



PLANNING STATEMENT

On Behalf of:
Dunmoore Group

In Respect of:
Hilland Farm Land and Billingshurst Business Park Phases 3

Date:
January 2026

Reference:
03716/S009

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EXECUTIVE SUMMARY

This Planning Statement has been prepared on behalf of the Dunmoore Group to support an outline planning application with details of means of access included and all other matters reserved for 4,885sqm (GEA) floorspace for business/employment use Eg(iii)/B2/B8, with associated yard space and vehicular parking.

The application is submitted to be considered alongside a live application for residential development to the north, on the balance of the undeveloped phase 2 land at Billingshurst Business Park (HDC Ref. DC/25/1910). Together these applications respond to and address the delivery challenges associated with the extant commercial consents and will enable the viable completion of the Phase 2 and Phase 3 land, providing for much needed housing and high quality new business floorspace.

The application proposals will positively complement and enhance this part of the site as a high quality business destination following the delivery of EVM's new headquarters immediately to the east of the site which were granted planning permission last year under reference: DC/25/0458.

A Balanced and Deliverable Scheme

- Employment uses are reallocated to the flatter Phase 3 land, confirmed as suitable through the recently approved EVM facility (HDC Ref. DC/25/0458). These proposals will expand and extend the offer of high quality employment floorspace at this part of the site.
- A deliverable residential development is introduced to the more suited Phase 2 land (HDC Ref. DC/25/1910).
- The residential proposals are contained entirely within the Built-Up Area Boundary (HDC Ref. DC/25/1910) with these proposals extending to the south on the Phase 3 land, now accepted as a business location by the EVM permission, on land which is encircled by surrounding development on all sides. As such it proposes development in a sustainable and well-defined location.
- This balanced approach enables early housing delivery while ensuring the employment opportunities at the site are maintained.

Employment and Economic Benefits

- Maintains and expands provision of high quality new employment space at this established, highly sustainable location.
- Supports the provision of local jobs through a combination of new and existing occupiers.
- Complements the arrival of new occupier EVM to their expanded premises which have been consented on land to the east of the site.
- Provides flexible workspace capable of meeting the needs of smaller start-up units and/or larger scale business relocations and expansion (as in the case of EVM).
- Relocating employment uses to Phase 3 ensures long-term deliverability, operational efficiency, and a high-quality commercial environment that reinforces Billingshurst's role as a key employment centre.

Environmental and Infrastructure Enhancements

- Makes efficient use of existing infrastructure, including established access, drainage, and utilities.
- Incorporates sustainable design measures, including renewable energy technologies
- Retains and enhances all existing trees.

Planning Balance and Conclusion

- Represents a deliverable, sustainable and well-balanced scheme in a highly accessible location.
- Complements the live planning application for residential development on the balance of the phase 2 land and commercial development at the neighbouring parcel to the east.
- The proposals deliver significant economic, social and environmental benefits that clearly outweigh any limited residual impacts.
- Provides a long-term, deliverable and sustainable solution that secures the future of Billingshurst Business Park and enables the completion of this long-established development site.

1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Dunmoore Group ('Dunmoore', the current landowner and developer), in support of their hybrid application for the following:

"Outline permission for erection of buildings for Eg(iii)/B2/B8 use with associated yard areas, vehicle parking and access. All matters apart from means of access reserved for future consideration."

- 1.2 The proposals submitted to be considered alongside a live application for residential development to the north, on the balance of the undeveloped phase 2 land at Billingshurst Business Park (HDC Ref. DC/25/1910). Together these applications respond to and address the delivery challenges associated with the extant commercial consents and will enable the viable completion of the Phase 2 and Phase 3 land, providing for much needed housing and high quality new business floorspace.
- 1.3 The application site represents the balance of the phase 3 land to the west of EVM's recently permitted site for a new headquarters of a passenger vehicle workshop and storage facility, who have outgrown their existing premises in Southwater. It occupies an infill area which is outside the designated Built Up Area Boundary (BUAB) of Billingshurst yet is surrounded on all sides by existing or committed development.

Background to the application

- 1.4 The application proposals form part of the applicants revised strategy to enable the successful delivery and completion of their phase 2 land (the eastern, undeveloped part of Billingshurst Business Park) and phase 3 (to the south of Billingshurst Business Park). This is explained in some detail in the Planning Statement which supports the mixed-use application ref. DC/25/1697, which is currently under consideration.
- 1.5 In short it comprises of utilising the balance of the phase 2 land for housing, with larger format commercial development being located on the flatter Phase 3 land. This enables the delivery of a viable scheme capable of providing much needed housing to the north, while maintaining a supply of high quality business space at this well established, highly sustainable location.

Scope of application

- 1.6 The following reports are included in support of this statement:
- Ecological Appraisal (prepared by All Ecology)
 - BNG Metric and Statement (prepared by All Ecology)
 - Archaeology & Heritage Assessment (prepared by ACD Environmental)

- Air Quality Assessment Report (prepared by M-EC)
- Energy Statement (prepared by Fowler Clark)
- Flood Risk Assessment and SuDS Assessment (prepared by Motion)
- Water Neutrality Statement (prepared by Motion)
- Environment Noise Assessment (prepared by Sharps Redmore)
- Transport Assessment (prepared by SLR)
- Arboricultural Assessment (prepared by Tim Pursey)
- DAS (prepared by DLA)
- Landscape Appraisal (prepared by DLA)

1.7 This submission is also supported by a suite of planning drawings comprising full details of the proposed development.

1.8 The statement proceeds on the following basis:

- **Section 2** describes the site and its surroundings as well as its recent planning history;
- **Section 3** provides a description of the proposed development;
- **Section 4** contains a review of relevant planning policy;
- **Section 5** provides a planning assessment; and
- **Section 6** provides a summary and conclusion.

2.0 SITE DESCRIPTION AND PLANNING HISTORY

The Site and Surrounding Area

- 2.1 The application site extends to 1.3ha and is located to the south of the Phase 2 land, as shown in the plan below, which also shows the residential application to the north subject of the current planning application.
- 2.2 It is evident that the site is enclosed by existing or committed development on all sides, which to the north, south and west are all contained within the defined BUAB boundary.



- 2.3 The site is not subject to any environmental or heritage designations. The nearest designated heritage assets are the Grade II listed buildings at Summers Place around 650m to the north and the Grade II listed Manor House some 350m to the south of the site, the curtilage of which marks the northern boundary of the Billingshurst Conservation Area. These designated heritage assets are substantially visually separated from the site by the proposed built form to the north and south. The nearest statutory

designated ecological site, the Mens Special Area of Conservation (SAC) is approximately 5km from the site. The site lies within flood zone 1 (i.e. low risk) and is therefore suitable for all types of development. The site contains no protected trees and is not the subject of any landscape designation.

- 2.4 The centre of Billingshurst is around 600m to the south of the site. The site is well served by public transport with bus stops on either side of the A29 carriageway in close proximity to the site which facilitate services into the town. In addition, a mainline rail station is located in Billingshurst, less than 2km from the site providing direct services to Horsham, Gatwick Airport and London. Bus infrastructure improvements and a cycle/pedestrian link between the site and Billingshurst to the south have already been delivered as part of the works completed on-site.

Planning History

- 2.5 The planning history of the site is extensive reflective of the proactive approach from Dunmoore to bring forward a positive development for Billingshurst and the wider area of which the community can be proud during challenging economic times.
- 2.6 The timeline set out below, is not exhaustive in respect of all planning records which relate to the site, but track key stages since planning permission for the business park was granted, as follows:

Billingshurst Business Park Timeline				
Date	Stage of Development	Other factors		
Mid 2019	Detailed permission c.5,000sqm B Class Outline permission c. 14,000sqm B Class Outline permission PFS and Drive thru coffee unit		Covid Pandemic Lockdown (March 2020-March 2021) and ongoing after effects.	
Early 2021	Installation of new roundabout junction, on and off-site access improvements including bus, pedestrian and cycle infrastructure.			
Early 2021	Units 3-13 with detailed permission completed on speculative basis. All occupied and trading (4,140sqm)			
Mid 2021	Made Billingshurst NP includes Billingshurst Business Park Phases 1 and 2 within BUAB			
Late 2021	Petrol Filling Station (PFS) complete. Occupied and trading	Sussex North Water Neutrality Zone – NE advice requires applications to demonstrate water neutrality to secure planning permission.		Covid after effects, geo-political risk, labour shortages and high inflationary pressures on construction materials have all conspired to present difficult economic conditions for employment development
Late 2021	HDC refusal of Phase 3 employment application. 1. Conflict with LP policy and no compelling need. 2. Landscape impact.			
Early 2022	Unit 14 completed for expanding firm of local builders merchants. Occupied and trading (c.1,000sqm)			
Mid 2022	Reserved matters approval for Units 16/17 (3,655sqm), remains extant.			
Mid 2022	Drive thru coffee unit completed, occupied and trading			
Mid 2022	Drive thru restaurant (phase 1) refused: 1. Water neutrality 2. Harm to setting and character or settlement edge 3. Loss of B Class employment			
Mid 2022	Detailed permission granted for 'Enterprise Park' units 25-32 (c.3,000sqm), remains extant			

Billingshurst Business Park Timeline				
Date	Stage of Development	Other factors		
Mid 2022	Dunmoore sign legal commitments to deliver bespoke units for two local occupiers. Unit 17 Pigs Ears Beers and Units 29&30 IDS Group.			
Late 2022	Lidl foodstore located centrally within Phase 2 completed. Occupied and trading.			
Early 2023	Reserved matters approval for balance of Phase 2 Units 18-24 granted (6,000sqm-8,696sqm), remains extant.			
Early 2023	Appeal dismissed Phase 3 on grounds of: 1. Conflict with spatial strategy and lack of compelling economic need. However, it was acknowledged economic and environmental benefits of the proposals, noting landscape impacts are limited.			
Early 2024	Dunmoore are timed-out of the delivering for two committed local occupiers. Unit 17 Pigs Ears Beers and Units 29&30 IDS Group.			
Early 2024	Dunmoore sign legal commitment for Unit 18 the Range.			
Mid 2024	Full Planning Application for 'The Range' submitted.			
Late 2024	Dunmoore sign legal commitment and funding agreement with local company EVM for c 3.4 acre site on Phase 3.			
Early 2025	Application for bulky goods retailer 'The Range' refused permission on 19.2.2025.			
Late 2025	Planning Consent granted from local company EVM's new coachworks facility on Phase 3.			

Other Relevant Planning History

- 2.7 There has also been a further permission granted on land to the south-west of Billingshurst Business Park. Application reference DC/23/2103 secured consent on 22nd May 2024 for the redevelopment of the existing farmyard with a small commercial scheme of 12 starter units. Whilst this proposal was not submitted by the applicant it should be read as a further expansion of what is now a successful commercial hub at Billingshurst. Indeed, the proposal was supported by the Council's Economic Development team.
- 2.8 Two residential applications at Hilland House, which lies to the east of the Phase 2/3 land, one for 117no. dwellings (Ref. DC/24/0887), the other being for 125no. dwellings (Ref. DC/24/0749) were both reported to planning committee in December 2024, with officer recommendations they be approved. Both schemes show residential development wrapping around the western edge of the Phase 2 business park and the application site.
- 2.9 Despite officer recommendations of approval in respect of both applications they were both refused at planning committee for the same single reason that access to the proposed development by means of cycling and walking (in particular reliance on FP1942) were considered to be substandard. The larger of the two schemes (DC/24/0749) was the subject of an appeal which was allowed on 8th July 2025.
- 2.10 In allowing the appeal the Inspector found:

- HDC to be in substantial shortfall in delivering the required level of homes;
- The presumption in favour of sustainable development is engaged;
- In these circumstances the delivery of new market and affordable homes attracts significant weight in favour of allowing the appeal;
- The economic benefits of the development are significant;
- The modest adverse impacts of the development, including modest adverse landscape impacts would not significantly and demonstrably outweigh the significant benefits of the development.

2.11 Planning permission has been granted for EVM's new facility (Ref. DC/25/0458). The application supports EVM, a Southwater-based vehicle manufacturer that has outgrown its premises and must relocate within a set timeframe. To expedite the move, EVM submitted a separate but complementary application to this wider re-plan. These proposals complement those proposals, the approved details of which have been included on the submitted plans for context.

3.0 THE PROPOSED DEVELOPMENT

- 3.1 The application forms part of the applicant's revised strategy for the site to provide housing to the north (phase 2 land) and business floorspace to the south (Phase 3). This has been for deliverability reasons and will enable the site to make a positive contribution to meeting future housing and employment needs.
- 3.2 This application will complement the first stage of the commercial development of the phase 3 land following the approval of the EVM application in October 2025. It will provide for 4,885sqm (GEA) floorspace, served by appropriate levels of vehicular parking, servicing space and yard areas to meet business needs. The flexible space offered is capable of accommodating the needs of smaller start up units, enabling to respond swiftly to market demand. This also directly address comments made by the Parish on their preference for smaller units.
- 3.3 The revised strategy for the wider site utilises the level contoured land across Phase 3, which is better suited to accommodating larger format commercial buildings and yards than the Phase 2 land, as confirmed by the recent EVM consent on Phase 3, with smaller format housing proposed on the more sloping land to the north. The key benefits of the remaster-planning include:
- Maintain provision of high quality business space.
 - Enhance the location as a well established business location soon to be reinforced by the provision of a new headquarters of local anchor tenant EVM
 - Utilises the much flatter land for the more suited commercial space
 - Locates larger commercial space next to the pylons, similar to that delivered at Phase 1.
 - Utilise land more efficiently under pylon conductors for yard spaces / car parks, similar to that delivered at Phase 1.
 - Enable the provision for much needed new housing contributing towards meeting acute unmet needs, located inside the Built-Up Area Boundary (BUAB), and located away from the pylons and conductors.
 - Utilises established sustainable links to the Village Centre, and adjacent to existing amenities on the Business Park.
 - Makes best use of the existing land-levels for the different uses, which is key to deliverability (see site conditions sub-section below).
 - Makes use of the infrastructure (access, power, fibre, drainage) already delivered through Phase 1.

4.0 PRE-APPLICATION ENGAGEMENT

HDC Pre-application Enquiry

- 4.1 The submission of applications relating to the applicant's new strategy this application was preceded by the submission of a pre-application enquiry to Horsham District Council. Further details are provided in the Planning Statement which supports application no. DC/25/1697.
- 4.2 The feedback received acknowledged that:
- There is a significant shortfall in housing delivery, well below requirements.
 - Careful consideration will need to be given to the interface of housing and commercial development.
 - Engagement should be undertaken with the Highway Authority. Comments already received to the pending application DC/25/1697, indicate they retain no concerns in relation to impacts on the capacity of the local highway network or safety.
 - The western section of the site would be largely screened by the bund which runs along the southern side of the site. EVM permission granted since those comments were provided means that views of the site from the east would also be obscured.
 - It was accepted that the benefits of employment and housing development could outweigh the harm of extending beyond the BUAB into phase 3, such that HDC could support the proposals.

5.0 PLANNING POLICY REVIEW

Planning Policy Overview

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, the starting point for decision making, unless material considerations indicate otherwise. One material consideration of weight is the policies of the NPPF, a document that provides the framework against which development plan policies should firstly be produced and then maintained and one which seeks to guide the approach taken by the decision maker when determining planning applications.

New government and new national policy, NPPF (2024).

- 5.2 The new government are unapologetic about pursuing an avowedly pro-growth agenda, with positive planning decisions a crucial central plank of their plans to get Britain building. This includes a particular emphasis on delivering the homes the nation needs, with their commitment to deliver 1.5million homes by the next parliament. Reflective of that commitment the former deputy Prime Minister made an announcement to coincide with the publication of the new NPPF that:

"We must all do our bit and we must all do more. We expect every local area to adopt a plan to meet their housing need. The question is where the homes and local services people expect are built, not whether they are built at all."

- 5.3 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. The most recent version was adopted in December 2024. It is supported by the Planning Practice Guidance (PPG) first introduced in March 2014.
- 5.4 The Framework exemplifies the Government's push towards efficiency in the planning system and embodies a pro-development stance. At the core of the Framework is a presumption in favour of sustainable development. Therefore, in preparing plans, local planning authorities (LPAs) should positively seek opportunities to meet the development needs of the area. In taking decisions, it means approving development proposals that accord with an up-to-date development plan without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, LPAs should grant permission unless adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework as a whole.
- 5.5 In order to foster the delivery of sustainable development, LPAs are encouraged to approach decision-taking in a positive way (paragraph 39 of the NPPF). A creative approach to the consideration of planning

applications should be applied and decision-takers at every level should seek to approve applications for sustainable development where possible through working proactively with applicants to secure developments which improve the economic, social and environmental conditions of an area.

- 5.6 With particular regard to economic development paragraph 85 indicates that policies and decisions should create conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering local business needs and wider opportunities for development.
- 5.7 The NPPF, section 11, also places a strong emphasis on making effective use of land, supporting the development of under-utilised land.
- 5.8 Of particular relevance to this application are the following sections of the NPPF:

- Section 2: Achieving sustainable development
- Section 4: Decision taking
- Section 6: Building a strong, competitive economy
- Section 7: Ensuring the vitality of town centres
- Section 8: Promoting healthy and safe communities
- Section 9: Promoting sustainable transport
- Section 11: Making effective use of land
- Section 12: Achieving well-designed and beautiful places
- Section 14: Meeting the challenge of climate change, flooding and coastal change
- Section 15: Conserving and enhancing the natural environment
- Section 16: Conserving and enhancing the historic environment

Annex 1 - Implementation

Horsham District Planning Framework

- 5.9 The Horsham District Planning Framework (HDPF) was adopted in November 2015, which provides the current strategic policy framework for the period until 2031.
- 5.10 The Policies of relevance to this application which will be referred to in the planning assessment below are:
- Policy 1 Strategic Policy: Sustainable Development
 - Policy 2 Strategic Policy: Strategic Development
 - Policy 3 Strategic Policy: Development Hierarchy
 - Policy 4 Strategic Policy: Settlement Expansion
 - Policy 7 Strategic Policy: Economic Growth
 - Policy 9 Employment Development
 - Policy 12 Strategic Policy: Vitality and Viability of Existing Retail Centres
 - Policy 13 Town Centre Uses
 - Policy 24 Strategic Policy: Environmental Protection

- Policy 25 Strategic Policy: The Natural Environment and Landscape Character
- Policy 26 Strategic Policy: Countryside Protection
- Policy 31 Green Infrastructure and Biodiversity
- Policy 32 Strategic Policy: The Quality of New Development
- Policy 33 Development Principles
- Policy 34 Cultural and Heritage Assets
- Policy 35 Strategic Policy: Climate Change
- Policy 36 Strategic Policy: Appropriate Energy Use
- Policy 37 Sustainable Construction
- Policy 38 Strategic Policy: Flooding
- Policy 39 Strategic Policy: Infrastructure Provision
- Policy 40 Sustainable Transport
- Policy 41 Parking

Billingshurst Neighbourhood Plan

- 5.11 The Billingshurst Neighbourhood Plan passed its own independent examination with the Examiner's Report recommending it be made subject to modifications published on 11th November 2020. These modifications included the extension of the built-up area boundary to include all the phase 2 land. It was endorsed by the community at referendum in May 2021 and was formally made by Horsham District Council on 23rd June 2021 at which point it formally became part of the development plan covering the application site.

The emerging Local Plan.

- 5.12 The Local Plan (LP) Inspector's interim findings were published in April 2025. It gave the Council the choice of either withdrawing the LP or receiving his report, a report which will conclude the duty to cooperate has not been satisfied and therefore the LP is not legally compliant. Correspondence between HDC and LP Inspector since has resolved to agree a meeting at a date to be confirmed to explore whether it will be possible for the Local Plan to progress.
- 5.13 In the event the Local Plan can proceed it is likely to be subject of further delay and consultation as it is accepted in the Council's latest letter dated 4 December 2025 that it will be necessary to facilitate a higher level of growth. A matter that these proposals can make a positive contribution towards meeting.

6.0 PLANNING ASSESSMENT

- 6.1 This section of the Statement considers the merits of the proposal in respect of national and development plan policy, having due regard to all relevant material considerations.
- 6.2 The full range of issues raised by the proposals, considered in turn within this section with many amplified within the suite of technical studies submitted in support of this application, comprise the following:
- Principle of Development
 - Highways and Access
 - Housing Mix and Tenure
 - Layout and Design
 - Landscape
 - Ecology
 - Trees
 - Archaeology and Heritage
 - Air Quality
 - Noise
 - Flooding and Drainage
 - Utilities
 - Energy
 - Lighting

The Principle of Development

- 6.3 Overarching policy 1 of the HDPF is framed in the same way as paragraph 11 of the NPPF. For decision making this means granting planning permission where policies which are most important for determining the application are out of date, unless the adverse effects of doing so would significantly and demonstrably outweigh the benefits.
- 6.4 In respect of employment the failure to update employment policies in the manner promised means that the tilted balance is engaged in this respect also. The Inspector determining the appeal for Phase 3 confirmed this.
- 6.5 The employment floorspace which was to be delivered on the balance of Phase 2, will be moved to this land to the south, also in the ownership of Dunmoore. This land is located immediately between the BUAB, sandwiched between it to north, south and west, with development along all these three boundaries. Employment floorspace on this land has been explored before at appeal. This was dismissed on the basis that the Inspector was not convinced that there was a quantitative need for this additional

employment land, taking account of existing commitments (including the Phase 2 land, and others) at that time. A factor which now no longer applies given the proposals replace/offset the committed floorspace from Phase 2.

6.6 For this reason the Inspector found that the conflict with the development plan in respect of policies 2, 4, 7, 10 and 26 and BILL1, due to its location beyond the BUAB, merited refusal. This was despite acknowledging the significant economic benefits of the employment development proposed and that these policies were out of date. In other respects the Inspector found:

- Only limited harm would arise to the character and appearance of the site and the surrounding area, including landscape character.
- No harm to heritage assets.
- No harm to the setting of the South Downs National Park.
- All other technical matters relating to items such as highways, drainage, water neutrality etc had been agreed.

6.7 Since that decision (February 2023) the Council's path to having a new Local Plan is much more uncertain than the projections at the time when the appeal was considered. The Local Plan Examination began but was then halted in December 2024, with the Local Plan Inspector confirming this was due to: 'significant concerns about the soundness and legal compliance of the plan.' This was followed in April 2025 by the publication of the Inspector's Interim Findings which conclude that the LP has failed the duty to cooperate and as a result should either be withdrawn or receive the Inspector's report which will conclude that the Plan is not legally compliant. This allied with Government plans for creating larger unitary authorities, including at Sussex means the Horsham LP may never be resurrected. The future of the Horsham Local Plan remains uncertain at the time of writing.

6.8 There is therefore no plan-led means of promoting Phase 3 land, while in the background, with the introduction of the Government's new national policy and method for calculating local housing needs, the development growth needs in Horsham have grown substantially. Housing growth needs which can in part be positively addressed by development of the Phase 2 land with the balance of the committed employment land on Phase 2, shifted to Phase 3 land. A situation quite different to that which the Inspector considered for the previous Phase 3 appeal, ensuring a pipeline of well-located, accessible employment land is maintained, at a time when others have stalled (Nowhurst) or lapsed (Brinsbury).

6.9 Furthermore, the neighbouring residential scheme at Hilland House has now been consented such that the Phase 3 land will be entirely surrounded by development. Additionally, the farm buildings that used to service the Phase 3 agricultural land were granted planning permission in 2024 to be demolished and replaced by small startup business units. Furthermore the case put forward for development on the Phase

3 land for EVM has been accepted by the Council in their approval of application HDC Ref. DC/25/0458. Thus there remains no reasonable justification to resist the positive development of this enclosed piece of land, which effectively will be screened from all sides.

- 6.10 It represents a deliverable (for the reasons outlined above) and extremely positive basis on both employment and housing grounds to take this site forward. The benefits of the proposals clearly outweigh any limited policy conflicts (accepted as being out of date) or landscape impacts. Impacts which in any case would be insufficient to outweigh the substantial benefits and certainly not breach the threshold set by the tilted balance. On this basis the proposals accord with policy 1 of the HDPF and would benefit from the tilted balance for decision making under paragraph 11d) of the NPPF.
- 6.11 To conclude this section on the principle of development our case is that a partial conflict may arise with a very dated Local Plan. However this is only on the basis that this part of the site falls beyond, albeit surrounded on all sides by the BUAB and consented schemes. In the absence of any emerging replacement Local Plan and taking account of the highly sustainable, well contained nature of the application site at one of the District's largest settlements, it must be accepted that the weight to be afforded such a conflict is very limited indeed and the substantive benefits of the proposals clearly outweigh them.

Highways and Access

- 6.12 The Transport Assessment which accompanies the application considered the effects of the development on the local highway network, also taking into account cumulative effects of other committed development. It finds that the development will not have a materially adverse impact on flows of traffic in the area, the residual effects of which would not be considered 'severe' for the purposes of the NPPF, paragraph 116. This has since been confirmed in the comments of WSCC Highways on live planning application DC/25/1697, which proposes marginally more business development on this part of the site (5,605sqm) than the current application.
- 6.13 The site benefits from a sustainable location with good highway, pedestrian, cycle links and public transport links. As part of Phases 1 and 2, the well established four arm roundabout on Stane Street was installed along with the provision of a pedestrian/cycle link to the south of the site and bus stops adjacent to the site along the A29. These have been successfully in use in association with the commercial use of the site and mean that unlike alternative speculative schemes the high quality transport links which the site benefits are already in place, well known and capable of supporting the proposals.
- 6.14 In turn this means that the proposals can be brought forward more quickly than would otherwise be the case, with less disruption to the local highway network and enable the significant benefits of the proposals to be realised sooner.

- 6.15 In terms of relevant NPPF footnote 9 policy considerations, paragraph 110 indicates that significant development should be focussed at locations which are or can be made sustainable. This is undoubtedly the case here, located at the edge of one of Horsham's largest settlements, accessible via a choice of transport modes, and within acceptable walking and cycle distance of a range of local amenities and services. With regard to paragraph 115 of the NPPF safe and suitable access from the local highway network is already in place and effects on the local highway network will be acceptable.
- 6.16 It is therefore considered that the proposals accord with the key transport policies of the NPPF and HDPF policies, in particular policies 40 and 41.

Layout and Design

- 6.17 The proposed business units will be entirely contained by built development and will be seen against the backdrop of the large electricity pylons which runs along the southern part of this site and a telecommunications mast at the eastern edge of the site. Further south is landscaped bunding and the A272 Hilland Road link road. Proposed commercial buildings to existing residential dwellings to the south have a separation distance of in excess of 80metres.
- 6.18 The application proposals will complement the EVM headquarters immediately east of the site and in layout and design terms provide for an arrangement of units and parking which has proved effective in the established phase 1 part of the site. In these regards the proposals satisfy the criteria expressed in policies 32 and 33 of the HDPF.

Landscape

- 6.19 A Landscape and Visual Assessment work submitted draws from that prepared for bulkier large format commercial units. By comparison the current proposals will have a relatively much reduced on the landscape setting of the site, particularly when considered in the context of the development which has been approved to the south and east of the site.
- 6.20 It shows there are no national, regional or locally designated landscapes or features within or immediately adjoining the site. It notes that the rural nature of the site has effectively been lost by the expansion of residential development, the eastern expansion relief road and large electricity pylons all to the south and the new committed business park to the north and west of the site. This rural nature has been further diminished following permission of the Hilland House housing development (125no. homes) which wraps around the entire eastern edge of the application site.
- 6.21 Reflecting on the evidence base of the draft Local Plan and the Council's conclusions on the suitability of the site for development in its site assessment papers the LVIA confirms that the Landscape Institute

states that capacity studies 'should be undertaken at a strategic landscape planning level rather than the individual project proposal level' – (Draft Technical Guidance Note 05/23). This firstly confirms that any findings of the evidence base should be considered high level and devoid of detailed consideration of mitigation. For the purposes of the LVIA however, reference has been made to the Horsham District Landscape Capacity Assessment Rev C (May 2021) in which the site is identified as Local Landscape Character Area 49: Land North East of Billingshurst and assessed as having a No/Low Capacity for Large Scale Employment.

- 6.22 It is acknowledged that Local Landscape Area 49 is a considerably large landscape extent, in which the site forms a small segment (3% of Landscape Area 49). A brief investigation of the criteria indicated that the features that afforded a higher contribution to Capacity Area 49 appear to be located within the wider landscape to the east of the site. These features and the site's contribution are discussed within the LVIA.
- 6.23 Ultimately the conclusions of the LVIA corroborate those of the previous appeal, that the site is of low landscape value due to the lack of high-quality features and the strong urban influences in and around the site. Indeed the application site will be surrounded by built form on all sides, limiting the availability of longer distance views. In this respect the proposals accord with the relevant provisions of policies 25, 32 and 33 of the HDPF.

Ecology

- 6.24 This submission has been informed by an Ecological Appraisal prepared by All Ecology. It confirms that no statutory or non-statutory designated sites exist within 1km of the site. The appraisal summarises the habitats present on-site and the flora and fauna they support. It was considered that the only habitat that could be regarded as being of potential value was the short length woodland edge on the northeast corner of the site, which will be retained with a soft landscape buffer to the new buildings.
- 6.25 In terms of habitats, it was considered that the remaining habitats on site are common, of low to moderate ecological value and easy to replace. Any impacts because of loss/change to these habitats in terms of their vegetation are considered to be negligible.
- 6.26 There are several recommendations within the appraisal to mitigate any impacts and enhance the biodiversity on site wherever possible. With these measures in place there is no reason in ecological terms why the site should not be brought forward for development. The application proposals therefore accord with policy 31 of the HDPF.

Trees

- 6.27 A Tree Report has been prepared by Tim Pursey which identifies and comments on the quality and condition of existing trees on the site. This shows the trees are to the site boundaries and can be retained. The tree survey provides an accurate up to date record of trees present on-site and shows that the limited

number of trees within the site do not represent a constraint to the commercial redevelopment of the site, nor the housing development to the north.

- 6.28 The report confirms that subject to implementing recommended tree protection measures during construction, no unacceptable tree impacts will result. In this regard the proposals accord with policy 31 of the adopted HDPF.

Archaeology and Heritage

- 6.29 An Archaeology and Heritage Statement has been prepared by ACD Environmental. The site does not contain any designated heritage assets and no scheduled monuments or registered landscapes lie within the study area. The closest designated heritage asset to the north is a Grade II listed garden structure in the grounds of Summers Place, 300m north of the site. No designated heritage assets have a relationship with the site such that their setting would be adversely affected by the development of this site.
- 6.30 An extensive area east of Billingshurst is designated by the county as an Archaeological Notification Area, suggesting high archaeological potential the area forms part of a much larger extensive area, designated ahead of major residential development to the south. However, it is unclear why such a large area has been designated given that investigations indicate that much of the area has limited archaeological potential.
- 6.31 The geophysical survey and trial trenching at the north and north-west parts of the site indicated nothing of significance. A further evaluation of the Phase 3 land is currently under way as required by the EVM permission. The application proposals are consistent with paragraph 34 of the HDPF.

Air Quality

- 6.32 The air quality assessment completed in support of the application confirms that the site does not lie in an air quality management area (AQMA). The assessment has considered the likely effects of the development on air quality during its construction and operational phases. Furthermore, it outlines mitigation measures which can be employed. The assessment concludes that the effect of the proposed development is predicted to have a negligible to slight-adverse impact on local air quality, which is not considered to be significant and therefore gives no rise to conflict with policies 2 and 24 of the HDPF.

Noise

- 6.33 A Noise Assessment has been prepared by Sharps Redmore in support of the application. It considers the noise environment of the site and the noise impact of the proposals on the nearest noise sensitive properties. The report finds that the existing noise levels are dominated by localised traffic on the A29, with occasional noise from aircraft. The report goes on to assess noise impacts associated with that from mechanical services plant, car park activity, internal break-out from buildings and from servicing activity. Subject to a recommended mitigation strategy including:

- Noise management plan
- Conditions similar to those imposed on Phases 1 and 2 for the proposed commercial buildings in phase 3.

6.34 The site can be developed and operated without adverse noise impacts. On this basis the application proposals are compliant with policies 24 and 33 of the HDPF.

Flooding and Drainage

6.35 An assessment of the site from a flood risk and drainage perspective has been undertaken by Motion. It confirms that the site is existing agricultural land site made up of open fields. Therefore, the existing site can be described as greenfield. The nearest watercourse to the site is an unnamed ditch (a tributary of the River Arun) which flows in a easterly direction along the sites southern boundary. The nearest main river to the site is the River Adur which is located 1km east of the site.

6.36 The EA's Flood Map for Planning shows that the entire site is located within Flood Zone 1 (less than 1 in 1000 annual probability of flooding from rivers or the sea). From a flood risk perspective it is appropriate for commercial development ('less vulnerable') taking account of the flood risk vulnerability categories which they fall into. Both the JBA Comprehensive Flood Maps (CFM's) and the EA's Risk of Flooding from Surface Water maps show that the Site has very low to high risk areas of surface water flooding. The development has been located to occupy areas at very low risk of surface water flooding. The site is at low risk of flooding from groundwater, infrastructure failure or from artificial sources.

6.37 The FRA demonstrates that the flood risk for the proposed development can be managed on site without increasing the risk to any neighbouring developments or downstream areas, and therefore fulfils the requirements of the PPG, NPPF and accords with Policy 38 of the HDPF.

Energy

6.38 The accompanying Energy Report, prepared by Fowler Clark, explains that the energy strategy for the site has been developed in accordance with the lean, clean, green energy hierarchy. The proposed design is free of fossil fuels, and as the electricity grid is progressively decarbonised the operational carbon emissions will diminish. It is proposed that the energy strategy for the site utilise air source heat pumps with PV roof based panels on appropriately orientated roofs. High efficiency LED lights will be provide across all dwellings and commercial buildings. As a result, the proposal complies with Policy 36.

6.39 With regards to the carbon emission and primary energy targets, the scheme will pass the Part L targets of the Building Regulations.

7.0 SUMMARY AND CONCLUSIONS

- 7.1 This Planning Statement supports the proposed business units at Phases 3 immediately to the south of at Billingshurst Business Park. The proposals should be considered in conjunction with the applicants live application for 125no. homes on land to the north. Together these form the applicant's revised strategy to realise the positive development of the remaining balance of the undeveloped phase 2 and phase 3 land at this long established development site. The combined proposals have been shaped by deliverability and sustainability considerations, responding directly to changes in market conditions and the evolving planning context. They represent a balanced and comprehensive solution that secures both new housing (under application DC/25/1910) and employment space, in a location where it is viable and deliverable to provide.

Deliverability and Land Use

- 7.2 Extant consents for commercial development on the sloping Phase 2 land have proven undeliverable due to abnormal site levelling, retaining structures. In recognition of these constraints, Horsham District Council supported the adjacent EVM facility (Ref. DC/25/0458), acknowledging that the flatter Phase 3 land provides a more practical and deliverable location for employment uses.
- 7.3 The re-masterplanning reallocates employment space to Phase 3, maintaining a supply of high quality commercial floorspace, while facilitating the delivery of much needed residential development on the underutilised land to the northern part of Phase 2. This allows both elements to come forward in a coordinated and deliverable way, supported by the Pre-Planning Application response from the Council.

Employment and Economic Benefits

- 7.4 The Phase 3 land will provide modern, flexible employment space, accommodating both the already approved EVM facility and these flexible business units. Together, these uses are expected to support and sustain local job opportunities for those residing in Billingshurst and nearby, sustaining and enhancing Billingshurst's role as a key employment centre. The repositioning of commercial uses adjacent to the pylons ensures appropriate land use relationships, visual containment and operational efficiency, while retaining high design quality and landscaping.

Environmental and Infrastructure Benefits

- 7.5 The development makes efficient use of existing infrastructure, with access, drainage and utilities already in place. The scheme incorporates sustainable design measures including renewable energy technologies and modern building standards. These features ensure compliance with current environmental policy and minimise the site's ecological and carbon footprint.

Planning Balance and Conclusion

- 7.6 The proposals as part of the applicant's new strategy for the wider site, fully align with national and local objectives for sustainable growth. The Government's pro-growth agenda and the 2024 NPPF emphasise the urgent need to boost both housing and economic development. Locally, the lack of an up-to-date Local Plan and the ongoing shortfall in housing supply mean that the tilted balance is clearly engaged.
- 7.7 The re-masterplanned scheme represents a deliverable and balanced response to these challenges. It provides a sustainable mixed-use development that:
- Delivers much-needed market and affordable homes;
 - Maintains employment capacity and supports local jobs;
 - Optimises land use in response to physical constraints; and
 - Integrates effectively with surrounding development and infrastructure.
- 7.8 When assessed as a whole, the economic, social and environmental benefits of the proposal clearly outweigh any limited, residual, and out-dated policy conflict. The scheme as presented across two applications represents a positive, sustainable and deliverable contribution to meeting Horsham District's housing and employment needs, and as such, planning permission should be granted without delay in accordance with the NPPF.