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Planning Statement

**Denver Poultry Farm, Okehurst Lane
Billingshurst**

March 2022



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Project Name: Denver Poultry Farm, Okehurst Lane,
Billingshurst

Location: Denver Poultry Farm, Okehurst Lane,
Billingshurst

Client: Denver Commercial LLP

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1. Introduction

- 1.1. This statement has been produced on behalf of Denver Commercial LLP in support of the Full Planning application at Denver Poultry Farm, Okehurst Lane, Billingshurst. The development description for the proposal reads:

“Full Planning Application for the provision of 2 storage buildings with vehicular access, landscaping and parking”.

- 1.2. This Statement sets out the relevant background for the determination of planning applications and illustrates how the proposal has been informed by the National Planning Policy Framework, adopted policies within the Horsham District Planning Framework 2015 and the Billingshurst Neighbourhood Plan 2019-2031.
- 1.3. This application should be considered with full regard to the following suite of supporting documents, drawings and plans:

- **Application Forms and Notices**
- **Application Drawings**
- **Community Infrastructure Levy Forms**
- **Design & Access Statement**
- **Water Neutrality Statement**
- **Arboricultural Impact Assessment and Method Statement**
- **Highways Statement**
- **Preliminary Contamination Risk Assessment**
- **Flood Risk Assessment and Drainage Strategy**
- **Ecology Surveys**
- **Landscape Design Strategy**
- **Landscape and Visual Appraisal**

2. The Site

- 2.1. The application site is situated just under 1km from the north of Billingshurst which is classified as a 'small town / larger village' under policy 4 of the Horsham District Planning Framework relating to settlement hierarchy. This means it has access to a wide range of services, facilities and transport connections.



Figure 1 - Location Plan

- 2.2. To the north of the site is the existing access point onto Okehurst Lane which benefits from screening into and out of the site from existing vegetation. Immediately to the west, the site boundary is characterised by an existing wooden fence and mature trees which run the length of this boundary. Beyond this is a residential property, Aspen Place with large grounds and a sand school located to the south. To the northeast is another residential property, Little Wynstrode. A line of mature vegetation and trees runs along the southern and south-eastern boundaries of the site with agricultural fields and views of Billingshurst beyond.
- 2.3. In terms of site constraints, the site lies outside of a defined settlement boundary and is within a countryside location. Approximately 70m to the west of the site is Wynstrode Farmhouse (Minstrels Wood) which is a Grade II Listed. The site is also located within the wider setting of Summers Place (approx. 420 metres to the east). The site is within Flood Zone 1 and is therefore at low risk of flooding. The site has good access to the wider highways network with the A29 Stane Street located approximately 230m to the west.

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- 2.4. Public Right of Way 1331 starts to the southwestern corner of the site and Bridleway 1333 runs to the west of the site alongside Aspen Place, where it then joins Okehurst Lane. Bridleway 1333 officially runs through the garden and along the driveway of Aspen Place although the current physical route is along the eastern edge of the application site. The bridleway remains in place and can be accessed by users however, this alternative route provides a wider and more logical route which would likely be favoured by horse riders. The application includes a proposal to amend the bridleway to create a more logical arrangement for members of the public.



Figure 2 - Public Rights of Way (WCC iMaps)

- 2.5. Historically two poultry sheds were present on the land, running parallel from north to south. Following demolition of the western poultry shed, only the eastern shed now remains albeit that the footprint of the western shed can still be seen on site as identifiable on Figures 1, 2 and 3.



Figure 3 - Photograph of the existing site showing the existing footprint.

3. Planning History

- 3.1. The following is a record of the planning applications pertaining to the site which are considered the most relevant.

- 3.2. **PE/21/0150** Pre-Application response- Demolition of existing chicken shed and redevelopment of land for 4 no. commercial units of flexible Egi (light industrial) and B8 (storage) use, associated access, parking and landscaping.

The Councils response concurred that an opportunity exists for development at the site whilst identifying concerns relating to the scale of development and increased level of activity from light industrial use in particular. Further comments were raised in relation to the impacts on the character of the area, landscaping, impact on neighbouring heritage assets and neighbouring amenity.

- 3.3. **PE/19/0201** Pre-Application response - Redevelopment of site to provide flexible workspace for specialist companies to relocate to and/or for new start-up companies.

The Councils response stated that they would be supportive of a high-quality development which would have the potential to provide an environmental and visual improvement to the existing site. Any new development should comprise a layout, design, scale and palette of materials which reflects and respects the rural location of the area.

- 3.4. **DC/17/0081** Full application for a proposed settled gypsy accommodation site following demolition of existing commercial storage barn - Refused 10.04.2017

- 3.5. **DC/16/1067** Use of land as cab style static caravan park - Withdrawn - 22.06.2016

- 3.6. **DC/16/0511** Partial demolition to create 4 x 125m² storage buildings – Demolition rejected – 31.03.2016

- 3.7. **DC/15/2436** Demolition of the existing storage barn and erection of 2 detached dwellings – Refused – 08.02.2016 (Appeal, dismissed - Reference: APP/Z3825/W/16/3151676)

- 3.8. **DC/15/0994** Proposed change of use from B8 storage building to four dwellings – Prior Approval Refused – 29.06.2015 (Appeal, dismissed – Reference: APP/Z3825/W/15/3137674)

- 3.9. **DC/04/2801** Removal of condition 3 (no vehicle shall be stored unless owned or registered to Mr C.Griffin or Poplar Garages) and Condition 4 of BL/59/84 (shall ensure only for the benefit of present occupiers of the land namely Mr K.C Griffin and Poplar Garages) – Permitted - 20.06.2005

- 3.10. **DC/04/2674** Adaption and retention of 1.8m high boundary fence – Refused - 13.01.2005

- 3.11. **DC/04/2016** Erection of a replacement boundary fence – Refused – 27.10.2004

- 3.12. **BL/63/03** Certificate of lawful use to determine land and buildings are used for general storage B8 use - Partial Permitted – 25.09.2003

4. The Proposal

- 4.1. The proposal seeks to provide the following development:

“Full Planning Application for the provision of 2 Storage and Distribution Units with vehicular access, landscaping and parking”

- 4.2. The proposals include the demolition of the existing single storey poultry shed on the eastern side of the site, which has a footprint area of 1009m². The poultry shed to the western side of the site has previously been demolished, although the floor slab still remains and measures at 1139.8m².
- 4.3. The proposed development includes the construction of 2no. new, single storey, storage buildings on the site, sitting on the footprints of the two existing buildings.
- 4.4. The eastern building has been designed as a long rectangular building north/ south and has a Gross Internal Floor Area (GIA) of 948.4m². The western building has been stepped at the midpoint so as to respond to the western boundary and the diverted PRow and will provide a GIA of 947.8m².
- 4.5. The site will utilise the existing access and entrance gates off Okehurst Lane. A new internal road is proposed between the two buildings providing access to the southern ends of the buildings and additional car parking.

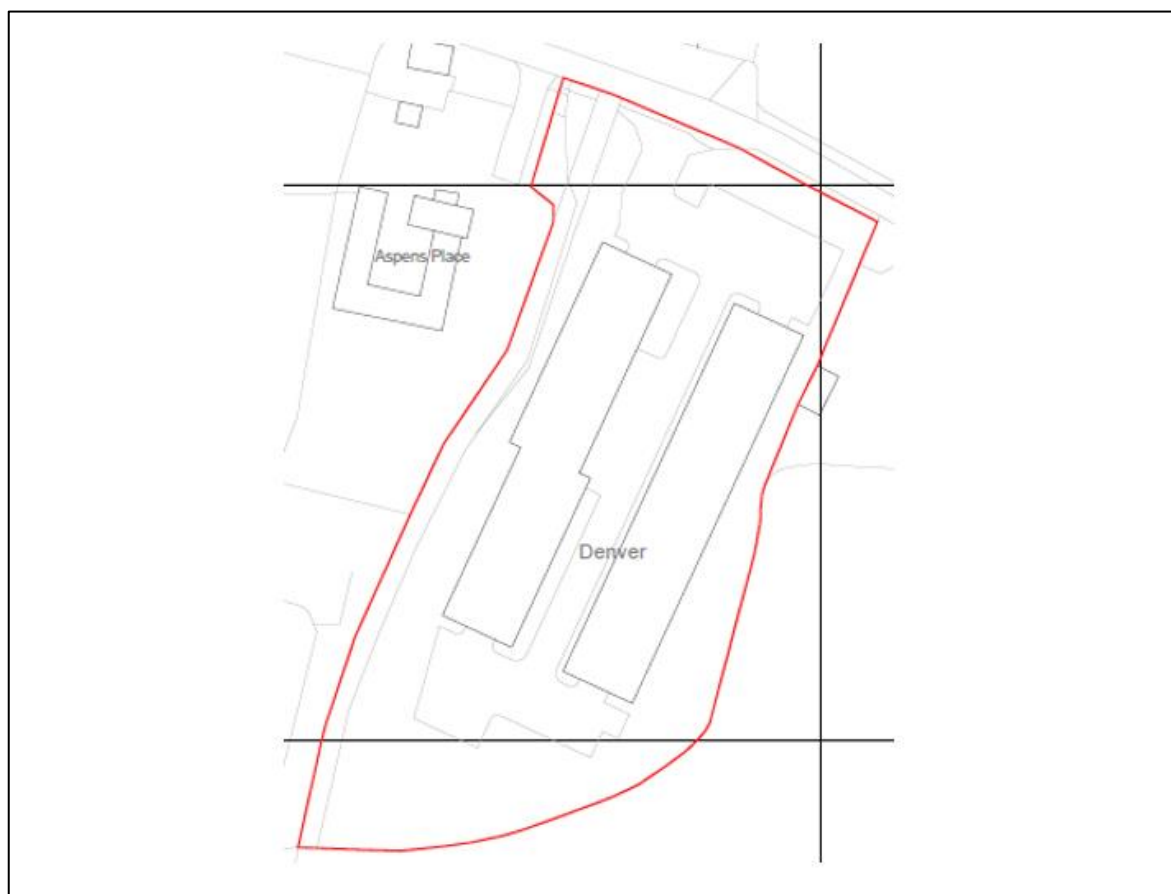


Figure 4 - Proposed Block Plan

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- 4.6. The design of the proposed scheme has been influenced by the site constraints, and Pre-Application feedback from the Council. The two proposed buildings have been positioned on the footprints of the original buildings as this was deemed to reduce the impact of the development within the site's context.
- 4.7. Both buildings have been designed to be accessed at both the northern and southern ends, with a further central access provided on the eastern façade of the western building. Office space and welfare provision are included to both the northern and southern ends of the buildings to provide flexibility to the buildings use as well as creating interest and breaking up the gable ends of the buildings. The internal space within each building is to sub-divided into smaller lock-up style storage spaces of varying sizes. The lockups will comprise of lightweight metal partitioning systems to create flexibility within the internal layout.
- 4.8. In response to the Pre-Application comments, the scheme has been reduced to 2no. buildings, which have been located to echo the past built form positions on the site and the eaves levels have been reduced to 4.5m, which dramatically reduces the potential visual impact of the scheme within the site context. The buildings have been designed as atypical industrial type structures with steel portal frames providing the primary structure and insulated profiled metal cladding systems specified for the roof and walls.
- 4.9. The profile metal cladding, although uninsulated, is a common material on many modern agricultural buildings, therefore the specification of the cladding is not out of keeping for the rural setting.
- 4.10. The specified material palette is muted and understated so that during all seasons when either the trees provide obscured views of the site, or during winter when the buildings would be more visible, therefore reducing the visual impact of the scheme. The roofing colour is to be Umber Grey, and the walls are to be *Camouflage* with a slate blue engineering brickwork plinth.
- 4.11. A total of 27 car parking spaces have been proposed to serve the development. Parking is scattered throughout the proposed development; the spine access provides the structure for the parking with 7 no. spaces provided centrally with the other 20 located to the north and south of the proposed buildings.
- 4.12. With regards to landscape and vegetation, the majority of the existing trees and landscaping surrounding the site are proposed for retention and enhancement. Opportunities have been taken to provide significant additional landscaping, both within the site and to the boundaries as shown on the submitted landscape design. An attenuation pond is also proposed to the south of the development which will provide sustainable drainage and ecology benefits through new habitat creation. The existing trees which front the highway will be predominantly retained and enhanced with complimentary tree species, with some replacement near the proposed bridleway access to minimise impact on the street scene and retain the rural character of Okehurst Lane. The Landscape Design Strategy addresses the overall landscaping approach in detail.
- 4.13. As discussed above, the planning application includes a request under s257 TCPA90 for an alternative bridleway arrangement to be included as part of the development proposals. The aspiration is to have this route formally adopted in place of the existing bridleway which runs through the curtilage of Aspen Place. A new native hedgerow is proposed along the entirety of the eastern boundary of the site, replacing an unsightly chain link fence with significant visual amenity and ecology benefits. The new footpath would have greater accessibility and would allow for the impact to be reduced on the properties within the locality. Furthermore, the new footpath would be to a higher standard which will improve accessibility to the countryside beyond.

5. Policy Overview

5.1. Introduction

- 5.1.1. A key role of the planning system is to regulate the development and use of land in the public interest. At the heart of the planning framework are Statutory Development Plans, which seek to guide the decision-making process. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires, that where the Development Plan contains relevant policies, and application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.1.2. In this case, the Development Plan comprises the adopted Horsham District Planning Framework 2015 and the Billingshurst Neighbourhood Plan 2019-2031. The National Planning Policy Framework, the National Planning Policy Guidance and Supplementary Planning Guidance are material considerations.

5.2. National Planning Policy Framework (NPPF)

- 5.2.1. The NPPF was adopted in 2012 and revised in July 2021, at its heart is the presumption in favour of sustainable development.
- 5.2.2. Section 11 of the NPPF seeks for developments to make ‘effective use of land’ and states at paragraph 119 that *‘planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.’*
- 5.2.3. Paragraph 124 notes that Planning policies and decisions should support development that makes efficient use of land, considering:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use
 - d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - e) the importance of securing well-designed, attractive and healthy places.

5.3. Planning Practice Guidance (PPG)

- 5.3.1. Planning Practice Guidance (PPG) supplements those overarching objectives of the National Planning Policy Framework. Those elements of the PPG that are considered most pertinent in the determination of this planning application relate to the flood risk and coastal change, conserving and enhancing the historic environment, and the importance of good design.

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5.4. Horsham Local Plan (Draft) 2019-2032

- 5.4.1. The Horsham Local Plan 2019-2036 is only in draft form having reached Regulation 18 stage, although publication of the Regulation 19 version has recently been postponed. The draft Local Plan does not currently carry any weight in the determination of applications.

5.5. Horsham District Planning Framework (2015)

- 5.5.1. The Horsham District Planning Framework (HDPF) was formally adopted in November 2015. The spatial strategy within the HDPF promotes development to be focused in and around Horsham itself as the key settlement, and growth is allowed for the rest of the District within settlement boundaries in accordance with the identified hierarchy.

- 5.5.2. The Framework policies considered relevant to the proposed development are listed below and discussed in further detail within Section 6 of this Planning Statement.

- Policy 7 – Economic Growth
- Policy 10 – Rural Economic Development
- Policy 25 – District Character and Natural Environment
- Policy 26 – Countryside Protection
- Policy 33 – Development Principles
- Policy 35 – Climate Change
- Policy 38 – Flooding
- Policy 40 – Sustainable Transport
- Policy 43 – Community Facilities, Leisure, and Recreation

5.6. Billingshurst Parish Neighbourhood Plan 2019-2031 (2021)

- 5.6.1. The Billingshurst Neighbourhood Plan was formally made on 23rd June 2021. The plan aims to guide development within the Parish and has a focus on providing sustainable development whilst protecting and enhancing heritage assets and natural environment.

- 5.6.2. The Neighbourhood Plan policies that are considered relevant to this application are listed below and discussed in further detail in Section 6 of this statement.

- Bill 1 – Billingshurst Built Up Area Boundary
- Bill 3 – Energy Efficiency and Design
- Bill 10 – Flexible Workspaces
- Bill 16 – Multi-value Sustainable Drainage Systems

6. Planning Appraisal

6.1. Introduction

6.1.1. The principal issues in relation to this proposal are as follows:

- Principle of Development
- Rural Economic Development
- Design, Layout, Appearance
- Heritage
- Ecology, Trees, and Landscaping
- Contamination and Pollution
- Highways

6.2. Principle of Development

6.2.1. The application site is located outside of the defined built-up area boundary of Billingshurst where Policy 26 of the HDPF applies. Under Policy 26, proposals within the countryside are permitted where development is essential to its countryside location, and demonstrates that it either: supports the needs of agriculture or forestry; enables the extraction of minerals or the disposal of waste; provides for quiet recreational use, or; enables the sustainable development of rural areas. The site is Previously Developed Land with established B8 storage planning use and former agricultural uses within the large, unsightly existing poultry shed, concrete slab and rubble associated with a previous poultry building. Redevelopment and/or enhancement of the site is deemed to be *essential* – it is a significant visual detractor to the local environment and will remain as such until a viable reuse is carried out and therefore meets this requirement of Policy 26.



Figure 5 - Current Site Condition

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- 6.2.2. The proposals also constitute the *sustainable development of rural areas*, meeting this requirement of Policy 26. The scheme is inherently sustainable as it constitutes the reuse of previously developed land that is a significant visual detractor with the existing poultry shed in an advanced state of decay and the remainder of the land being unsightly, despite management by the owners. The site has an extant and implemented B8 storage use that can be utilised at any time for storage, which would mostly likely be container storage. Despite the site's location in the countryside, the proposals will not affect any greenfield land and will result in economic benefits through new business floorspace, environmental benefits from new landscaping and ecological opportunities and social benefits of new employment provision, as required by the National Planning Policy Framework (NPPF), demonstrating compliance with Policy 26 of the HDPF.
- 6.2.3. Policy 26 also requires that development must be of an appropriate scale for its countryside location, where it does not lead to a significant increase (independently or cumulatively) in overall activity levels within the countryside, and where it protects, conserves or enhances the key features and characteristics of the landscape character area within which it is located.
- 6.2.4. The applicants have pursued Pre-Application discussions with HDC and reviewed the scale, layout, use and appearance of the proposals as a consequence. HDC raised concerns regarding scale and quantum of floorspace and therefore two buildings to the north of the site have been removed entirely and the layout rationalised to replicate the footprint of the two poultry sheds which remain partly in situ. The proposals are single storey in height in line with advice received from Planning Officers who considered that some development is appropriate here.
- 6.2.5. In terms of activity, Officers raised concerns about the light industrial scheme submitted for Pre-Application feedback and consequently the applicant has amended the proposals to be for storage use only. This will by nature be less intensively used (through vehicular trips and general noise generation) and importantly, a storage use is well established at the site and can be carried out at any time. There will be some intensification of use at the site, but this is inevitable as the current use is significantly underutilised due to the dilapidated condition of the former Denver Poultry Farm site. It is a matter of fact that the area of the site with lawful storage use can be used for open storage with only a height limit of 3m on any structures stored on site (this would allow for container storage for example).
- 6.2.6. Policy 26 requires the protection and enhancement of key features and characteristics of the landscape character area within which a site is located and it is clear that the proposals will be a considerable visual improvement to the existing dilapidated building and surrounding site. The simple, industrial type buildings will be single storey and be reflective of the former agricultural use which has framed the character of this area for many years. The scheme will be supplemented with an extensive landscaping scheme, enhancing site boundaries but also providing extensive soft landscaping within the development and a range of biodiversity enhancement and SUDS measures such as a balancing pond, new hedgerows and tree and shrub enhancement throughout, ensuring Biodiversity Net Gain (BNG) across the site.
- 6.2.7. In summary, the proposals are considered to be a highly appropriate use of the site which already benefits from the established B8 use and long standing former agricultural uses and is therefore compliant with Policy 26 of the HDPF.
- 6.2.8. In addition, Policy 10 of the HDPF refers to Rural Economic Development, stating that sustainable rural economic development and enterprise will be encouraged within the District to generate local employment opportunities and economic, social and environmental benefits for local communities. The supporting text recognises the contribution made by the rural economy to Horsham District and in turn the Gatwick Diamond.

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- 6.2.9. It is considered that there is a clear, justifiable, and ongoing need for high quality employment space within Billingshurst and the wider Horsham District. The Billingshurst Neighbourhood Plan (2021) (Page 10 - 'Issues for Billingshurst') highlights a 'shortfall in employment space' with 'Employers in the parish having] stated [that] there is demand for fit for purpose business space. However, the Neighbourhood Plan includes no proposed allocations of sites or land to help meet the employment shortfall or the issues identified.
- 6.2.10. In relation to the wider Horsham District, the Northern West Sussex Economic Growth Assessment, published in January 2020, sets out a need for around between 35 and 39 ha / 154,940 sqm and 157,710 sqm of 'B class' business floorspace within the District, the delivery of which is being restricted by current delays in Local Plan Review progress and delays to the implementation of strategic sites. It suggests supporting larger schemes such as North Horsham with new developments in smaller locations and settlements within the District.
- 6.2.11. Policy 7 of the HDPF states that the redevelopment, regeneration, intensification and smart growth of existing employment sites will be supported. As noted above the site has established B8 use, and the proposals seek the sustainable redevelopment of the current untidy and vacant site.
- 6.2.12. Although currently delayed, the Policy position set out in the emerging Local Plan also recognises the importance of allowing for adequate employment space within the District, both within the built-up area boundary and within rural areas. Under Chapter 5 (economic development) the draft Plan sets out an ongoing need to enhance the rural economy including enabling diversification of rural employment space. This demonstrates a continued recognition of the shortfall in employment floorspace within countryside locations and an ongoing commitment by HDC to provide diverse employment space and opportunities across the District.
- 6.2.13. Policy BILL 1 of the Billingshurst Neighbourhood Plan is relevant to the proposals and the proposals are clearly compliant with Criterion B of the policy which requires that,
- 6.2.14. *B Development proposals outside the proposed built-up area boundary will only be supported where:*
i. it is in accordance with the development plan policies on appropriate uses in the countryside;
- 6.2.15. As summarised in this Statement, the proposals are considered to be both an appropriate use in the countryside and in accordance with the development plan.
- 6.2.16. The site is previously developed and with established B8 storage planning use and former agricultural uses within the large, unsightly existing shed, concrete slab and rubble associated with a previous poultry building (as identified in Figure 5). Redevelopment and/or enhancement of the site is essential as the site is a significant visual detractor to the local environment and will remain as such until a viable reuse is carried out. The proposed development seeks to expand an existing rural employment site through sympathetic design which has had due consideration to its countryside location, opportunities, and constraints. The redevelopment of the site would improve local offerings for employment space and would meet local needs. With regard to the required design criteria under Policy 10, the proposed design is able to meet these requirements through a sympathetic design and layout, supplemented by extensive landscaping and biodiversity enhancements (as explored in detail below).
- 6.2.17. The NPPF seeks for developments to make 'effective use of land' and the reuse and sustainable redevelopment of this site is compliant with that objective, helping to restrict the use of greenfield land. The principle of development is fully compliant with the development plan, in this case the Policies 7, 10 and 26 of the HDPF and Policy 1 of the Billingshurst Neighbourhood Plan.

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6.3. Design, Layout and Appearance

- 6.3.1. With regard to design, layout and appearance, the proposed design has had due regard to the opportunities and constraints presented by the site, as well as policy requirements and has been fully informed by appointed heritage, landscape and ecological reports.
- 6.3.2. Policy 10 of the HDPF requires development to be designed to maintain the quality and character of the area. It also sets out a number of more specific criteria which must be met to make rural economic development acceptable.
- 6.3.3. In the first instance, the Policy takes a sequential approach to development, requiring existing employment sites to be contained where possible within the boundaries of the site and preferring the conversion of existing buildings over the construction of new development.
- 6.3.4. In compliance with this criterion, the proposal is contained within a defensible site boundary and seeks to improve on the existing lawful B8 use. The feasibility of converting the remaining chicken shed was explored at initial design stage however the structure is in a poor state of repair and difficult to re-develop in a way that would bring forward a high standard of design. In light of this and the pre-application feedback from HDC, it was considered preferential to propose new buildings to maintain the same footprint as the poultry sheds, as shown on the supporting plans and elevations.
- 6.3.5. Policy 10 further requires all new build employment floor space to result in environmental improvement and reduce the impact of development on the countryside. The site is a brownfield site which has been in a dilapidated condition for a number of years. The site is currently on the “risk register for illegal traveller occupation” following a 6-month period of illegal occupation in 2014 and an attempted occupation in 2017. The general dilapidated condition has led to a poor experience for residents and users of the adjoining PROW / Bridleway which is uncharacteristic of its rural countryside setting.
- 6.3.6. With current legislation emphasising environmental improvements, this site would achieve significant improvement through site clearance and the removal of the unsightly and potentially hazardous poultry shed which is of no architectural merit. The scheme would also provide an integrated ecology and landscaping strategy for the site which enhances the site significantly. To ensure the improvement of the site in ecological terms the western boundary of the site would benefit from a new hedgerow which would largely shield the site from view and enhance the countryside experience for users of the Bridleway along this boundary in accordance with Policy 10. Furthermore, native species of trees would be introduced to the roadside and retention of the existing trees have been key in the consideration of layout and design to ensure an enhancement to the ecology throughout the site.
- 6.3.7. Finally, Policy 10 requires car parking to be accommodated within the immediate surroundings of the buildings or via an alternative, logical solution. The layout plan as submitted demonstrates that sufficient parking can be accommodated within the boundaries of the development site within close proximity to the proposed units.
- 6.3.8. In more general terms, policies 32 and 33 also requires development to result in a high standard of design and relate sympathetically to its built surroundings, landscape, and open spaces within and adjoining the site. Developments are required to be of an appropriate scale, massing and appearance, make efficient use of land and prioritise previously developed sites.

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6.3.9. As above, the development would result in a functional development which also utilises a traditional agricultural style associated with the setting outside the built-up area boundary as demonstrated by the accompanying drawings. Consideration has been given to the siting of development, with buildings located on the existing footprints of the poultry sheds with open space and car parking retained to the north and south. The units are proposed to be one storey and are set back from the site boundaries to protect neighbouring amenity and countryside character. The development is easily contained and accommodated within the site boundaries and is relative in terms of scale and massing to past uses and structures on the site, as well as neighbouring properties and surrounding development.

6.3.10. For these reasons, it is considered that the proposed design would meet the criteria set out under Policies 10, 32 and 33 of the HDPF and would therefore be acceptable in terms of design, massing and appearance.

6.4. Heritage

6.4.1. There are no listed buildings located within the site however, Wynstrode Farmhouse (Minstrels Wood) is located approximately 80m to the west and is Grade II listed. There are also a number of 'non-designated heritage assets' in close proximity of the site. These include Aspen Place, immediately to the west, and The Barn, which is located to the northwest of the site. Within the wider vicinity of the application site is Summers Place (Grade II listed) which is located approximately 473m to the southeast and Copped Hall (Grade II listed) located approximately 855m to the northwest.

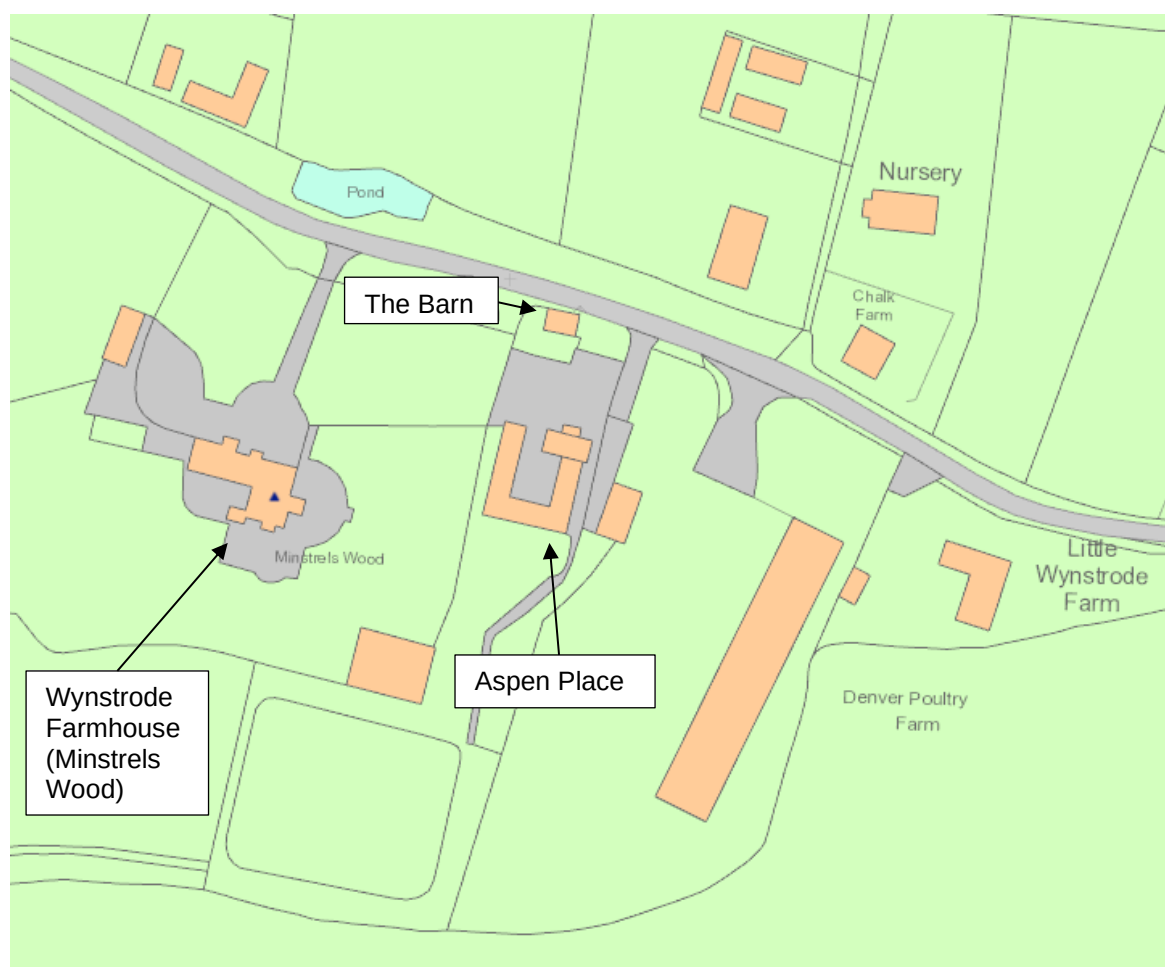


Figure 6 - Location of Heritage Assets

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- 6.4.2. In accordance with Section 16 of the NPPF (2019) and Policy 34 of the HDPF, the significance of these designated and non-designated heritage assets has been explored and the impact of the proposal on these heritage assets assessed and used to inform the proposed scheme, evidenced by the attached Heritage Statement.
- 6.4.3. With regard to Wynstrode Farmhouse (Minstrels Wood), the Statement concludes that there is limited inter-visibility between the heritage asset and the site due to existing vegetation. Some glimpsed views of the roof of the farmhouse are possible from the southwestern part of the site however this area is proposed for car parking and therefore retains the glimpsed view of Wyndstrode Farmhouse (Minstrels Wood) from this section of the site. In general, the new buildings are proposed to the northern end of the site and will not be legible in the context of the heritage asset because of the existing natural screening. The proposed design and existing vegetation therefore ensure that no harm will occur to the setting of Wyndstrode Farmhouse (Minstrels Wood) as illustrated in Figure 4 below.



Figure 7 - Photograph Looking West Towards Wynstrode Framhouse (Minstrels Wood)

- 6.4.4. With regard to the non-designated heritage assets, the Heritage Statement concludes that the site benefits from natural screening to its northern boundary which restricts any notable views of the proposed structures from Okehurst Lane. This ensures that the new development is unlikely to be perceived in the context of Aspen Place and the Barn from Okehurst Lane. Enhanced screening has been proposed to the northwest of the site as well as the restriction of building heights to one storey to soften legibility of the site in the context of Aspen Place and minimise any impact on setting.
- 6.4.5. With regard to the Summers Place and Copped Hall, it is considered that these heritage assets are of sufficient distance from the site to ensure that the proposal will have no impact on their settings. There is very limited to no inter-visibility between these heritage assets and the site.

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- 6.4.6. As such the proposed development would sustain and enhance the historic environment through positive management of the proposed development in accordance with Para 189 of the NPPF and Policy 34 of the HDPF.

6.5. Ecology, Trees and Landscaping

- 6.5.1. Policy 25 of the HDPF states that the natural environment and landscape character of the district, including the landscape, landform and development pattern, together with protected landscapes and habitats will be protected against inappropriate development.
- 6.5.2. The Applicant has carried out Preliminary Ecology and follow up surveys of the site. This found that the habitats directly affected by the development are of low value. The proposals are accompanied by a detailed landscape scheme, which have been designed in collaboration with the ecologists, include a wide range of ecological enhancements and will result in Biodiversity Net Gain.
- 6.5.3. With regards to trees the PEA concluded that the boundary trees surrounding the site were generally of local value and should be retained and protected. This is in accordance with the findings of the Arboricultural Survey which only recommends the removal of one Ash tree to the southeast boundary of the site, which is on poor condition. Leyland Cypress to the northwest of the site entrance will be removed, partly to accommodate the new PRoW but also as they provide limited value. They will be replaced by native species. All other trees are however, at this stage, proposed for retention, with further planting to be introduced.
- 6.5.4. In terms of landscape impacts, the scheme includes a detailed Landscape Design Strategy and Landscape and Visual Appraisal (LVA) that have fed into the evolution of the scheme design and layout. The detailed landscaping scheme includes considerable amounts of additional soft landscaping along and around the site boundaries with enhancement to existing boundary screening wherever possible, resulting in biodiversity net gain. A new native hedgerow is proposed along the entirety of the eastern boundary of the site, replacing an unsightly chain link fence with significant visual amenity and ecology benefits. To the south of the site a new balancing pond is proposed as part of the overall surface water management as well as contributing to the overall enhancement strategy by creating new habitats within the site. Around the pond there is opportunity to vastly improve the ecological credentials of the site.
- 6.5.5. The LVA considers that the development at one storey in height is of an appropriate scale and massing for the site's countryside location and the and pattern of development also appropriate for this location. The site is well shielded from the surrounding countryside by existing vegetation with only glimpsed views of the site from all boundaries. As discussed above, the re-development of the site would result in site clearance and the construction of simple storage buildings, as opposed to the dilapidated poultry shed, concrete slab, rubble and poorly maintained vegetation that currently exists on the site.
- 6.5.6. As has been set out above, part of this proposal involves the realignment of Bridleway 1333 so that it runs outside of the curtilage of Aspen Place. This will form a new revised route which runs along the side of the proposed development. The eastern side of this revised route would benefit from the planting of a new hedgerow which would shield the proposed development from view whilst still allowing for glimpsed views of Aspen Place and the wider countryside. The route would be of high quality and provide an upgraded Bridleway.

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- 6.5.7. The proposals are clearly compliant with Policies 32 and 33 of the HDPF as they constitute good, sustainable design and considerable landscape improvements over the existing situation. The proposals make efficient use of land, integrate effectively with the character of the surrounding area, use high quality and appropriate materials, and enhance the existing landscape structure of the site and surrounding area and ensure that there is no conflict with the character of the surrounding landscape.

6.6. Contamination and Pollution

- 6.6.1. Policy 24 of the HDPF requires developments to minimise exposure to and the emission of pollutants including noise, odour, air and light pollution. In terms of land contamination Policy 24 explicitly requires the delivery of appropriate remediation.
- 6.6.2. With regard to noise, odour and air pollution it is not anticipated that the proposed uses would result in any unacceptable levels of pollution. Lighting of the site will also be kept to a minimum with only low level lighting utilised where necessary for public safety.
- 6.6.3. A Phase 1 contamination survey has been completed which considered all previous uses of the site. This did not deem any intrusive investigations to be necessary but recommended the following precautionary measures:
- removal of rubble piles by a licensed waste contractor;
 - ensuring water mains do not lie within contaminated soils;
 - industrial hygiene measures to be engaged by workers on site;
 - should unexpected contamination be identified then the Council should be notified and remediation work carried out as required.
- 6.6.4. The application is submitted with a contamination report as such the proposal is considered therefore to meet the requirements of Policy 24 of the HDPF.

6.7. Highways

- 6.7.1. Policy 41 of the HDPF requires safe and suitable access to be provided for all road users. The Applicant has instructed a Highways and Transport Consultant who has reviewed the proposed design. They have concluded that adequate visibility splays can be achieved from the site onto the highway, allowing for safe access for all road users in accordance with Policy 41 of the HDPF. The proposed storage use will result in limited traffic movements throughout the working day and as set out in the accompanying Transport Statement, there will be little impact in terms of traffic generation. The site has established use for storage (ref: BL/63/03) across part of the site and there will be only minimal increases over that use or indeed, the historical use of the site as a poultry farm.
- 6.7.2. In terms of parking, Policy 10 requires new commercial development to provide adequate on-site parking. This supports Policy 41 of the HDPF which requires adequate parking and facilities to be provided within developments to meet the needs of anticipated users. Consideration has been given to the needs of cycle parking, motorcycle parking, charging plug-in or other low emission vehicles and the mobility impaired. The development proposes 27 car parking spaces. Suitable cycle parking and electric charging point provision will also be provided.

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- 6.7.3. In addition, the site is in proximity to sustainable modes of transport, with the A29 bus stop for routes from Horsham being less than 10 minutes' walk from the site. The sustainability and importance of this route is highlighted in the emerging HDPF which recommends new bus services from Horsham to Billingshurst.

7. Conclusion

- 7.1 In conclusion, the proposed “*Full Planning Application for the provision of 2 storage buildings, with vehicular access, landscaping and parking*” has been assessed against all relevant National and local planning guidance, policies and all other material considerations and is considered to be acceptable.
- 7.2 The site is previously developed and with established B8 storage planning use and former agricultural uses within the large, unsightly existing shed, concrete slab and rubble associated with a previous poultry building. It is a matter of fact that a large area of the site has lawful storage use can be used for open storage with only a height limit of 3m on any structures stored on site (this would allow for container storage for example).
- 7.3 Redevelopment and/or enhancement of the site is essential as the site is a significant visual detractor to the local environment and will remain as such until a viable reuse is carried out. The proposed development seeks to expand an existing rural employment site through sympathetic design which has had due consideration to its countryside location, opportunities, and constraints. The redevelopment of the site would improve local offerings for employment space and would meet local needs. With regard to the required design criteria under Policy 10, the proposed design is able to meet these requirements through a sympathetic design and layout, supplemented by extensive landscaping and biodiversity enhancements.
- 7.4 The NPPF seeks for developments to make ‘effective use of land’ and the reuse and sustainable redevelopment of this site is compliant with that objective, helping to restrict the use of greenfield land. The principle of development is fully compliant with the development plan, in this case the Policies 7, 10 and 26 of the HDPF and Policy 1 of the Billingshurst Neighbourhood Plan.
- 7.5 It has been demonstrated that the design is appropriate and respectful of surrounding rural character in accordance with the design criteria of Policy 10, as well as being compliant with Policies 32 and 33 of the HDPF. The proposal would be sympathetic to the surrounding heritage assets, both designated and non-designated, and presents an improvement to the landscape and ecology of the existing site and biodiversity net gain.
- 7.6 In terms of highways, the site is well located in close proximity to the A29 Stane Street and would provide safe and suitable access to Okehurst Lane whilst easily accommodating the required level of parking on site. It is therefore considered that the proposed development would result in a high-quality rural employment site which is able to meet a locally identified need.
- 7.7 The development is considered to be fully consistent with the development plan and the aims and objectives of the National Planning Policy Framework.