

PLANNING APPLICATION REPORT

REF NO:	WA/29/24/PL
LOCATION:	Tokar Industrial Estate Yapton Lane Walberton BN18 0AS
PROPOSAL:	Erection of a two storey church building with capacity for 340 persons along with creation of associated car park. This application is in CIL zone 3 (zero rated) as other development. This application is a Departure from the Development Plan.

SITE AND SURROUNDINGS

DESCRIPTION OF APPLICATION	<p>The church building includes a large hall with stage, a side hall, kitchen and dining area, nursery, office, toilets (including a changing places toilet) and three upstairs classrooms. The building will be 8.3m high to the ridge and 2.3m to the eaves. Externally, there will be a 93-space car park and this provision includes 6 accessible spaces and 4 electric vehicle spaces. Also proposed are 5 minibus/coach spaces which can double as refuse/delivery vehicle parking and a pick-up/drop-off area.</p> <p>The applicant agreed, as per the request by WSCC Highways, to widen the existing access road in two places and provide a passing place. The proposal will remove the portacabin building but it is proposed to retain the marquee until the Church has been constructed and is ready for use.</p>
SITE AREA	2.25 hectares.
TOPOGRAPHY	Predominantly flat.
TREES	The Tree Survey & Arboricultural Impact Assessment identifies 50 individual trees, 1 tree group and two hedgerows.
BOUNDARY TREATMENT	<ul style="list-style-type: none"> - 1.7m high wire mesh fencing to the east. - 1.7m high wire mesh fencing with trees to the north., - Open to the south other than a small section of 3m hedge to the access; and - Open to the west.
SITE CHARACTERISTICS	A large flat grassed area of land occupied by a portable building. The land is surrounded by trees & hedging and the land is partially split by a row of trees running north/south with the portacabin on the eastern side of this. There is an access from Yapton Lane which serves a dwelling, "Lazy W". A mature manicured hedge runs along the northern edge of the access until it meets the site. There is a shipping container present in the eastern part of the site. A footpath runs adjacent to (but outside of) the northern boundary.

CHARACTER OF LOCALITY

The area is mixed in character comprising a mix of open agricultural land, allotments, industrial buildings, and residential dwellings. To the east is a current building site concerning six dwellings on the site of the dwelling known as Spindlewood. Four of these (two storey) will back onto the church. To the south of the access is Rosewood and then 1-6 Progress Close. Beyond Progress Close is the main access to the Tokar Industrial Estate.

RELEVANT SITE HISTORY

WA/25/23/PL	Erection of a marquee for a temporary period of 3 years for use as an alternative venue for Yapton Free Church during April - September inclusively. This application is a Departure from the Development Plan and is in CIL zone 3 (Zero Rated) as other development.	ApproveConditionally 23-06-23
WA/59/22/CLE	Lawful development certificate for the existing change of use of land and siting of a porta building all in connection with activities associated with Yapton Free Church.	Approve 12-07-22

WA/59/22/CLE was granted in relation to a portacabin building but this did not confirm the use of this building or of the surrounding land. The officer report commented that the surrounding land was stated to have been used for various Christian activities including camps, summer schools, baptisms, other meetings and weddings but that the evidence was very limited with no indication of the duration of events and that without precise evidence, it was not possible to grant a lawful development certificate for the whole of the extent of land applied for. WA/25/23/PL granted a three-year consent for a Marquee (a venue for Yapton Free Church) which is sited just outside the red edge to the south of an access road.

REPRESENTATIONS

Walberton Parish Council object for the following reasons:

- Not an allocated site.
- Flooding from surface water due to the amount of hard surfacing.
- Flooding from foul drainage due to insufficient local capacity.
- A condition should be applied preventing use until surface/foul water drainage issues have been resolved.
- Harm to the setting of the Grade I listed church at St Mary's, Walberton and the conservation area.
- Harm to the amenity value of the adjacent allotments in terms of visual impact and noise; and
- Highway safety concerns due to the interaction of pedestrians and vehicles especially when all entering or leaving at a similar time.

Four letters of support stating the following:

- The existing church building on the site needs to be replaced.
- The existing facilities at Yapton including the village hall are too small.

- The site is conveniently located and has plenty of space for parking.
- The Travel Plan is positive.
- There is a need for Christian worship places to accommodate increased demand from housebuilding.
- The building has been well designed to be in keeping with the semi-rural setting.
- The landscaping will add to the biodiversity gain; and
- The additional space in the building will allow for education and community events.

COMMENTS ON REPRESENTATIONS RECEIVED:

Where the objections relate to material planning considerations, they are addressed in the conclusions section. The following points should be noted:

- The condition requested by the Parish Council would not be reasonable as it could prevent the permission from being implemented (as this would depend on the Treatment Works being upgraded). A pre-commencement foul condition would be reasonable and proportional.
- The northern site boundary is some 330m from the edge of the conservation area and some 530m from the curtilage of St Mary's Church. This distance along with intervening tree screening is sufficient to ensure no harm to the setting of either; and
- The allotments are owned by the applicant; they are already in proximity to several industrial uses but there is a screen of trees between the allotments and the site. The submitted Noise Impact Assessment demonstrates no potential for sound leakage from the church building.

The letters of support are noted although none are residents of Walberton or Yapton.

CONSULTATIONS

CONSULTATION RESPONSES RECEIVED:

SOUTHERN WATER - state that additional network reinforcement work is required however advise no objection subject to a standard foul drainage condition.

WSCC DRAINAGE - initially objected due to no drainage strategy and non-compliance with the NPPF and NPPG.

WSCC FIRE & RESCUE - no objection subject to a fire hydrant condition.

WSCC HIGHWAYS - no objections subject to conditions to secure the implementation of the Travel Plan, secure cycle parking and a construction management plan. Also request that a travel plan monitoring fee be secured by legal agreement. State:

- The access is 8m wide and provides 120m visibility in either direction.
- The speed survey determined 85th percentile speeds of 39mph northbound and 42mph southbound and therefore, no issues with the visibility.
- The access road is approximately 4.3m wide but narrows in two places and this could cause an issue if cars were to pass each other.
- No recorded incidents at the location of the access.
- The applicant has suggested the maximum number of trips is estimated at 180 two-way which would also assume that each car would have 2 or more people sharing.
- A steady flow of trips arriving could see 3 vehicle movements a minute. As most movements will come from the south, (based on information supplied by the church) these will generate left turn in movements, with a small proportion making a right turn into the site. The reverse will occur on departure.

- WSCC acknowledge there will be an increase in trips, however the number of vehicles using Yapton Lane daily is low at around 6,476 two-way vehicles a day.
- Busier times of day may cause some inconvenience in terms of waiting however, these make up a small number of overall movements, and are likely to occur outside of peak hours.
- Additionally, when people are leaving the site and making right hand turn movements, most of the waiting will be kept within the confines of the site and not the public highway.
- No concerns with the parking provision; and
- Request consideration of a link to the existing off-site footpath.

WSCC MINERALS & WASTE - state no objection on the basis this is previously developed land.

ADC ENVIRONMENTAL HEALTH - initially requested clarification on the use of air conditioning.

ADC ECOLOGY - no objection subject to conditions. On-site BNG should be secured by legal agreement.

ADC ECONOMIC DEVELOPMENT - concerned the proposal may result in conflict with the industrial estate businesses but state it is difficult to object given the existing use by the church.

ADC TREE OFFICER - advises no objection subject to a tree protection condition:

- No Arboricultural Method Statement (AMS) along with a Tree Protection Plan (TPP) has been submitted but the Tree Assessment Plan does assist in understanding the implications for retained trees.
- The vast majority of trees along the wooded northern boundary are off-site and so expected to be retained.
- With so few trees within the site, there are few opportunities for conflict between trees and any construction; and
- Those trees should be retained and afforded sufficient room to allow future growth without constraint, subject to their pruning history and condition.

ADC LANDSCAPE OFFICER - states no objection and advises the submitted landscape plan has sufficient detail such that there is no need for a condition.

COMMENTS ON CONSULTATION RESPONSES:

Comments noted except as discussed below:

WSCC DRAINAGE - a revised Drainage report was received (July 2024). WSCC reviewed this but maintained their objection. The applicant provided written responses to the outstanding points and WSCC have now stated no objection as the additional information means the strategy is now accords with the NPPF and local policies. They recommend conditions.

WSCC HIGHWAYS - the applicant amended the site plan to widen the two pinch points on the access and provide a passing place. No plans have been taken forward regarding a link to the public footpath to the North as given the locations from where most people are accessing the Church (as per the map on page 16 of the Design and Access Statement), this would have limited benefit but would require the loss of part of the northern hedge and trees which would affect biodiversity.

ADC ENVIRONMENTAL HEALTH - the applicant advised that no air conditioning was proposed but that there is potential for Mechanical ventilation with heat recovery (MVHR) to be installed which would supply fresh air into the rooms. Environmental Health comments stated no objection subject to conditions ref noise management.

ADC ECONOMIC DEVELOPMENT - it is noted the applicant also owns the industrial estate and so retains control over the whole site. It would not make economic sense to develop part of an owned site which then led to harm to another part of the same ownership.

POLICY CONTEXT

Designations applicable to site:

- Outside the Built-Up Area Boundary (BUAB).
- Current/Future Flood Zone 1.
- Medium groundwater flood risk.
- No known surface water risk.
- Lidsey Treatment Catchment Area.
- Area of Special Control (Adverts).
- Sharp Sand & Gravel WSCC Mineral Consultation Area.
- CIL Zone 3.
- Public Right of Way ref WAL/328/1 to the north (outside the site).
- WNDP designated Biodiversity Corridor on the northern edge of the allotments to the north of the site; and
- Grade 1 Agricultural Land as per the 1988 Agricultural Land Classification mapping.

DEVELOPMENT PLAN POLICIES

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

CSP1	C SP1 Countryside
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
ENVDM5	ENV DM5 Development and biodiversity
QEDM1	QE DM1 Noise Pollution
QEDM2	QE DM2 Light pollution
QESP1	QE SP1 Quality of the Environment
SDSP1	SD SP1 Sustainable Development
SDSP2	SD SP2 Built-up Area Boundary
SODM1	SO DM1 Soils
TDM1	T DM1 Sustainable Travel and Public Rights of Way
TSP1	T SP1 Transport and Development
WDM1	W DM1 Water supply and quality
WDM2	W DM2 Flood Risk
WDM3	W DM3 Sustainable Urban Drainage Systems

[Joint Minerals Local Plan 2018:](#)

[Walberton Neighbourhood Plan Policy 2019-2031 VE3](#)

Walberton Neighbourhood Plan Policy 2019-2031

Joint West Sussex M9 Safeguarding Minerals

Protection of Trees and Hedgerows

Surface Water Management

VE7

Walberton Neighbourhood Plan Policy 2019-2031 'Unlit village' status

VE8

Walberton Neighbourhood Plan Policy 2019-2031 7 Biodiversity Corridors

VE10

Walberton Neighbourhood Plan Policy 2019-2031 Built up boundary (BUAB)

HP1

Walberton Neighbourhood Plan Policy 2019-2031 Design Guidance

HP13

Walberton Neighbourhood Plan Policy 2019-2031 Traffic Management

GA5

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 Walberton Neighbourhood Development Plan (WNDP) was made in July 2021 and its policies are referred to 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 conflicts with the development plan in that it would result in inappropriate development outside of the defined settlement boundary and the loss of high quality agricultural land.

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 other material considerations to be weighed in the balance with the Development Plan and these are discussed in the conclusions section below.

BIODIVERSITY NET GAIN

This application is liable for Biodiversity Net Gain (BNG) and on-site BNG is proposed in the form of 0.27 Habitat Units comprising mixed scrub & new trees (10.08%) and 1.27 hedgerow units comprising non-native/ornamental hedgerow (76m long) around the car park and native hedgerow (200m long) to the southern and western boundaries (518.79%). This would need to be secured by a section 106 legal agreement.

CONCLUSIONS

PRINCIPLE OF DEVELOPMENT:

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The site is outside of the BUAB in the ALP and the WNDP with the closest area of BUAB being 430m to the north (Walberton).

ALP policy C SP1 states development in the countryside outside the BUAB will not be permitted unless it is for a specific development type or accords with other policies in the Plan. None of these relate to the proposal and the proposal conflicts with the ALP. The WNDP was made in July 2021 and policy HP1 maintains that development in the countryside is inappropriate unless for a form of development in accordance with ALP policy C SP1 so there is conflict with the WNDP policy. It would not be appropriate to refuse on the basis of the policy conflicts unless there is corresponding harm arising from the countryside location.

There are no policies in the ALP or WNDP that support new churches or community facilities. The Arun Design Guide (ADG) states "Chapels, schools and churches are often located in neighbourhood or village centres". As the development plan is silent, paragraph 11(d) of the NPPF is engaged and this states permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. It is also material that para 88(d) of the NPPF supports places of worship in the rural area as long as the facility is accessible.

ALP Policy T DM1 states new development must (a) be located within easy access of established public transport service(s), existing pedestrian and cycle networks, and the green infrastructure network which links the development with key destinations. Although outside of the BUAB, the application site is still relatively accessible as it is possible to walk (predominantly using footpaths) or cycle from Walberton and cycle from Barnham and Yapton. The application is accompanied by a Travel Plan which supports and encourages sustainable and active travel.

MINERALS SAFEGUARDING:

The site is located in a Sharp Sand and Gravel Mineral Safeguarding Area as defined by the West Sussex Joint Minerals Local Plan (JMLP). Policy M9(b) states that proposals for non-mineral development within the Minerals Safeguarded Areas will not be permitted unless: (i) Mineral sterilisation will not occur; or (ii) it is appropriate and practicable to extract the mineral prior to the development taking place, or (iii) the overriding need for the development outweighs the safeguarding of the mineral and it

has been demonstrated that prior extraction is not practicable or environmentally feasible.

The applicant has not provided any mineral resource assessment or attempted to respond to this policy. The site's development will prevent future extraction of the mineral and there is no planning policy-based need for the facility. The site access is unlikely to be suitable for heavy plant and passes close to residential properties. It would not be environmentally feasible to extract minerals prior to development. It is material that WSCC Minerals and Waste have advised no objections.

AGRICULTURAL LAND:

The 1988 Agricultural Land Classification Provisional (England) dataset from Defra suggests this land is likely to be grade 1 (best and most versatile). However, the site is not currently used for agriculture and is not directly connected to agricultural land (although there is arable land nearby). Historic aerial photography dating back to 1991 shows no evidence of a previous arable use of the land.

Arun Local Plan policy SO DM1 states that the use of grades 1, 2 and 3a of the Agricultural Land Classification for any form of development not associated with agriculture, horticulture or forestry will not be permitted unless need for the development outweighs the need to protect such land in the long term. There are no agricultural land policies in the WNDP.

It is clear by the letters of support received that there is a pressing need for a new facility in this area to serve the existing church. This need is not supported by any planning policy requirement and the application documents do not attempt to make a case for the new Church facilities. It is unclear which church the building relates to. The supporting Design & Access Statement (DAS) states the land has previously been used for activities related to the Yapton Free Church (which the Marquee was proposed in association with), and it is known that their church building is much smaller than the area of the church hall now proposed. The application drawings refer to "The River of Living Water/Yapton Free Church" with the former understood to be a small Christian charity organisation.

There is no clear need for the church and it is not possible to comply with policy SO DM1. Given the characteristics of the land, the lack of any previous agricultural use, the lack of connectivity with adjacent agricultural land and the use of the land by church activities, there is little likelihood of the land being farmed in the future. This weighs against the sustainability of a refusal on grounds of agricultural land.

FLOODING & SURFACE WATER DRAINAGE:

The site is in Flood Zone 1 and is at very low risk of flooding from rivers and seas. The site is at medium risk of groundwater flooding but low risk of surface water flooding. The site is in the Lidsey Treatment catchment area.

ALP policy W DM2 refers to flood risk, the sequential/exception tests and mitigation measures. Policy ECC SP1 states development must be located & appropriately designed to adapt to impacts arising from climate change such as the increased probability of tidal and fluvial flooding. ALP policy W DM3 states all development must identify opportunities to incorporate a range of Sustainable Urban Drainage Systems (SuDS) as appropriate to the size of development. WNDP policy VE7 requires new development make appropriate provision for accommodating the surface water arising from the development.

The applicant initially just submitted a Flood Risk Assessment (FRA) which essentially just extolled the afore mentioned low risk of flooding. Subsequently (in response to the objection by County Drainage), a full "Flood Risk Assessment and Drainage Strategy Report" was provided which includes roof rainwater harvesting, permeable surfacing, and a pond/detention basin. As set out elsewhere, this strategy has been assessed by WSCC and found to be in accordance with the relevant policies.

FOUL DRAINAGE:

The site is in the Lidsey Wastewater Treatment Catchment Area. ALP policy W DM1 states all development must demonstrate that adequate drainage capacity exists or can be provided as part of the development. Applications must be accompanied by a Drainage Impact Assessment (DIA) that takes account of both the individual and cumulative impact upon foul water disposal, flood storage capacity and surface water drainage or flood flows within the Lidsey area. There is no relevant WNDP policy.

The application states that sewage will be drained to a private wastewater treatment plant a maximum daily Biological Oxygen Demand capacity of 9kg. The system will discharge to the proposed pond through a reed bed as a tertiary treatment method. Southern Water (SW) commented that the existing foul sewage network needs reinforcement and request a condition. However, SW appear to have missed that no connection to the foul sewer is proposed. Notwithstanding, a condition would still be required to secure the details of the wastewater treatment plan and reed bed.

The applicant has not provided a DIA and there is some conflict with policy W DM1 however, it is clear that the proposal will not drain to the existing foul sewage network so will not have any impact on the Lidsey Wastewater Treatment. The weight to be afforded to this conflict is very low.

TRAFFIC & ROAD SAFETY:

ALP policy T SP1 seeks to ensure development provides safe access onto the highway network; contributes to highway improvements (where appropriate) and promotes sustainable transport. Schemes should accommodate the efficient delivery of goods and supplies; give priority to pedestrian and cycle movements, be accessed by high quality public transport facilities, create safe and secure layouts for traffic, cyclists and pedestrians and provide appropriate levels of parking. WNDP policy GA5 seeks to resist the increase in traffic through the village.

Para 114 of the NPPF states: "In assessing ... specific applications for development, it should be ensured that: (b) safe and suitable access to the site can be achieved for all users". Para 115 states: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

The concerns of the Parish regarding pedestrian safety are noted but it is material that the NPPF places a high threshold on the level of impact that would be unacceptable. In practice, this means that it is very difficult to sustain a highway related refusal at appeal, particularly one concerning a localised impact. It is also material that the application suggests there will be little pedestrian movements to/from the site with most visitors coming from further afield. Furthermore, the pedestrian route to the site is not particularly attractive as it involves a footpath through the trees running parallel to Yapton Lane that is uneven and soft underfoot. This path then terminates just north of Spindlewood, and it is necessary to walk a short distance on the road at this point to reach the site entrance.

WSCC Highways raise no objection to access arrangements, parking provision, or the impact on the highway network. They advise the proposal may result in an increase in waiting times at the access, but this will be outside peak hours and will not result in a severe impact. They support the Travel Plan Statement which will encourage alternative means of transport to the site and vehicle sharing.

The Arun Parking Standards SPD does not contain any guidance on parking for churches and so this would instead be agreed with WSCC Highways (who raise no objections). All of the standard parking spaces are 2.5m by 5m as per the ADG requirements and the scheme also includes 6 accessible spaces

(versus the requirement for 5 spaces).

On the basis of the above, the proposal complies with the relevant development plan policies and guidance.

DESIGN AND CHARACTER:

ALP policies D SP1 and D DM1 require development make the best possible use of land by reflecting or improving on the character of the site/surrounding area. WNDP policy HP13 states new development must be high quality and contribute to local character by creating a sense of place appropriate to its location.

The ADG only includes guidance for churches in respect of building conversion. Section Q (pages 130-131) is relevant to all rural development. This requires that development integrate with the landscape setting and use a simple & unobtrusive design. New development should comprise a rectangular floor plan and pitched or half-hipped roof. Facades, elevations, and boundaries should be reflective of their rural context, in which the visual impact of buildings is often greater than those in urban areas. Elevational style and layout should generally be kept simple to avoid crowded facades and arrangements. Boundaries should be defined by hedgerows/planting in combination with walls, fencing and railings.

The design as presented follows the guidance in the ADG, which is positive. The site is not visible from Yapton Lane due to intervening development (the houses at Spindlewood). The existing high hedging, and trees to the northern boundary also screen the site from the adjacent allotments and public footpath whilst there are existing buildings to the south and west. The application also proposes an ambitious landscaping scheme which will green and soften the appearance of the site. This will be particularly beneficial to views of the site from the new houses to the east. On this basis there will only be very localised harm to local character.

The layout, scale and architectural treatment of the scheme is acceptable and in accordance with the relevant policies. It is also positive that the internal layout includes a Changing Places Toilet as per the council's informal guidance note "Changing Places Toilets Guidance".

RESIDENTIAL AMENITY:

ALP policy D DM1 requires there be minimal impact to users and occupiers of nearby property and land. Policy QE SP1 requires development contribute positively to the quality of the environment and ensure it does not have a significantly negative impact on residential amenity. Policy QE DM1 states new noise generating development must provide a noise assessment. The ADG sets out the guidance on interface distances between residential properties but does not refer to the need for a particular distance between a dwelling and a non-residential building.

The proposed building will be sited far enough away (approx. 100m) from the new houses on Spindlewood and some 78m from the dwelling, The "Lazy W" (occupied by the applicant) so as not to generate overlooking or loss of light issues. Its use and that of the car park has the potential to give rise to noise/disturbance which may adversely affect the amenity of the nearby houses, but it is positive that significant buffer planting is proposed to the eastern edge.

In addition, church services will predominantly occur on Sunday (which is typical) and noise from the car park will be limited to arrival and departure times. The parking spaces will be at least 25m away from the nearest existing houses, with the closest entrance to the carpark at 15m from the nearest houses. The Noise Impact Assessment confirms there will be no impact at night and that impact from car door slam

noise is expected to be commensurate with the lowest observed adverse effect level (LOAEL).

The Noise Assessment advises that worship music breakout levels at nearby receptors will not exceed the background noise climate during the quietest times of potential use of the church. Where source levels are so limited, impact would be commensurate with the LOAEL. Environmental Health raise no objection subject to conditions and the scheme is acceptable in this regard.

LIGHT POLLUTION:

ALP Policy QE DM2 sets out restrictions and conditions on new lighting proposals. WNDP policy VE8 states that new lighting will be required to conform to the highest standard of light pollution restrictions in force at the time. Security and other outside lighting on private and public premises will be restricted or regulated to be neighbourly in its use.

The application states that there is no finalised lighting plan yet but that the eventual scheme will integrate this into the scheme whilst ensuring no negative impact to the nearby residential dwellings. A condition will be imposed to control lighting and also ensure this eventual scheme is bat friendly.

TREES & LANDSCAPE:

ALP policy D DM1 requires developments to incorporate new tree planting and to improve on character through landscaping. Policy ENV DM4 states TPO protected trees, those in ancient woodland, in a Conservation Area or trees that contribute to local amenity should not be damaged or felled unless the development meets the certain criteria including that the benefits outweigh the loss of trees or woodland. WNDP policy VE3 refers to the need to protect trees.

The supporting Tree Survey & Arboricultural Impact Assessment identifies some 50 individual trees, 1 tree group and two hedgerows as present on the site. Two of the individual trees are to be removed as they are U category and unsuitable for long term retention due to their condition. All other trees will be retained, and no pruning works are proposed. The submitted landscape plan then specifies the planting of 54 new trees and this will easily compensate for the lost trees. Therefore, this aspect is acceptable.

Some retained trees will be subject to hard surfacing works in or near to their Root Protection Areas (RPAs). The application states a no dig method will be used which will incorporate a "cellweb" layer a minimum of 100mm deep, backfilled with clean angular gravel, and a permeable final surface.

The council's Tree Officer raises no objections. The proposed tree loss and new tree planting is acceptable and satisfies the relevant planning policies.

BIODIVERSITY:

ALP policy ENV DM5 states development schemes shall seek to achieve a net gain in biodiversity and protect habitats on site. WNDP policy VE10 2020 states proposals will not be supported where there is evidence that the proposals would significantly harm biodiversity. It also advises that where proposals will have an impact on Biodiversity rich habitats, a management plan shall be provided. There is a WNDP designated Biodiversity Corridor on the northern edge of the allotments to the north of the site, but this is 45m from the edge of the site with allotments in between. The site is not within the 12km buffer of the Singleton and Cocking Tunnels Special Area of Conservation.

The application includes a "Preliminary Ecological Appraisal" (PEA), a separate Biodiversity Net Gain Assessment (BNGA) and a copy of the BNG Metric. The PEA advises that the proposed works will retain all linear features on site and will incorporate additional species-rich planting with flowering and fruiting

species which in turn will increase foraging resources for bats on site. As such, the proposed works will have a likely positive impact on bats at the local level. Provided all construction holes are secured and the two trees to be felled are checked for birds' nests then no other impacts to wildlife are identified.

The council's Ecologist has reviewed the documents and advises no objections subject to conditions. No further surveys are requested. The PEA sets out proposed enhancements in the form of bat boxes, bird nesting boxes, and new planting. In respect of BNG, the scheme will deliver 0.27 new Habitat Units comprising mixed scrub & new trees (a net gain of 10.08%) and 1.27 new hedgerow units comprising non-native/ornamental hedgerow (76m long) around the car park and native hedgerow (200m long) to the southern and western boundaries (518.79%). These measures will be secured by a s106 legal agreement to include a 30-year monitoring regime.

The proposal is in accordance with the relevant development plan policies.

CLIMATE CHANGE:

ALP policies ECC SP1 and SP2 requires all new residential and commercial development be energy efficient, designed to adapt to impacts arising from climate change, and incorporate decentralised, renewable, & low carbon energy supply systems. The submitted DAS includes a sustainability statement which proposes the use of Air Source Heat Pumps, Electric Vehicle Charging points and the use of modern ventilation/air tightness standards. Conditions can be imposed to secure the details of these. Such conditions would ensure compliance with the policies.

SUMMARY:

This report identifies that the proposal is in conflict with the development plan policies in respect of development in the countryside, and the loss of important agricultural soils. However, there are material considerations in the case of the soil issues that would make it difficult to justify a refusal. It is also not appropriate to simply refuse on the basis of inappropriate development in the countryside unless there is corresponding harm arising from that location and given the above, this report identifies none.

The application will deliver a new church to assist with demand for the existing facilities in Yapton. It is a well-designed scheme, and the landscaping and biodiversity net gain enhancements are clear benefits which will have a positive impact on the site and immediate surroundings.

The adverse impacts identified do not significantly and demonstrably outweigh the benefits and there is no conflict with other policies in the NPPF. The recommendation is for Planning Committee to delegate to the Group Head of Planning in consultation with the Chair or Vice Chair with authority to:

- (a) Grant full planning permission subject to conditions; and
- (b) Subject to a Section 106 Agreement, the terms of which are substantially in accordance with those set out in this report with any minor amendments authorised by the Group Head of Planning.

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.

SECTION 106 DETAILS

This application would be subject to a s106 legal agreement relating to the provision & long term monitoring of the proposed on-site Biodiversity Net Gain; and a Travel Plan monitoring fee of £1,635.

CIL DETAILS

This application is not CIL liable.

RECOMMENDATION

APPROVE CONDITIONALLY SUBJECT TO A SECTION 106 AGREEMENT

- 1 The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby approved shall be carried out in accordance with the following approved plans:

- Location plan 04-A-LOC Rev A.
- Proposed Site Plan 05-A-SITE Rev E.
- Proposed floor plans 01-A-PP Rev C.
- Proposed elevations 02-A-ELEV.
- Proposed section and roof plan 03-A-PP Rev A; and
- Landscape Strategy Plan M433-200 Rev P1.

Reason: For the avoidance of doubt and in the interests of amenity and the environment in accordance with Arun Local Plan policies C SP1, D DM1, QE SP1 and T SP1.

- 3 The building shall be used as a place of worship with ancillary education and community uses and for no other purpose (including any other purpose in Class F1 of the Schedule to the Town & Country Planning (Use Classes) Order 1987 (as amended) or in any provision equivalent to that Class in any other Statutory Instrument revoking and re-enacting that Order).

Reason: To enable the Local Planning Authority to maintain control in the interests of the amenities of the area in accordance with Arun Local Plan policies D DM1 and QE SP1.

4 No development shall take place, (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), until a Construction & Environmental Management Plan and accompanying Site Setup Plan has been submitted to and approved in writing by the Local Planning Authority (who shall consult with National Highways, WSCC Highways, the council's Environmental Health Officer and Ecologist as appropriate). Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. This shall require the applicant and contractors to minimise disturbance during demolition and construction and will include (but not be limited to) details of the following information for approval:

1. The phased programme of construction works.
2. The anticipated, number, frequency, types, and timing of vehicles used during construction (construction vehicles should avoid the strategic road network during the peak hours of 0800-0900 and 1700-1800 where practicable).
3. The preferred road routing for all construction traffic associated with the development.
4. Provision of wheel washing facilities (details of their operation & location) and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulations Orders).
5. Details of street sweeping.
6. Details of a means of suppressing dust & dirt arising from the development.
7. A scheme for recycling/disposing of waste resulting from demolition and construction works (i.e., no burning permitted).
8. Details of all proposed external lighting to be used during construction (including location, height, type & direction of light sources and intensity of illumination).
9. Details of areas for the loading, unloading, parking, and turning of vehicles associated with the construction of the development.
10. Details of areas to be used for the storage of plant and materials associated with the development.
11. Details of the temporary construction site enclosure to be used throughout the course of construction (including access gates, decorative displays & facilities for public viewing, where appropriate).
12. Contact details for the site contractor, site foreman and CDM co-ordinator (including out-of-hours contact details).
13. Details of the arrangements for public engagement/consultation both prior to and continued liaison during the construction works.
14. Details of any temporary traffic management that may be required to facilitate the development including chapter 8 traffic signage.
15. Measures to minimise the noise (including vibration) generated by the construction process to include hours of work, proposed method of piling for foundations, the careful selection of plant and machinery and use of noise mitigation barrier(s).

Details of how measures will be put in place to address any environmental problems arising from any of the above shall be provided. A named person shall be appointed by the applicant to deal with complaints, shall be available on site and their availability made known to all relevant parties.

No demolition/construction activities shall take place other than from 08:00 hours until 18:00 hours (Monday to Friday) and from 08:00 hours until 13:00 hours (Saturday) with no work on

Sunday or Bank/Public Holidays.

Reason: In the interests of the safety/amenity of nearby residents & occupiers of any nearby noise sensitive premises, the safety & general amenities of the area, and in the interests of highway safety in accordance with policies D DM1, QE SP1, QE DM1, QE DM2, QE DM3 and T SP1 of the Arun Local Plan and the NPPF. This is required to be a pre-commencement condition because it is necessary to have the construction site set-up agreed prior to access by construction staff.

- 5 Prior to commencement of development, construction drawings of the surface water drainage network, associated sustainable drainage components and flow control mechanisms and a construction method statement shall be submitted and agreed in writing by the Local Planning Authority. The scheme shall then be constructed as per the Flood Risk Assessment and Drainage Strategy (prepared by Nimbus Engineering Consultants, July 2024, Ref. C3314-R1-REV-A) and Drawing C3314-03-A Surface Water Drainage and SuDs Layout (prepared by Nimbus Engineering, July 2024) and remaining in perpetuity for the lifetime of the development unless agreed in writing by the Local Planning Authority. No alteration to the agreed drainage scheme shall occur without prior written approval from the Local Planning Authority.

Reason: To ensure that the proposed development is satisfactorily drained in accordance with policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan and the NPPF, by ensuring the satisfactory management of local sources of flooding surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development. This is required to be a pre-commencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works.

- 6 Prior to the commencement of construction works details of a proposed foul drainage system shall be submitted to and approved in writing by the Local Planning Authority (including details of its siting, design, and subsequent management / maintenance) and no dwelling shall be occupied until works for the disposal of sewage have been fully implemented in accordance with the approved details.

Reason: To ensure that the proposed development has a satisfactory means of disposing of foul sewerage in accordance with policies W DM1 and W DM3 of the Arun Local Plan. This is required to be a pre-commencement condition because it is necessary to implement the foul water drainage system prior to commencing any building works.

- 7 No development shall take place until a Reptile Mitigation Strategy addressing the mitigation and translocation of reptiles has been submitted to and approved in writing by the Local Planning Authority. The Reptile Mitigation Strategy shall include the following:

1. Purpose and conservation objectives for the proposed works.
2. Review of site potential and constraints.
3. Detailed design(s) and/or working method(s) to achieve stated objectives.
4. Extent and location/area of proposed works on appropriate scale maps and plans.
5. Type and source of materials to be used where appropriate, e.g., native species of local provenance.
6. Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.
7. Persons responsible for implementing the works.
8. Details of initial aftercare and long-term maintenance of the Receptor area(s).
9. Details for monitoring and remedial measures.

10. Details for disposal of any wastes arising from works.

The Reptile Mitigation Strategy shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.

Reason: To allow the Local Planning Authority to discharge its duties under the Wildlife & Countryside Act 1981 (as amended), s40 of the Natural Environment and Rural Communities Act 2006 (Priority habitats & species), and Arun Local Plan policy ENV DM5. This is required to be a pre-commencement condition as otherwise there would be a risk of harm to protected species and their habitat.

- 8 No development including site access, demolition or associated construction activities shall commence unless and until all the existing trees/bushes/hedges to be retained on the site have been protected in accordance with an Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) which has been submitted to, and approved by the Local Planning Authority prior to commencement of the above listed activities (site access, demolition or associated construction activities).

Reason: To ensure the retention and maintenance of trees and vegetation which are an important feature of the area in accordance with Arun Local Plan policy ENV DM4. This is required to be a pre commencement condition because it is necessary to ensure that trees are fully protected before the ground is disturbed and works commence.

- 9 Prior to the commencement of the development, a Noise Management Plan (NMP) shall be submitted to and approved in writing by the Local Planning Authority. The NMP shall provide details as appropriate, including but not necessarily restricted to, the following matters:

1. Hours of operation
2. Management responsibilities during operating hours
3. Measures to control noise from activities and operations at the site (including the operation of any equipment plant or building services)
4. Minimising noise from vehicles, deliveries, and servicing.

The NMP shall be regularly reviewed to ensure that it reflects current operational site practices. Where the operator or the Local Planning Authority receives complaints or have concerns that site activities or operations are having or may have a detrimental impact to the local amenity, the NMP shall be reviewed. Any changes to the NMP necessary to address these concerns shall be implemented to the satisfaction of the Local Planning Authority.

The applicant should review the Planning Noise Advice Document - Sussex, November 2023: <https://www.arun.gov.uk/download.cfm?doc=docm93jjm4n19846.pdf&ver=24686>

Reason: To protect the amenity of local residents in accordance with the Arun Local Plan policy QE SP1. This must be a pre-commencement condition because it is necessary to have such measures in place before the construction phase commences.

- 10 Prior to any development above damp-proof course (DPC) level, a Biodiversity Enhancement Strategy for protected and Priority species shall be submitted to and approved in writing by the Local Planning Authority. The Biodiversity Enhancement Strategy shall be in accordance with the recommendations of the submitted Preliminary Ecological Appraisal (07/12/23) and include the following:

1. Purpose and conservation objectives for the proposed enhancement measures.
2. Detailed designs to achieve stated objectives.

3. Locations, orientations, and heights of proposed enhancement measures by appropriate maps and plans (where applicable).
4. Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.
5. Persons responsible for implementing the enhancement measures.
6. Details of initial aftercare and long-term maintenance (where relevant).

The works shall be implemented in accordance with the approved details prior to occupation and shall be retained in that manner thereafter.

Reason: To enhance protected and Priority species & habitats and allow the Local Planning Authority to discharge its duties under the NPPF and s40 of the Natural Environment and Rural Communities Act 2006 (Priority habitats & species), and in accordance with Arun Local Plan policies: ENV SP1 and ENV DM5.

- 11 No development above damp-proof course (DPC) level shall take place unless and until details of the proposed location of the required fire hydrants have been submitted to and approved in writing by the Local Planning Authority in consultation with West Sussex County Council's Fire and Rescue Service.

Prior to the first occupation of any dwelling forming part of the proposed development, the applicant/developer shall at their own expense install the required fire hydrants (or in a phased programme if a large development) in the approved locations to BS:750 standards or stored water supply and arrange for their connection to a water supply which is appropriate in terms of both pressure and volume for the purposes of firefighting.

The fire hydrants shall thereafter be maintained as part of the development by the water undertaker at the expense of the Fire and Rescue Service if adopted as part of the public mains supply (Fire Services Act 2004) or by the owner/occupier if the installation is retained as a private network.

Reason: In the interests of amenity and in accordance with policy INF SP1 and T SP1 of the Arun Local Plan and in accordance with The Fire & Rescue Service Act 2004.

- 12 The approved details of the landscaping on drawing M433-200 Rev P1 "Landscape Strategy Plan" shall be carried out in the first planting and seeding season, following the occupation of the buildings or the completion of the development, whichever is the sooner, and any trees or plants which, within a period of five years from the completion of development, die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation.

Reason: In the interests of amenity and of the environment of the development in accordance with Arun Local Plan policy D DM1.

- 13 Upon the first use of the Church building, the applicant shall implement the measures incorporated within the approved travel plan rev A (31/01/24). The Applicant shall thereafter monitor, report and subsequently revise the travel plan as specified within the approved document.

Reason: To encourage and promote sustainable transport in accordance with Arun Local Plan policy T SP1.

- 14 No part of the building shall be occupied until a post completion noise survey has been undertaken by a suitably qualified acoustic consultant and the report submitted to and

approved in writing by the Local Planning Authority. The post completion testing shall demonstrate that the mitigation measures set out in 5.1 of the Noise Impact Assessment by Venta Acoustics dated 05 February 2024 ref VA5103.240131.NIA are implemented and assess the performance of those noise mitigation measures against the noise levels as set out in 4.3 and 5.2 of the report to include an assessment with windows of the development open for ventilation. A method statement shall also be submitted to and approved in writing by the Local Planning Authority prior to the survey being undertaken.

The applicant should review the Planning Noise Advice Document - Sussex, November 2023: <https://www.arun.gov.uk/download.cfm?doc=docm93jjjm4n19846.pdf&ver=24686>.

Reason: To protect the amenity of local residents in accordance with Arun Local Plan policy QE DM1.

15 The development hereby approved shall not be first occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:

1. A timetable for its implementation,
2. Details of SuDS features and connecting drainage structures and maintenance requirement for each aspect,
3. A management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan.

16 Upon completion of the surface water drainage system, including any SuDS features, and prior to the first occupation of the development; a survey and report from an independent surveyor shall be submitted to and approved in writing by the Local Planning Authority. The survey and report shall demonstrate that the surface water drainage system has been constructed in accordance with the details approved pursuant to condition 1. Where necessary, details of corrective works to be carried out along with a timetable for their completion, shall be included for approval in writing by the Local Planning Authority. Any corrective works required shall be carried out in accordance with the approved timetable and subsequently re-surveyed with the findings submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and policies W SP1, W DM1, W DM2 and W DM3 of the Arun Local Plan.

17 Prior to any part of the new development being first brought into use/occupied, a bat friendly Lighting Plan shall be submitted to and approved in writing by the Local Planning Authority. The recommended lighting specification shall use LED's (at 3 lux) with the recommended

spectrum being 80% amber and 20% white with a clear view, no UV, a horizontal light spread of less than 70 degrees and a timer. A 3D plan of the illumination level should be supplied so that the Local Planning Authority can assess the potential impact on protected species.

Reason: To allow the Local Planning Authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended), and s40 of the Natural Environment and Rural Communities Act 2006 (Priority habitats & species) and Arun Local Plan policy ENV DM5.

- 18 No part of the development shall be first occupied until covered and secure cycle parking spaces have been provided in accordance with plans and details to be submitted to and approved in writing by the Local Planning Authority. The spaces so provided shall be retained in perpetuity.

Reason: To provide alternative travel options to the use of the car in accordance with Arun Local Plan policy T SP1.

- 19 The approved development shall achieve a minimum of 10% energy supply reduction from either the use of decentralised/renewable or low carbon energy sources (as described in the glossary at Annex 2 of the NPPF). Any physical features that are required as part of the works must be installed prior to the occupation of each dwelling/the building and shall be thereafter permanently maintained in good working condition.

Reason: In order to secure a reduction in on site energy use in accordance with Arun Local Plan policy ECC SP2 and the NPPF.

- 20 Prior to the occupation of any part of the approved building, the applicant or developer shall provide electric vehicle charge points to serve the parking spaces associated with the approved building in accordance with the council's standards as set out in its Parking Standards SPD. This requires EV charging points in 30% of parking spaces (rising to 50% from 2028 & 100% from 2033) with electric ducting provided to all other spaces. to provide passive provision for these spaces to be upgraded in future. The individual charge points shall be in accordance with the technical requirements set out in Part S, section 6.2 of the Building Regulations 2010 (as amended). The electric vehicle charge points shall thereafter be retained and maintained in good working condition.

Reason: To mitigate against adverse impacts on local air quality and to promote sustainable travel, in accordance with Arun Local Plan policy QE DM3(c), the Arun Parking Standards SPD and the NPPF.

- 21 The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition (the biodiversity gain condition) that development may not begin unless:
- (a) A Biodiversity Gain Plan has been submitted to the planning authority, and
 - (b) The planning authority has approved the plan.

This permission will require the submission and approval of a Biodiversity Gain Plan before development is begun.

For guidance on the contents of the Biodiversity Gain Plan that must be submitted and agreed by the Council prior to the commencement of the consented development please see the link: <https://www.gov.uk/guidance/submit-a-biodiversity-gain-plan>

- 22 INFORMATIVE: Statement pursuant to Article 35 of the Town and Country Planning

(Development Management Procedure) (England) Order 2015 (as amended). The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern within the application (as originally submitted) and negotiating, with the Applicant, acceptable amendments to the proposal to address those concerns. As a result, the Local Planning Authority has been able to grant planning permission for an acceptable proposal, in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.

23 INFORMATIVE: This decision has been granted in conjunction with a Section 106 legal agreement relating to the provision & long term monitoring of the proposed on-site Biodiversity Net Gain; and a Travel Plan monitoring fee of £1,635.

24 INFORMATIVE: Following approval of details showing the proposed location of all fire hydrant(s) or stored water supply (in accordance with West Sussex Fire and Rescue Service's Guidance Notes) and prior to the first occupation of any dwelling or unit forming part of the proposed new development you are advised to contact West Sussex Fire and Rescue Service (WSFRS) make them aware of all the fire hydrants for the site and their locations. They can then be operated and tested, their location marked up locally and plotted on the water management system and mapping. This information is then available to all fire crews attending the site, essential for locating the nearest fire hydrants available in the vicinity of a fire without delay.

Without this information WSFRS would not be aware of any fire hydrants available on the site and lead to valuable time being spent looking for a water supply to keep the fire appliance supplied with water. Without a supply of water people's lives and properties could be put at undue risk in the event of a fire. Fire hydrant information is to be sent to either the Planning Officer or directly to the Water and Access Department, WSFRS on the details given below:
Frs.waterandaccess@westsussex.gov.uk

25 INFORMATIVE: Erection of flow control structures or culverting of an ordinary watercourse requires consent from the appropriate authority, which is Arun District Council on behalf of West Sussex County Council. It is advised to discuss proposals for any works at an early stage of proposals.

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)

WA/29/24/PL - Indicative Location Plan (Do not Scale or Copy)
(All plans face north unless otherwise indicated with a north point)



Based on the Ordnance Survey mapping with permission of the Controller of Her Majesty's Stationery Office © Crown Copyright.
Unauthorised reproduction infringes Crown Copyright and may lead to prosecution or civil proceedings. Arun District Council
100018487. 2015