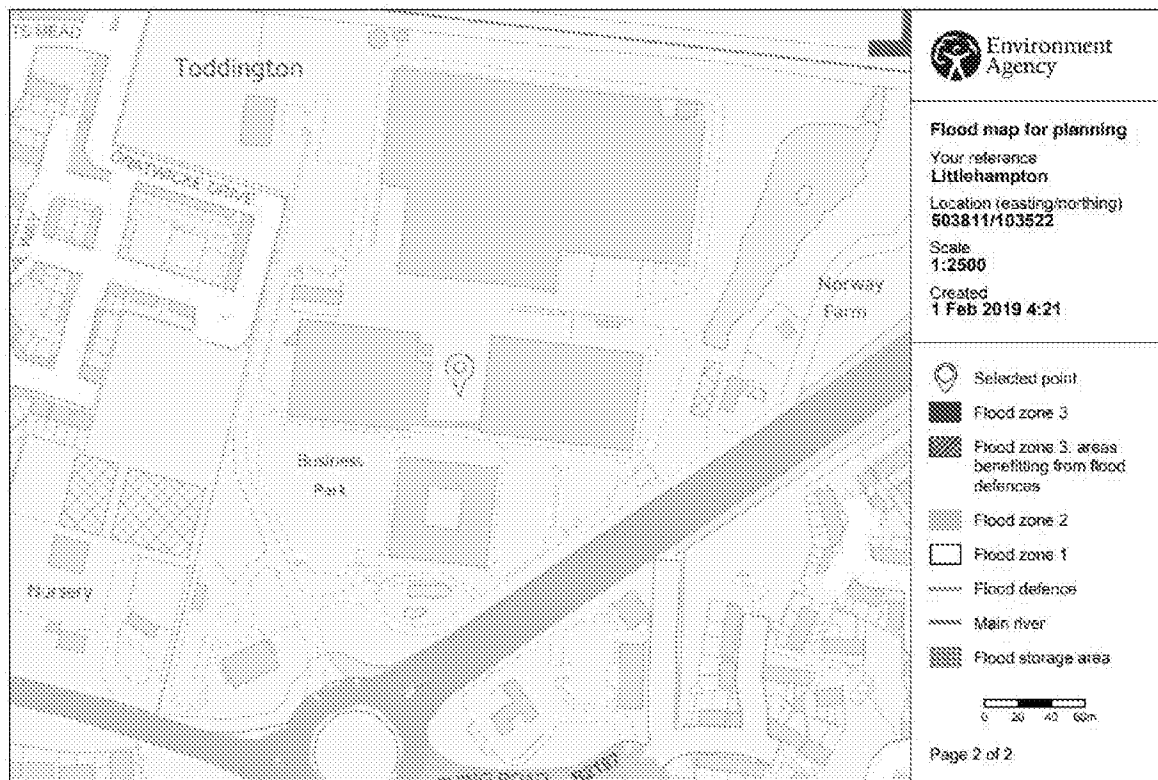
Arun Local Plan (2018)

4.52 Policy W DM2 requires Flood Risk Assessments to take into account contingency allowance, taking climate change into account as set out in the National Planning Practice Guidance.

Policy Compliance

4.53 The site is located within Flood Zone 1 according to the Environment Agency's Flood Map for Planning (see Figure 4.1). However, as the site area is over 1 hectare, a site-specific Flood Risk Assessment has been submitted in support of this application.

Figure 4.1 – EA Flood Map for Planning



- 4.54 The proposed development is considered to be appropriate given the site's Flood Risk status and minor nature of the proposed amendments to the internal access road. The associated increase in hardstanding would result in a minor increase in surface water runoff, which should be easily accommodated in the existing surface water drainage system. As such, the proposals are not considered to result in an increase in the risk of flooding on the site or elsewhere.
- 4.55 Consequently, the proposed development is considered to comply with national and local flood risk related planning policy.

Conserving and Enhancing the Natural Environment

National Planning Policy Framework

- 4.56 The NPPF states that the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity, and preventing new development from contributing to unacceptable levels of pollution (paragraph 170).
- 4.57 New development should be appropriate for its location taking into account the likely effects of pollution on the natural environment. In doing so, developments should avoid noise giving rise to significant adverse impacts on health and quality of life, and should limit the impact of light pollution from artificial light on local amenity and nature conservation (paragraph 180).

Arun Local Plan (2018)

4.58 Local Plan Policy ENV DM5 requires development schemes to protect existing habitats on site and minimise adverse impacts on them.

Policy Compliance

4.59 The proposed alterations to the internal access road have necessitated the loss of an area of landscaping on the site's northern edge, and also on the eastern end of the site. In order to assess any potential environmental impacts associated with the scheme, these areas have been assessed as part of an ecological assessment and arboricultural assessment, both of which are submitted in support of the planning application.

4.60 The ecological assessment concludes that the site has potential to support reptiles, nesting birds and hedgehogs. Recommendations for the proposed development include:

- undertaking clearance or management works to on-site trees outside of the main bird nesting season;
- allowing access and egress for hedgehogs in all new fencing on the site; and,
- undertaking vegetation clearance along the northern edge of the site outside the reptile hibernation period.

4.61 Similarly, the arboricultural assessment concludes that the majority of on-site trees fall within Category B. An exception is an Indian bean tree adjacent to the east boundary, which is a memorial tree and as such is placed in Category A. If retained, the on-site trees will require protection measures to ensure no impact occurs as a result of any development.

4.62 A plan showing the lux levels associated with the proposed lighting scheme demonstrates that there would be no adverse impact on residential amenity resulting from the proposals. Instead, the proposed lighting would allow for a safer working environment for all business park occupiers.

4.63 As demonstrated by the suite of supporting assessments, the proposed development would not result in significant impacts on biodiversity interests. Accordingly, the proposals are considered to comply with national and local planning policy seeking to conserve and enhance the natural environment.

5.0 CONCLUSION

- 5.1 The Site at Watersmead Business Park comprises land within the service yard between Units 3, 5 and 6, and the internal access road into the business park from Norway Lane.
- 5.2 The proposals, the subject of this planning application, are required to improve the the Site, by enhancing vehicle manoeuvrability around the site's internal access road and improve pedestrian safety within the service yard area. The proposed V2G lifts and associated covering canopy are required for a temporary period of 5 years only, after which the relevant part of the service yard would be reinstated to their current condition.
- 5.3 The access road amendments, the associated lighting and drainage infrastructure provision, and the elevated pedestrian walkway would be permanent changes to the site and would benefit current and future occupiers of the business park.
- 5.4 All key planning considerations have been taken into account in the preparation of the development proposals, which comply with national and local Development Plan policies.
- 5.5 In short, these proposals represent sustainable development, securing improvements to economic productivity without negatively impacting on biodiversity, arboricultural, amenity or flood risk interests. The development has been demonstrated to be compliant with the Development Plan and, therefore, warrants support from the Local Planning Authority.