



Planning Statement

New Warehouse, Pulborough Garden Centre

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Prepared by: NS

Reviewed by: GM

Alder King Planning Consultants

Pembroke House, 15 Pembroke Road, Clifton, Bristol BS8 3BA

Email: planning.consultancy@alderking.com

Tel: 0117 317 1173



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1.0 Introduction

- 1.1 This planning statement has been prepared by Alder King Planning Consultants on behalf of British Garden Centres in support of a proposed development on land located at Pulborough Garden Centre.
- 1.2 The application is for the erection of a new warehouse building.
- 1.3 The statement provides details of the proposed scheme and includes an assessment of the proposed development against the relevant planning policy framework.

2.0 The Site and Planning History

Site and Surroundings

- 1.5 The development site is located on land to the rear of the established Pulborough Garden Centre located on the A283 Stopham Road, approximately 1km to the west of the built-up area of Pulborough and just inside the boundary of South Downs National Park.
- 1.6 The development site itself extends to 0.69 ha and incorporates the main access for the garden centre and car park. The area directly to the east of the car park currently comprises an area of hardstanding, used as a service yard for the adjacent garden centre as well as storage in container units for other garden centres in the group. The area also houses pallets of bulky goods ahead of display for sale. It therefore comprises previously developed land.
- 1.7 In terms of the context of the site, Pulborough Garden Centre occupies a series of interlinked low-rise buildings and glasshouses with external plant display areas and car parking areas. The garden centre is accessed from a service road which connects directly with the A283 Stopham Road. There is a customer car park adjacent to the main customer entrance to the garden centre buildings and a larger second car park is located to the north of the garden centre which is currently roughly laid to gravel. The application site sits separate to the garden centre buildings and to the east of the car parking area. It is well contained within its own plot and is surrounded by trees on three sides which provide screening.
- 1.8 The wider surroundings to the application site are rural in character, with a mixture of open agricultural land and woodland to the south, east and west. Immediately north of the site is an area of allotments beyond which is more open countryside. To the west of the garden centre is a Grade II Listed private dwelling, Cokehurst. This dwelling is screened from the application site by a tall and dense line of planting which, alongside the existing trees obscures the dwelling from the application site completely.
- 1.9 By virtue of its location and surrounding vegetation, the application site is well screened from surrounding areas and there are no residential properties with immediate views of the site.

Relevant Planning History

- 1.10 Although there are numerous historical and more recent planning applications relating to the garden centre site there are none which specifically refer to the application site.
- 1.11 Planning permission was recently granted for an extension to the existing garden centre, including reconfiguration and resurfacing of the car parking area adjacent to the application site under application ref: SDNP/20/05831.

3.0 The Development Proposals

- 2.1 The proposed development seeks to erect a warehouse building on the site accommodating 558 sqm of floorspace within the B8 use class. The building will be used to store products for the wider British Garden Centres business such as seasonal goods (e.g. Christmas stock) as well as non-seasonal goods. Whilst the building will be located at the Pulborough Garden Centre site, on land within British Garden Centres ownership, it will not be used exclusively in association with Pulborough Garden Centre but to service their other centres in the region as well. Its use will be mostly independent from the adjacent garden centre.
- 2.2 A detailed account of the proposed development is shown on the accompanying plans.

4.0 Planning Policy Context

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise.
- 3.2 This section of the Planning Statement considers the planning policy context relevant to the proposed development as contained in the Development Plan and other policy documents material to the application's determination.
- 3.3 The Development Plan for the site currently comprises the adopted South Downs Local Plan (July 2019). This sets out how the National Park Authority will manage development to 2034.
- 3.4 Other material considerations include the National Planning Policy Framework (the Framework), National Planning Policy Guidance (NPPG), the emerging Neighbourhood Plan and relevant Supplementary Planning Documents, which have varying weight in the decision making process depending on their conformity with the NPPF and advancement in the adoption process.

South Downs Local Plan

- 3.5 The adopted policies map confirms that the site falls outside of the development boundary and is therefore in open countryside and also falls within a 'Minerals Safeguarding Area'. The policies of most relevance to the development proposals are set out below.
- 3.6 Strategic Policy SD4 'Landscape Character' requires development proposals to conserve and enhance landscape character by demonstrating they reflect the context and type of landscape they are located within and the design, layout and scale conserve and enhance existing landscape features.
- 3.7 Strategic policy SD5 'Design' sets out that development proposals will only be permitted where they respect the local landscape character through sensitive and high-quality design that makes a positive contribution to the character and appearance of the area.

- 3.8 Strategic Policy SD6 ‘Safeguarding Views’ states that proposals will only be permitted where they preserve the visual integrity, identity and quality of the National Park. It is important that they do not result in adverse cumulative impacts within views.
- 3.9 Strategic Policy SD7 ‘Relative Tranquillity’ requires that proposals seek to conserve and enhance relative tranquillity within the National Park.
- 3.10 Strategic policy SD8 ‘Dark Night Skies’ states that proposals will be permitted where they conserve and enhance the quality of dark night skies. Proposals must demonstrate that opportunities to reduce light pollution have been taken. Any lighting proposed should meet or exceed the level of protection appropriate in the environmental zone.
- 3.11 Strategic Policy SD9 ‘Biodiversity and Geodiversity’ requires development proposals to conserve and enhance biodiversity and geodiversity.
- 3.12 Development Management Policy SD11 ‘Trees, Woodland and Hedgerows’ advises that development proposals will be permitted where they conserve and enhance trees, hedgerows and woodland.
- 3.13 Strategic Policy SD12 ‘Historic Environment’ states that development proposals will only be permitted where they conserve and enhance the historic environment.
- 3.14 Strategic Policy SD19 ‘Transport and Accessibility’ sets out that development proposals must demonstrate the continued safe and efficient operation of the strategic and local road networks.
- 3.15 Strategic policy SD25 ‘Development Strategy’ defines the settlement boundaries across the National Park Area. Outside of these development boundaries, land will be treated as open countryside. The policy sets out that under certain circumstances, development will be permitted outside of settlement boundaries where it complies with relevant policies in the Local Plan, where it responds to the context of the relevant area and; if it is allocated for development as part of the development plan; or if there is an essential need for a countryside location; or if it is an appropriate reuse of a previously developed site and conserves the special qualities of the National Park.
- 3.16 Strategic policy SD34 ‘Sustaining the Local Economy’ supports proposals that foster the economic and social well-being of local communities provided they meet one of more of a number of criteria. These include providing ‘flexibility for established businesses to secure future resilience and protect local jobs’; ‘support rural supply chains across the National Park and its environs’ and; ‘intensify the commercial use of an employment site and make a more efficient use of brownfield land’
- 3.17 Strategic policy SD48 ‘Climate Change and the Sustainable Use of Resources’ encourages new development to incorporate sustainable design features appropriate to the scale and type of development.

OTHER MATERIAL CONSIDERATIONS

National Planning Policy Framework

- 3.18 The National Planning Policy Framework (NPPF), revised in February 2019, sets out the Government's planning policies for England and seeks to ensure the delivery of sustainable development. The presumption in favour of sustainable development is at the core of the NPPF meaning that Local Planning Authorities should plan positively to meet the development needs of their area and be sufficiently flexible to adapt to rapid change.
- 3.19 Paragraph 7 outlines that the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 3.20 Paragraph 8 identifies that the planning system has three overarching objectives which are interdependent:
- a) An **economic one** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right place and at the right time to support growth, innovation and improved productivity.
 - b) A **social objective** – to support strong, vibrant and healthy communities... with accessible services and open spaces that reflect current and future needs.
 - c) An **environmental objective** – to protect and enhance our natural, built and historic environment.
- 3.21 Paragraph 11 advises that plans and decisions should apply a presumption in favour of sustainable development and that for decision taking this means approving development proposals that accord with an up-to-date development plan without delay.
- 3.22 Paragraph 38 sets out that LPAs should approach decisions on proposed developments in a positive and creative way, working with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Applications should be determined in accordance with the development plan, unless material considerations indicate otherwise (para. 47).
- 3.23 Section 6 of the NPPF focusses on building a strong, competitive economy. Paragraph 81 suggests that significant weight should be placed on the need to support economic growth, taking into account local business needs and wider opportunities for development.
- 3.24 Paragraph 84 says that planning decisions should enable the sustainable growth and expansion of all types of business in rural area, both through conversion of existing buildings and well-designed new buildings.
- 3.25 Paragraph 119 encourages the use of previously developed sites to meet development needs, and paragraph 120 promotes and supports the development of under-utilised land and buildings.

- 3.26 Paragraph 176 places emphasis on the conservation and enhancement of landscape and scenic beauty in National Parks. The conservation and enhancement of wildlife and cultural heritage are also stated to be important considerations which should also be given great weight in National Parks.

Pre-submission Pulborough Neighbourhood Plan

- 3.27 The application site falls within the boundary of the Pulborough Neighbourhood Plan area. Pulborough Parish Council is currently preparing a Neighbourhood Plan which, once adopted, will form part of the development plan for Pulborough and surrounding areas. Having been in production since 2013, the plan has been consulted on several times and is currently at the 'Submission Draft' stage. At the time of writing, the plan has just undergone a further round of consultation (July 2021).
- 3.28 It is noted that Policy 9 of the plan, Pulborough Garden Centre, covers the application site area and is supportive of development to intensify or to extend the existing garden centre and the facilities of its ancillary uses, subject to several criteria. These include ensuring that proposals have regard to conserving the natural beauty, wildlife and cultural heritage of the National Park, and ensuring the proposals are of a suitable massing and height.

5.0 Planning Assessment

Planning Considerations

- 4.1 This application seeks planning permission for the erection of a warehouse building on land to the rear of an established garden centre which is currently used as a storage/service yard occupied by storage containers and pallets of bulky goods. It is intended that the warehouse will be utilised by British Garden Centres to store both seasonal and non-seasonal goods for their garden centres across this region. It will not solely be used in association with Pulborough Garden Centre, and so should not be seen as ancillary, but will still have a link. The development will help to secure the long term future of the British Garden Centres sites across the region, including the one at Pulborough, and support the local rural economy.
- 4.2 This section of the statement will review the development proposals against the prevailing planning policies contained within the SDLP together with all relevant material considerations. The key planning considerations in this instance are:
- The principle of the proposed development
 - Design, landscape and visual impact
 - Sustainability principles
 - Ecology
 - Highways, access and parking
 - Lighting and Noise
 - Flooding
 - Heritage/Archaeological Considerations

Principle of Development

- 4.3 As set out above, the application site is located within the wider Pulborough Garden Centre site and comprises previously developed land. It is within the development curtilage of the existing garden centre buildings, used as a storage/service yard, and is currently occupied by storage containers and pallets of bulky goods which provide storage for this, and other garden centres.
- 4.4 Planning permission has recently been granted for an extension to the existing garden centre buildings, including an upgrade and resurfacing of the large car parking area adjacent to the site.

- 4.5 The new building would be used for storage and distribution, falling within the B8 use class and would be used by British Garden Centres to service their garden centres in the region, including the one at Pulborough. It is a logical location for erecting a warehouse associated with the business as it is on land already within the applicant's ownership and within the boundary of an established development site. In addition, it is already used for storage and the proposed warehouse building would be a more efficient use of the site and tidy up the appearance compared with the ad hoc storage of goods on the site currently.
- 4.6 The development strategy for the South Downs, as set out within Strategic Policy SD25, seeks to direct new development into existing built up areas, though it does provide that some development may be acceptable where it responds to the context of the area, represents appropriate reuse of existing developed land and where it complies with other relevant policies within the SDNP.
- 4.7 It is clear in this instance that the proposals meet the requirements of Policy SD25. The application site sits within the development curtilage of the wider garden centre site, and so there would be no encroachment onto undeveloped land, and would comprise an appropriate reuse of existing developed land. In addition, the site is well screened from surrounding areas by the existing trees around the boundary and so the development will not impact on the wider context of the area.
- 4.8 Strategic policy 34 confirms that development proposals that foster the economic and social wellbeing of local communities within the National Park will be permitted where they meet one or more of the relevant criteria. In this case the development would support rural supply chains across the National Park (including the other British Garden Centre sites within the National Park at Lewes), provide flexibility for an established business and make a more efficient use of brownfield land.
- 4.9 The development would also be in accordance with policy 9 of the emerging Pulborough Neighbourhood Plan which supports the intensification and extension of the existing garden centre and the facilities of its ancillary uses. Although the proposed warehouse building will not strictly be ancillary to Pulborough Garden Centre it will be used to store some goods and produce for this particular centre, but also those within the wider area, including others within the South Downs National Park area.
- 4.10 The proposed warehouse will be well related to the existing garden centre buildings and so will not introduce new development into an area where there currently is none. It would also tidy up the appearance of the site as it is currently occupied by ad hoc storage containers and pallets of bulky goods and would contain all of this within the building.
- 4.11 The proposals would represent a slight increase in the intensity of the use of the site, but it is already used for storage, and so would not alter the existing use. The scale of the development in providing an additional 558 sqm of B8 floorspace is also proportionate to the existing garden centre buildings on the wider site. The adjacent garden centre would continue to have its own dedicated warehouse area (behind the internal soft-play facility).
- 4.12 It is therefore considered that the principle of the development on this site is acceptable and is in accordance with the relevant planning policies of the South Downs Local Plan.

Design, Landscape and Visual Impact

- 4.13 Due to its location within the National Park and in line with the provisions of Strategic Policies SD4, SD5 and SD6, careful consideration has been given to the layout, scale and design of the proposals to ensure that it helps to conserve and where possible, enhance the surrounding context of the site and nearby landscape features.
- 4.14 Although the site is well screened from the surrounding area, it is recognised that the proposal should remain at the same scale and be well related to the existing buildings on site.
- 4.15 The application is accompanied by a Landscape and Visual Statement which concludes that the existing site presents an opportunity to accommodate the proposed changes without unacceptable change to the existing land use, landscape setting and associated visual amenity afforded to local residents, public right of way users and road users.
- 4.16 The scale of the proposed building is also appropriate to its landscape context and in particular there is an opportunity to keep the ridgeline as low as possible, and the building has been placed to retain existing screening vegetation around the boundary of the site.
- 4.17 The application proposals therefore accord with the local landscape character and landscape and design related policies.

Sustainability

- 4.18 The supporting Sustainability Statement sets out how the proposals accord with policy SD48 by adopting a 'Lean, Mean, Green' approach which considering the building fabric and building services.

Ecology

- 4.19 Strategic Policy SD9 requires development proposals to conserve and enhance biodiversity. In accordance with this, a Preliminary Ecological Appraisal report has been prepared by BiOME Consulting which supports the application.
- 4.20 This concludes that there would be no adverse impacts to designated sites within the vicinity of the site, and that no potential adverse impacts to protected or important species were identified. As such the proposals are in accordance with Policy SD9.

Highways, Access and Parking

- 4.21 In terms of access, it is proposed to utilise the existing main garden centre access and no changes are proposed to this. The site is highly accessible with access taken directly from the A283, Stopham Road.
- 4.22 The plans include a service yard area which will allow for parking and turning of vehicles associated with the warehouse.

- 4.23 Although there is likely to be an increase in vehicular movements associated with the new warehouse building, given that it will be used to service other British Garden Centre sites in the wider area, it is not considered that these would increase materially over and above those connected with the existing use of the site and the Pulborough Garden Centre site as a whole.

Lighting and Noise

- 4.24 As shown on the proposed plans it is not proposed to provide any additional external lighting and there are no roof lights or windows within the building therefore preventing any additional light spill. The proposals therefore comply with Policy SD8 as they will conserve quality of dark night skies.
- 4.25 In terms of noise, given the nature of the development and its location, it will not result in any material increase in noise or disturbance within the local area and will therefore maintain the existing tranquil conditions of this part of the National Park in line with Policy SD7. It is also likely to cause less noise and disturbance than the current situation as any unloading or movement of stock will be carried out within the building rather than the open site.

Flooding

- 4.26 The application site is located within Flood Risk Zone 1 and is therefore at low risk of flooding. The development aligns with the provisions of national planning policy which aims to direct development away from areas at the highest risk of flooding.
- 4.27 As the site extends to less than 1ha, the proposal is considered minor development and a flood risk assessment is not required. A surface water drainage strategy has been produced however and it is included within this application to avoid the need for a pre-commencement condition. The strategy contains a soakaway test report that confirms that the ground is unsuitable for infiltration, so attenuation is proposed underneath the adjacent customer car park.

Heritage/Archaeological Considerations

- 4.28 Cokehurst, a Grade II Listed private dwelling lies adjacent to the west of the site. No specific text is included within the listing setting out the heritage significance of the property though it's listing text reads: "T-shaped building. East-west wing C18 or earlier. South wing. C19. Two storeys. Three windows. Stone rubble with red brick dressings and quotas. Tiled roof. Casement windows"
- 4.29 The dwelling sits within a private garden and is bordered by tall dense hedging which obscures it from the application site. The garden forms the setting of the listed building.
- 4.30 Due to the screening vegetation around the boundary of the application site, the proposed development will only be visible from its immediate setting and will be seen in the context of the existing garden centre buildings. Given that views from or to the listed building are obscured by the perimeter hedging, it is considered that the development will not cause any harm to the appearance, setting or significance of the listed building.

6.0 Summary and Conclusions

- 5.1 This planning statement has been prepared by Alder King Planning Consultants on behalf of British Garden Centres in support of an application for a new warehouse building within the wider Pulborough Garden Centre site.
- 5.2 The development is required in order to provide storage for seasonal and non-seasonal produce for the wider British Garden Centres network of sites, including the one at Pulborough and Lewes. It will help to secure the long term future of the British Garden Centre business, support the local rural economy, create jobs and make a more efficient use of the existing site.
- 5.3 Along with the wider application package of documents and plans, this statement demonstrates that the proposed development is acceptable from a planning perspective. The proposals are fully in compliance with land use policies which support economic development within the South Downs National Park.
- 5.4 It is demonstrated that the proposal can be accommodated on site without any impact on landscape character and visual amenity, and the proposal will have no adverse impacts upon the National Park in terms of any recognised ecological considerations. The proposal will also be acceptable in terms of highways, parking and access, in lighting and noise terms, and in terms of flood risk and heritage impact.
- 5.5 In light of the above, we trust that the National Park Authority will agree that the proposal meets the requirements of policies within the adopted SDLP, and that planning permission can be granted accordingly.