

PLANNING APPLICATION REPORT

REF NO: A/58/23/RES

LOCATION: Land off Arundel Road  
Angmering  
BN16 4ET

PROPOSAL: Approval of reserved matters following A/122/19/OUT and varied by A/207/21/PL pertaining to the layout, scale, appearance and landscaping for a commercial building of 15,000 sqft (1,393 sqm) that can be used for either Class E(g)(i) (formerly Class B1) and or Class B2, with associated landscaping and parking.

<b>SITE AND SURROUNDINGS</b>
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## DESCRIPTION OF APPLICATION

The application seeks reserved matters for a commercial building of 15,000 square feet (1,393 sqm) together with landscaping and parking. The access arrangements were approved by A/122/19/OUT (as amended by A/207/21/PL). The wider residential part of the site has separately received reserved matters consent under A/282/22/RES.

The commercial building will measure 56m wide by 14m deep and 6.9m high. It comprises of 6 units each of the same size and including a WC, kitchenette, and stairs to a first floor. Ground floor access to each unit is by a personnel door and a roller shutter door. Windows are shown at both floors to front and rear only. It is stated that the building can easily be converted into 1, 2, or 4 units depending on who the end user(s) will be. The building will be constructed from brick with a metal curtain wall and metal cladding to the roof.

The layout also shows 37 car parking spaces, a covered cycle store of 10 spaces and an area of the site in the south-east corner reserved as a future access into the recreation land to the south. There are Council proposals to 'redevelop' (upgrade) this adjacent land as a Sports Hub and a new access is required to be provided hence this proposal.

The location of the commercial building enables the retention of existing vegetation minimising the need for large amounts of additional planting however, additional native buffer planting is proposed on the eastern, southern, and western site boundaries in order to strengthen the landscaping in these locations. In addition, landscaped strips are proposed between and around parking bays.

## TOPOGRAPHY

Predominantly flat, with land rising to the north.

## TREES

A 4m high Goat Willow and a 5m high Ash tree are to be

BOUNDARY TREATMENT	removed.
SITE CHARACTERISTICS	The boundary treatment for the site varies and includes post and rail fencing, hedgerows and trees of various heights.
CHARACTER OF LOCALITY	<p>The site is is part of a former commercial development at New Farm Nursery. This was historically occupied by nine businesses, including vehicle repair shops, a window showroom/workshop and storage of cars &amp; caravans.</p> <p>The site lies in a predominantly rural area which is characterised by a linear form of existing and approved residential development along the road frontage with Arundel Road however to the south, beyond the sports pitches, the character is different with residential development extending westwards away from the road.</p> <p>The development site is bounded to the south by playing fields, sports pitches including a cricket pitch, a pavilion, and a multi-use games area (MUGA) at Palmer Road Recreation Ground. The other boundaries adjoin either the approved residential development or existing houses fronting Arundel Road to the east. The existing dwellings consist of 68, 68a and 68b Arundel Road which are all two storeys and back onto the site.</p>

<b>RELEVANT SITE HISTORY</b>
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A/282/22/RES	Approval of reserved matters following A/122/19/OUT and varied by A/207/21/PL pertaining to the layout, scale, appearance and landscaping for 160 No dwellings with associated public open space, landscaping, parking, ecological mitigation and earthworks. This application is a Departure from the Development Plan and is in CIL Zone 3 and is CIL Liable as new dwellings.	
A/235/21/DOC	Approval of details reserved by condition imposed under A/207/21/PL relating to condition 5-design code master plan.	DOC Approved 14-01-22
A/207/21/PL	Variation of condition following grant of A/122/19/OUT relating to Conditions Nos 4 - approved plans and 16 - vehicular access.	App Cond with S106 23-11-21
A/122/19/OUT	Outline application with some matters reserved for the erection of up to 160 dwellings with public open space, landscaping and sustainable drainage systems (SuDs), vehicular access point from Arundel Road; together with	App Cond with S106 17-03-20

up to 1,393 square metres (15,000 square feet) of B1/B2 units with associated parking provision and vehicular access point from Arundel Road and land made available for expansion of current sports pitch provision (following the demolition of existing commercial units and one bungalow) (re-submission following A/36/18/OUT). This application is a Departure from the Development Plan.

## **REPRESENTATIONS**

No comments received.

### **COMMENTS ON REPRESENTATIONS RECEIVED:**

Not applicable.

## **CONSULTATIONS**

### **CONSULTATION RESPONSES RECEIVED:**

SUSSEX POLICE - no objection but list a number of advisory notes regarding improving security.

WSCC HIGHWAYS - following receipt of revised plans showing vehicle tracking, raise no objections and request conditions to secure the car parking and cycle storage.

WSCC LEAD LOCAL FLOOD AUTHORITY - object because the Flood Risk Assessment (FRA) is not in accordance with the NPPF, Planning Practice Guidance (Flood risk and coastal change) or local policies. This means that flood risk could increase elsewhere.

WSCC FIRE & RESCUE - no objection subject to conditions to secure a new fire hydrant.

ADC LANDSCAPE OFFICER - raises concerns with the landscape scheme and that the potential future access road to the sports pitches does not continue to the red line boundary.

COUNCIL's ECOLOGIST - no objection subject to the scheme securing biodiversity mitigation & enhancement measures. Conditions are requested.

### **COMMENTS ON CONSULTATION RESPONSES:**

Comments noted and will be addressed in conclusions section except as discussed below.

WSCC HIGHWAYS - Highways have requested a condition to secure details of the cycle storage however this has been provided by the applicant in response to their earlier comments. Therefore, the condition will be worded to ensure the cycle storage is as per the approved drawings as opposed to seeking further details.

WSCC LEAD LOCAL FLOOD AUTHORITY - it is material that the drainage scheme will be subject to a separate agreement through the discharge of planning conditions. Should there be a situation where the drainage conditions cannot be agreed due to the layout not providing sufficient space then a new

reserved matters application would need to be submitted to account for the necessary drainage changes.

The council's Environmental Health Officer has not commented but it is material that outline condition (10) sets the operational/delivery hours: "No plant or machinery shall be operated, no process carried out and no deliveries taken or despatched from the Employment/Commercial Centre except between the hours of 07:00 and 18:00 hours on Monday to Fridays inclusive; 08:00 and 13:00 hours on Saturday; not at any time on Sundays or Public or Bank Holidays."

## **POLICY CONTEXT**

Designations applicable to site:

Outside the Built-up Area Boundary.  
Area of Advert Special Control,  
Current/Future Flood Zone 1.  
Within 500m of a WSCC Waste Site; and  
CIL Zone 3.

## **DEVELOPMENT PLAN POLICIES**

[Arun Local Plan 2011 - 2031:](#)

DSP1	D SP1 Design
DDM1	D DM1 Aspects of form and design quality
ECCSP1	ECC SP1 Adapting to Climate Change
ECCSP2	ECC SP2 Energy and climate change mitigation
ENVDM4	ENV DM4 Protection of trees
TSP1	T SP1 Transport and Development
QESP1	QE SP1 Quality of the Environment
WMDM1	WM DM1 Waste Management

[Angmering Neighbourhood Plan 2014 POLICY EH2](#) Protect the Landscape setting of the South Downs National Park

## **PLANNING POLICY GUIDANCE:**

NPPDG	National Design Guide
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance

## **SUPPLEMENTARY POLICY GUIDANCE:**

SPD11	Arun Parking Standards 2020
SPD13	Arun District Design Guide (SPD) January 2021

## **POLICY COMMENTARY**

The Development Plan consists of the Arun Local Plan 2011 - 2031 (ALP), West Sussex County Council's Waste and Minerals Plans, The South Inshore & South Offshore Marine Plan and Made Neighbourhood Development Plans. The policies are published under Regulations 19 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The relevant policies of the Angmering Neighbourhood Development Plan (ANDP) are discussed in this report.

## DEVELOPMENT PLAN AND/OR LEGISLATIVE BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states:

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

The proposal is in conflict with relevant development plan policies in that it fails to adequately integrate with adjoining land and therefore also fails to achieve a high standard of layout.

Section 70(2) of the Town and Country Planning Act 1990 (as amended) provides that:

- (2) in dealing with an application for planning permission the authority shall have regard to -
- (a) the provisions of the development plan, so far as material to the application,
  - (aza) a post examination draft neighbourhood development plan, so far as material to the application,
  - (b) any local finance considerations, so far as material to the application, and
  - (c) any other material considerations.

## OTHER MATERIAL CONSIDERATIONS

There are no other material considerations to be weighed in the balance with the Development Plan.

## CONCLUSIONS

PRINCIPLE:

The principle of development was established by A/122/19/OUT (as amended by A/207/21/PL) which granted permission for the erection of up to 160 dwellings with public open space, landscaping and Sustainable Urban Drainage Systems (SuDS), vehicular access from Arundel Road, together with up to 1,393sqm of B1/B2 units with associated parking provision and land made available for expansion of current sports pitch provision. That permission established the principle of development including flood risk, traffic generation, highway safety, archaeology, impact on wildlife, loss of agricultural land, impact on waste sites, countryside location, foul drainage (the principle of the new development connecting to the network) and the provision of affordable housing, public open space & children's play.

COMPLIANCE WITH THE OUTLINE:

It has been established by case law that applications for the approval of reserved matters must be within the scope of the outline planning permission and must be in accordance with the conditions annexed to the outline planning permission. Certain conditions imposed by the outline set parameters for the nature and form of the Reserved Matters submission and these are analysed below (with reference to the conditions on A/207/21/PL).

Condition 4 states that development shall be carried out in accordance with the approved plans which govern the access arrangements. The proposal is in accordance with these plans.

Condition 5 required that a Design Code Masterplan be approved prior to submission of the Reserved Matters and that the development then be prepared and carried out in accordance with the approved Design Code. This was approved by application ref A/235/21/DOC prior to the submission of the reserved matters. The proposed development largely accords with the Design Code with the only

exception being that no porches are shown above the personnel doors on the building. This is not detrimental to the scheme as a whole and the omission is therefore accepted.

Condition 35 sets the uses of the employment floorspaces as B1 (now class E(g)(i)) or B2 with no B8 uses allowed. The condition also sets the maximum height of the building/s as 12m. The condition is complied with as the building is 6.9m high and no B8 use is proposed.

#### LANDSCAPING:

ALP policy LAN DM1 requires that development have special regard to the conservation of the setting of the South Downs National Park (SDNP), including views into and out of the Park. Development must also respect the particular characteristics and natural features of the relevant landscape character areas. ANDP policy EH2 states development must not adversely impact upon the landscape setting or views into or out of the SDNP. ALP policies D DM1 and ENV DM4 are also relevant.

Views of the proposed development are largely confined to vantage points located to the south and west, with views from the north and east restricted by woodlands surrounding the site. There are views, filtered to varying degrees from the recreation ground and surrounding housing to the south, as well as public right of ways crossing farmland to the south-west.

The application is accompanied by detailed planting plans, and these show the introduction of new trees of various heights, native buffer mix planting, ornamental amenity shrubs, ornamental/native hedges, grassed areas, and specimen/climbing shrubs. The planting scheme will reinforce the landscaped edges to the southern and eastern boundaries. It will also create new buffering to the northern and western boundaries with the surrounding new residential development.

This in conjunction with the distance of this part of the site (and the intervening residential development) will prevent any impacts on the SDNP. The planting proposals will also help to soften and screen the commercial buildings from immediately adjoining land. The planting scheme will also provide ecological and wildlife benefits.

The council's Landscape Officer raises concerns with the landscaping scheme stating that some tree cover to form intermittent but not obtrusive screening for the adjacent new dwellings is required. In addition, request that plant specification quantities and sizes are shown on the planting plan. These matters can be resolved by way of a landscaping condition which will allow changes to be made and agreed post decision.

The proposal therefore accords with the requirements of ALP policy LAN DM1, and policy EH2 of the ANDP.

#### LAYOUT, APPEARANCE AND SCALE:

ALP policies D DM1 and D SP1 are relevant in respect of design and character. The National Design Guide (NDG) is a material consideration in the determination of this application, as well as the Arun Design Guide (ADG). The application has been prepared in accordance with the approved Design Code, which itself has been prepared and assessed against the requirements of the NDG and the ADG.

The commercial development area reflects the subdivision of the wider site shown on previously approved plans. It is situated in the south-eastern corner of the wider site and corresponds with land formerly used for commercial purposes. It is to be accessed from an existing approved secondary access point from Arundel Road. The site layout is appropriate given the size and shape of the site. The proposed building has a simple form and is sited as far away from existing/proposed residential dwellings

as possible whilst also allowing space for landscaping on the southern boundary. The space to the North of the building is largely taken up by the parking provision necessary to support the use but at the same time, landscaping is included to make these areas as visually pleasant as possible.

The building itself reflects the approved Design Code and as such no concerns are raised with its design or scale. Therefore, the proposal as a whole is acceptable with regard to layout, appearance & scale and there are no conflicts with any of the relevant policies.

On the eastern side between the building and the existing houses is indicated a future access point to the adjacent recreation ground (future Sports Hub). This would mean it would be located only a few metres from the existing residential curtilages. However, these houses were previously adjacent to a vehicle storage use. Furthermore, to site the access elsewhere would give rise to conflict between the route and commercial vehicle movements within the car park. In any case, speeds on entering the future sports hub are likely to be low thus minimising any noise disturbance. The landscaping proposed to the eastern edge will also help with this.

As noted, the sports hub access is indicated on the plans however the layout only shows a short section of access road (approximately 13m in length) and then a note stating that the grassed space at the end of this is reserved as access. The distance between the end of the access and the boundary is approximately 19m.

A condition was initially proposed to secure the future access road to the boundary should the Sports Hub be developed but although the applicant originally suggested securing this by a condition, upon review of the suggested wording, the applicant would not agree to this and then advised that there was no need for a condition as the access is shown on the plans. At this point, the applicant was requested to show the full extent of the access (i.e. going all the way to the red edged site boundary). This would then provide certainty that the access link will be provided. However, the applicant has also declined this stating:

"The outline planning permission did not secure a requirement to deliver a connection to the land to the south and there is no policy requirement for it either. The playing fields already have a point of access and there is a further point of access being considered in addition to an access through our site; the safeguarding of land (as currently shown on the plans) ensures this third option remains on the table. There is no planning requirement for an access to the adjoining land and this cannot be considered in the determination of this Reserved Matters Application (RMA). We have maintained that we are open to continued discussions around access to the proposed Sports Hub should it come forward, and we remain open to those discussions once the Sports Hub proposals are further advanced. Approval of this RMA would keep this option available for consideration."

It is accepted that this requirement was not imposed on the outline by either a condition or through the s106 legal agreement. It is also acknowledged that as yet there are no detailed plans of the proposals for the Sports Hub development or the position of its access. However, the local planning authority has concerns that in the absence of a mechanism to secure the connection to the site boundary, there is no certainty that the developer or future site owner will agree to the access link in the future. As it stands, the applicant could simply refuse to enter into negotiations to deliver the access if it is required in the future. Therefore, the failure to deliver this access could undermine the future delivery of the Sports Hub.

Part of the benefits of the outline permission and reasons for approving it contrary to the development plan policies, was the benefits associated with the delivery of the qualitative and quantitative open space improvements to the south of the site. The Outline application was supported by the Parish Council partly as a result of this. The omission of an access to this area could prejudice the delivery of these improvements.

The omission of the access detail represents poor site planning/design and a failure to adequately consider site connectivity. ALP policy D DM1 (10) requires that development schemes improve access through the delivery of a variety of integrated networks, to and from residential areas, commercial zones, and open spaces. The ADG sets out that developments should demonstrate permeability (connectivity) and integration with adjoining land. Section D states schemes should "create connections with the site's surroundings, promoting integration and permeability".

It is noted that as part of the approved scheme for A/282/22/RES, an area of land (2.1ha) was shown as being gifted to the council as a sports pitch. However, whilst there would be no boundaries preventing pedestrian access to the sports land, the residential scheme makes no provision for vehicular access or parking for this facility and therefore it was also seen as vital that there be vehicular access from the wider estate to the adjacent sports land. This will provide vehicular access options for persons from the estate and also seek to limit the potential for parking by Sports Hub visitors within the estate roads.

The omission of the access is in conflict with the relevant policies of the development plan and the Arun Design Guide.

#### OTHER MATTERS:

##### (A) Residential Amenity:

ALP policies D DM1, D DM2 and QE SP1 are relevant. The ADG sets out guidance on interface distances between houses:

- Back-to-back: min. 21m between habitable rooms of properties or to existing buildings.
- Back/ front to side: min. 14m between habitable rooms and side gable of adjacent property.
- Front to front: min. 16m between habitable rooms and site boundary to existing landscaping; and
- The rear gardens of residential houses should be at least 10.5m deep.

Whilst there are no standards for the interfaces between residential and non-residential buildings, it would be appropriate to maintain these distances where there are windows involved. The layout has been checked and these are the interfaces to nearby dwellings:

- at least 33m from the front to the rear of plots 24-28.
- at least 15m from the western flank to the rear of plots 36/37 to the west; and
- at least 26m from eastern flank to rear of 68 Arundel Road.

The new commercial use will generate some noise and other disturbance which will impact upon nearby residents. However, the use has already been accepted by the outline permission whilst there was previously a commercial/light industrial use on this site. There is an outline condition which controls the hours of use, and this will ensure that residential amenity is protected during evenings and weekends. Therefore, the ADG standards are met and there is no conflict with the relevant policies.

##### (B) Parking, Roads, and Public Footpaths:

ALP policy T SP1 and the Arun Parking Standards SPD are relevant. The principle of the commercial floorspace along with the 160 dwellings was deemed acceptable through the outline permission, with no concerns regarding highway safety or operation.

The application proposes a total of 37 parking spaces and 10 cycle storage spaces. The Parking SPD provides separate standards for B1 (class (g)(i)) and B2 uses and there is no certainty at this time which



parts of the building will be for which use. Therefore, it is necessary to look at both of the standards:

**Car Parking**

If all B1 then need: 1 space per 30sqm = 46 spaces.

If all B2 then need: 1 space per 40sqm = 35 spaces.

Average of two requirements is: 41 spaces.

**Cycle Parking**

If all B1 then need: 1 space per 150sqm for staff and 1 space per 500sqm for visitors = 12.

If all B2 then need: 1 space per 200sqm for staff and 1 space per 500sqm for visitors = 10.

Average of two requirements is: 11 spaces.

Therefore, the proposal is short of both the average and worst-case scenarios. However, it is material that WSCC Highways have raised no objections to the layout or the parking provision. Furthermore, the site is constrained by the need to provide landscaping, the sports hub access and to ensure dark buffer areas to the boundaries. The scheme also has to ensure a degree of separation from the new/existing dwellings. On this basis, a reduced provision can be agreed.

The proposed road widths in the layout are in accordance with the Design Code whereby the principles of road hierarchy were established. The proposal is therefore appropriate and there is no conflict with ALP policy T SP1.

**(C) Waste Management:**

ALP policy WM DM1 is relevant but, in this case, there are no issues with refuse vehicles accessing the site from Arundel Road, and the application is supported by refuse vehicle tracking (to which WSCC raise no concerns). The application states that the layout will be provided with refuse collection points and that there will be provision for commercial waste/recycling bins. Overall, the development accords with policy WM DM1 of the ALP.

**(D) Surface Water Drainage**

This is a separate matter as drainage is covered by conditions 25, 26, 28 on the outline planning permission and will be agreed through the discharge of such conditions. In addition, condition 31 seeks to control proposed site levels. Whilst there is an objection from WSCC Drainage, the application has not attracted any consultation advice from the council's own drainage engineers. Should there be a situation where the drainage conditions cannot be agreed in the future due to the layout not providing sufficient space then a new reserved matters application would need to be submitted to account for the necessary drainage changes. On this basis, this reserved matter application can be determined without the support of drainage engineers and therefore it is not necessary to demonstrate compliance with the relevant policies at this time.

**(E) Biodiversity Net Gain:**

ALP policy ENV DM5 states development schemes shall seek to achieve a net gain in biodiversity and protect habitats on site. In addition, condition 4 of A/207/21/PL requires that the development be in accordance with the 'Ecological Mitigation and Enhancement Strategy' prepared by CSA Environmental (Ref. CSA/3467/09), dated July 2019.

Biodiversity was assessed at the outline stage and the council's ecologist raised no objections at that time. This application is accompanied by a Technical Note "Ecology Constraints for Commercial Site" which includes details of the ecological protection and mitigation and measures to be included. This

includes a dark buffer area to the southern & eastern boundaries and the management of grassland to deter reptiles. The council's ecologist has assessed the details and raises no concerns subject to conditions plus future compliance with condition 23 on the outline. The conditions proposed reflect those that were also imposed on the residential reserved matters permission.

It is noted that 2 trees are to be removed in this area. The proposed landscaping scheme shows the planting of a significantly greater number of new trees than the number to be lost (13) so the proposals will also achieve a net gain in tree units on the site. The application demonstrates biodiversity enhancement and there is no conflict with ALP policy ENV DM5.

**(F) Climate Change:**

Condition 21 on the outline permission (as amended) requires the approval of measures to provide 10% of the energy supply of the development from decentralised and renewable or low carbon energy sources. As these details are required to be approved through the discharge of this condition, it is not reasonable to require compliance at the reserved matters stage. With the condition in place and subject to the proposed plans the proposal would likely accord with ALP policy ECC SP2. In addition, condition 24 requires the separate approval of details of electric vehicle charge points, and this will ensure compliance with the requirements of ALP policy QE DM3(c).

**SUMMARY**

There is a minor deviation from the approved Design Code and a slight conflict in terms of parking provision, but these are not significant issues and would not prevent an approval from being given. However, the absence of the full extent of the sports hub access represents poor planning/design and is tantamount to it not being provided. For this reason, the current application cannot be supported.

The presumption in favour of sustainable development (para 11 of the NPPF) does not apply to this conclusion as the application does not involve the provision of housing and the relevant policies regarding employment development are either not out of date or reflect the advice in the NPPF. The economic benefits of the scheme are noted but this is not significant enough to outweigh the harm generated by the proposal, particularly given that the employment development is in itself required to compensate for that to be lost from the existing site.

**HUMAN RIGHTS ACT**

The Council in making a decision, should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as Arun District Council to act in a manner, which is incompatible with the European Convention on Human Rights.

Consideration has been specifically given to Article 8 (Right to respect private and family life), Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for refusal of permission in this case interferes with applicant's right to respect for their private and family life and their home, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of neighbours). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for refusal is considered to be a proportionate response to the submitted application based on the considerations set out in this report.

**DUTY UNDER THE EQUALITIES ACT 2010**

Duty under the Equalities Act 2010

In assessing this proposal the following impacts have been identified upon those people with the following protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation).

The proposal would have a neutral impact on the protected characteristics.

**RECOMMENDATION**

REFUSE

- 1 The proposed scheme fails to properly show the future road connection to the adjacent Sports Hub land and so does not ensure that the site integrates with surrounding land and fails to achieve a high standard of layout and design in conflict with Arun Local Plan policy D DM1, the Arun Design Guide and the NPPF.
- 2 **INFORMATIVE:** Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern with the proposal and discussing those with the Applicant. However, the issues are so fundamental to the proposal that it has not been possible to negotiate a satisfactory way forward and due to the harm which has been clearly identified within the reason(s) for the refusal, approval has not been possible.

**BACKGROUND PAPERS**

[The documents relating to this application can be viewed on the Arun District Council website by going to https://www.arun.gov.uk/weekly-lists and entering the application reference or directly by clicking on this link.](https://www.arun.gov.uk/weekly-lists)

**A/58/23/RES - Indicative Location Plan (Do not Scale or Copy)**  
**(All plans face north unless otherwise indicated with a north point)**



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