

Breezie Allwright

From: Emma Sheppard
Sent: 03 October 2025 15:42
To: Chris White; Planning.Responses
Subject: Ref: LU/93/25): Service Yard Hours & Response to EHO comments
Attachments: TN6.0 - HGV Flow comparison COMPLETE.pdf; TN2-23.9.25-Watersmead Business Park Noise Response-2422899-GJK.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Chris

I hope you are well.

In respect of the above application, please see the email below and attached documents.

We will send out formal reconsultation but if you are able to provide a response sooner, that would be much appreciated.

██████████ please can these documents and email be uploaded and a formal reconsultation be issued to EHO.

Kind regards

Emma

Emma Sheppard BA (Hons) MRTPI
Principal Planning Officer
Planning Services

T: 07851 243252
E: emma.sheppard@arun.gov.uk

Working days Tuesday-Friday

Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk



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From: Mark Harris <[REDACTED]>
Sent: 24 September 2025 08:44
To: Emma Sheppard <Emma.Sheppard@arun.gov.uk>
Cc: Beth Evans [REDACTED]
Subject: Land at Norway Lane, Littlehampton (LPA Ref: LU/93/25): Service Yard Hours & Response to EHO comments [FREETHS-ACTIVE.FID5583079]

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Morning Emma

I refer to the above application and our recent discussions regarding the EHO's position on service yard hours and the proposed hours restriction from 0600 hours during weekdays.

I understand from the EHO's email of 28th August 2025, that the restriction is recommended as the site is to be split into "*more units which include food units which is likely to increase the number and frequency of deliveries*". The recommended restriction is unacceptable as a number of the prospective retailers require access to and operation of the service yard from 0500 hours. We also consider it to be unjustified as there is otherwise no intended activity between the hours of 0000-0500. This is an important benefit for the amenity of nearby residents as the existing permitted use is unrestricted and the former tenant operated on a 24 hour basis. The Body Shop RDC unit to the rear has a similar operation and is unrestricted with service yard activity and vehicle movement along Norway Lane during nighttime hours. This is a known characteristic for the area.

Given the EHO's rationale for a restriction from 0600, we have sought further advice from the applicant's highway and acoustic consultants to understand whether the rationale for a restriction on increase delivery numbers and frequency is justified. Their respective responses are provided on the attached brief note. The key points to note are:

Transport:

- The transport note has assessed a period of 0500-2200 to assess the difference between the current and proposed uses. This is an appropriate assessment period given the reduced number of trips post 2200 hours.
- Table 3.2 identifies typically 150 trips for a warehouse use between 0500-2200. This is based on TRICS data as there is no survey data available of the site prior to vacancy. It is however common ground with your Council that the former operator was a high-frequency distribution operator with a night time operation. As stated, the neighbouring Body Shop RDC also has existing unrestricted use.
- Tables 4.2 and 4.4 summarise the typical level of HGV trips for the anticipated food and non-food floorspace. This is measured on a floorspace basis and not units. Floorspace is the established metric for trip generation and there is no anticipated difference for a sub-divided scheme such as this.
- Table 5.1 demonstrates a considerable daily net reduction between warehouse and food & non-food retail uses of 85 trips over the study period. Based on the difference between the two uses, the balance of probability is there will be considerably fewer trips in the 0500-0700 period than the extant use (see paragraph 5.5).

Acoustic:

- The site and neighbouring RDC's unrestricted use and noise from delivery activity is a character of the existing noise climate. Noise from HGV movements and unloading would not be distinguishable from the existing use.
- The submitted acoustic assessment was based on all units receiving and unloading a delivery during the daytime and night time period.
- The only retailers likely to require deliveries from 0500 hours onwards are the anticipated food / F&B retailers in Units A2, A3 and A5. This is for fresh produce in advance of store opening and is thus an essential requirement.

- A supplementary acoustic assessment has been undertaken based on the three units receiving and unloading a delivery during the nighttime period (see Table 1 and Appendix A of the attachment).
- This demonstrates noise from servicing activity at Units A2, A3 and A5 will not cause a significant adverse impact during the operational period of 0500-0000 hours. A nighttime restriction between 0000-0500 hours will also be a benefit to residents both in terms of noise and service yard traffic generation.

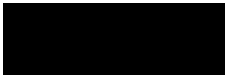
On this basis, there is no material difference between 0500 and 0600 hours. Given the operational requirement from prospective tenants and the amenity benefit moving from an unrestricted position will offer, we recommend the imposition of a condition that only restricts service yard activity from 0500 onwards during weekdays. This is justified based on the highways and acoustic evidence provided.

We would be grateful if you could re-consult with your EHO colleague and consider our request. In the meantime, should you have any queries or wish to discuss further, please do not hesitate to contact Beth or myself.

Regards,

Mark

Mark Harris
Partner



FREETHS



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