

Mr H Chalk
Development Management
Arun District Council
Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

19 June 2026
OUR REF: u2b_25_ra

Dear Mr Chalk

UNIT 2 BROOKSIDE AVENUE RUSTINGTON LITTLEHAMPTON BN16 3LF
PLANNING DESIGN AND ACCESS STATEMENT ADDENDUM
FOLLOWING REFUSAL OF R/224/24/PL

Background / Purpose of Pre-Application

1. I am instructed by The Rookery Estates Company (the Applicant) to prepare this Planning, Design and Access Statement Addendum in support of a revised proposal following the determination of planning application **R/224/24/PL** which was refused on 23 April 2025 and sought the following development:

“Demolition of existing building and erection of 4 No. commercial units with associated access, parking and landscaping works”.

2. The application was refused on the following sole ground:

1 The proposal has not been supported by sufficient evidence or detail related to the existing and proposed surface water drainage schemes to conclude that the site can be drained sustainably or viably and therefore, runs significant risk of increasing flood risk elsewhere in conflict with Arun Local Plan Policies W DM2 & W DM3, Policy 4 of the Rustington Neighbourhood Development Plan, and paragraphs 181, 182 & 187(e) of the NPPF.

3. The purpose of this Addendum is to outline how this revised proposal has addressed the sole ground of refusal under **R/224/24/PL**.
4. The Applicant has fully engaged with the Council following the refusal which included obtaining pre-application advice under reference **PAA/101/25** which involved meeting with the Planning Officer and the Council's Drainage Officer.

Submission Documents

5. This revised application is supported by the following new information:
 - Surface Water Drainage Design - RMB Consultants (Civil Engineering) Ltd
6. The previous documents lodged under **R/224/24/PL** are resubmitted for the purposes of this application:
 - Transport Statement – Motion
 - Construction Traffic Management Plan – Motion
 - Preliminary Ecological Appraisal – Greenlink Ecology
 - BNG Baseline Plan – Greenlink Ecology
 - BNG Metric Spreadsheet – Greenlink Ecology
 - Economic Development Statement – The Rookery Estates Company
7. The submission is supported by a full suite of architectural plans of the existing building as well as the proposed development which have been prepared by Clague Architects.

Proposal

8. The proposal remains essentially the same as the development submitted under **R/224/24/PL** but with a new drainage design to address the ground of refusal.
9. The one change has been to introduce an external cycle shelter for 4 No. bicycles in place of one of the previous parking spaces. The total number of parking spaces proposed has therefore been reduced from 17no. spaces to 16no. spaces.

Site & Surroundings

10. The application site is situated on the western side of Brookside Avenue, at the junction with Artex Avenue on the northern edge of Rustington.
11. The site is located within the established Brookside Trading Estate between houses on southern boundary and the railway on the northern side. The character of the area comprises large industrial units and warehouses which are of a variety of ages, appearances and styles. The buildings also vary in scale from single to three storeys. The buildings are separated by estate roads, pockets of landscaping and parking forecourts.

The units comprise a mixture of uses including light industrial units, warehouses and workshops.

12. The site itself comprises a large, detached warehouse and industrial unit of circa 890sqm. The unit was previously used by Precision Products (Brighton) Limited a family run engineering firm established in 1974. In July 2020 West Oak Capital Limited acquired a controlling interest in the company. The unit has been vacant since September 2023.
13. The site comprises amenity grassland at the junction with Brookside Avenue and a row of parking spaces along the northern boundary.
14. The application site is situated within the built confines and is not covered by any heritage, landscape or ecological designations. The site is in Flood Zone 1.

Planning Policy

15. The following documents have been reviewed as part of this addendum:

- NPPF 2024
- NPPG
- Arun Local Plan 2011-2031 (2018)
- Arun District Design Guide Update Adopted 2024
- Arun Parking Standards
- Rustington Neighbourhood Plan 2014

16. I have referred to the relevant policies in the below assessment.

Planning Merits

(i) Common Ground for Revised Planning Application

17. Given the sole refusal ground for **R/224/24/PL**, which related to drainage only, the following material planning considerations can be considered common ground between parties for this revised application:

Principle

- The redevelopment of this brownfield site is acceptable in principle.
- The proposal would be a welcomed brownfield redevelopment that would serve to enhance the employment site and the wider estate.

Character & Design

- The building would have a commercial appearance and remain in keeping with the variety of commercial buildings in the surrounding area.
- The two-storey scale and overall bulk of the building is acceptable.

Transport & Parking

- Car parking is acceptable but external cycle shelter should be provided in place of one of the parking spaces. Whilst this is a potential shortfall of 1 No. car parking space, the Council would have supported alternative sustainable transport facilities that would mitigate the potential shortfall of 1 No. parking space. *Please note this has been incorporated into the revised application.*

Ecology & Biodiversity

- The proposal would achieve a biodiversity net gain, and the submitted preliminary ecological appraisal has confirmed no impacts to protected species.

18. The following section will therefore review the one remaining issue which relates to the proposals impact on the drainage network.

(ii) Drainage

19. This revised planning application has been informed by detailed pre-application advice with the Council under **PAA/101/25** following the refusal of **R/224/24/PL**. This has informed the updated **Surface Water Drainage Design** by RMB Consultants.

20. The site lies within flood zone 1 and is at very low risk of flooding from all other sources.

21. As outlined in the **Surface Water Drainage Design**, the following constraints have informed the surface water drainage design:

- Soakaways are discounted as it is not possible to place them at least 5m from structures or 10m from buildings.
- There are no watercourses adjacent to the site.
- The existing site drains to the highway drainage network.
- Made Ground is present to a depth of at least 1.01m in TP01 and 0.45m and 0.50m in WS01 and WS02 respectively.
- Groundwater was recorded at 2.502mAOD below ground level in WS02.
- An infiltration rate of 1.05×10^{-5} m/s was recorded in the winter percolation tests.

22. Given the above, a shallow surface water drainage design is most appropriate. Permeable paving provides shallow storage and good water quality treatment and is proposed. Infiltration is proposed with the Made Ground excavated and replaced by coarse graded aggregate with the base of the permeable paving being sited 1m above the maximum recorded groundwater level.
23. The surface water drainage design is based on infiltration. Two areas of permeable paving are identified with the rear and side of the building drained via infiltration trenches
24. The existing surface water drainage will be removed ensuring no runoff to the surface water drainage system from the site.
25. Using infiltration means that the first 5mm of rainfall does not result in runoff from the site and the design meets the interception standard.
26. The surface water drainage design accommodates runoff under all storm events up to and including the 1 in 100 year event plus an allowance of 45% for climate change. There is no above ground flooding under the 1 in 100 year rainfall event with an allowance of 45% for climate change.
27. For the roof and parking areas the infiltration trench and permeable paving have a total pollution mitigation index that is greater than the pollution hazard index for all pollutants. All runoff from the site will receive an appropriate level of water quality treatment.
28. In terms of Biodiversity Net Gain, as documented in the **Preliminary Ecological Appraisal**, the proposal will incorporate 2no. new native species of tree (e.g. crab apple and hawthorn) within the grassland in front of the site. Biodiversity benefit is therefore delivered by the submitted drainage design by the incorporation of these trees.
29. The **Surface Water Drainage Design** outlines that the proposed development is acceptable from a surface water drainage perspective. For this reason, the revised proposal addresses the sole refusal ground under **R/224/24/PL** and is therefore in accordance the NPPF, Arun Local Plan Policies W DM2 & W DM3 and Policy 4 of the Rustington Neighbourhood Development Plan.

Conclusion & Planning Balance

30. This Planning, Design and Access Statement Addendum has outlined a detailed analysis that the revised scheme presented overcomes the previous refusal ground raised by the Council under planning application **R/224/24/PL**.

31. There is significant policy support for the redevelopment of existing commercial/industrial sites for enhanced use. The proposal will significantly improve the quality and function of the existing employment use and will have a positive impact on jobs and on the local economy.
32. In view of the above, it is concluded that the development proposed in this application is consistent with the aims and detailed requirements of the NPPF, Arun Local Plan Policies W DM2 & W DM3 and Policy 4 of the Rustington Neighbourhood Development Plan and it is respectfully requested that planning permission is granted.
33. I trust this adequately sets out the revised proposal, but please let me know if you need any further information in the first instance.

Yours sincerely

[Redacted Signature]

Neal Thompson BSc (Hons) MSc MRTPI
ROBINSON ESCOTT PLANNING