

Planning Statement

**Land North of The Old
Brickworks, Shoreham Road,
Henfield**

Construction of a complex of 4no. buildings comprising of 12no. light industrial units for employment use (office, industrial, storage and distribution uses (B2, B8 &E(g) use)) with associated car parking, access and landscaping.

at

Land North of The Old Brickworks, Shoreham Road,
Henfield

Planning Statement
on Behalf of
SABBG Holdings Ltd

January 2026

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1. Introduction

- 1.1 This Planning Statement is written on behalf of SABBG Holdings Ltd in support of the submission of a full planning application for the construction of a complex of 4no. buildings comprising of 12no. light industrial units for employment use (office, industrial, storage and distribution uses (B2, B8 &E(g) use)) with associated car parking, access and landscaping.
- 1.2 The application is made in accordance with the Planning and Compulsory Purchase Act 2004.
- 1.3 This Statement considers the Site and surrounding area, planning history, the scheme itself, relevant planning policy and provides an appraisal of the scheme in light of these considerations. It concludes that the proposal is a carefully considered scheme that meets guidance contained in the Development Plan and the National Planning Policy Framework.
- 1.4 This Statement also includes details regarding Community Involvement and public consultation.
- 1.5 In addition to this Planning Statement, the following reports have been prepared in support of this application:

REPORT	CONSULTANT
Design and Access Statement	PRC Architecture
Tree Survey and Arboricultural Impact Assessment	Broad Oak Tree Consultants
Transport Assessment	Motion
Framework Travel Plan	Motion
Outline Biodiversity Net Gain Summary	Ecology Partnership
Ecological Impact Assessment and Ecological surveys	Ecology Partnership
Flood Risk Assessment & Drainage Strategy Report	HOP Consulting
Landscape & Visual Impact Assessment (LVIA)	Lizard Landscape

Noise Assessment	RWDI
Mineral Resource Assessment	Cuesta
Air Quality Assessment	RWDI
Desktop Land Contamination Report	Landmark

1.6 The following plans and drawings have been submitted in support of the application .

REFERENCE	TITLE	SCALE
PL 001	Location Plan	1:1250 @ A1
PL 002	Existing Site Layout	1:500 @ A0
PL 003	Proposed Site Layout	1:500 @ A0
PL 004	Proposed Site Layout with Roof Plan	1:500 @ A0
PL 005	GEA Schedule	N/A
PL 101	Building 1 - Ground Floor Plan	1:100 @ A1
PL 102	Building 1 - First Floor Plan	1:100 @ A1
PL 103	Building 1 - Roof Plan	1:100 @ A1
PL 104	Building 1 - Elevations	1:100 @ A1
PL 201	Building 2 - Ground Floor Plan	1:100 @ A1
PL 202	Building 2 - Roof Plan	1:100 @ A1
PL 203	Building 2 - Elevations	1:100 @ A1
PL 301	Building 3 – Ground Floor Plan	1:100 @ A1
PL 302	Building 3 – First Floor Plan	1:100 @ A1
PL 303	Building 3 – Roof Plan	1:100 @ A1
PL 304	Building 3 – Elevations	1:100 @ A1
PL 401	Building 4 – Ground Floor Plan	1:100 @ A1
PL 402	Building 4 – First Floor Plan	1:100 @ A1
PL 403	Building 4 – Roof Plan	1:100 @ A1
PL 404	Building 4 – Elevations	1:100 @ A1

2. The Site and Surroundings

- 2.1 The Site is located on the western side of Shoreham Road, it is situated approximately 2.5km from the centre of Henfield and approximately 550m from Small Dole. It is allocated in the Henfield Neighbourhood Plan (HNP) as an employment development site.
- 2.2 The built-up-area of Henfield lies approximately 1.6km to the North on London Road. Henfield is defined as a Category 1 settlement which is the second category of settlement hierarchy in the District as set out in the Horsham District Planning Framework (2015), second only in the hierarchy to the Main Town of Horsham. Henfield therefore offers the typical services you would expect from a large Village including shops, schools and a leisure centre.
- 2.3 The Application Site is broadly rectangular in shape and currently comprises of undeveloped open interlinked fields, which are lined at the boundaries with trees, shrubs and hedges. The majority of the site comprises of horse paddocks utilised as grazing fields. The A2037 (Shoreham Road) bounds the application Site to the east and Newbarn Lane lies to the west beyond open land.
- 2.4 Overall, the Site measures approximately 3.27 hectares in area, the development land measures approximately 1.97 ha, and the adjoining land to the west which is to be utilised for ecological enhancement and BNG purposes measures approximately 1.3 ha.
- 2.5 The site is located to the north of the established commercial and employment site of Sweeptech Environmental Services and Edburton Contractors, and a recently partly constructed and occupied commercial site (formerly known as The Old Kennels Site). The surrounding uses are also primarily commercial, including Henfield Business Park to the east, which is located opposite the site. The surrounding area is therefore considered to be predominantly commercial / employment.
- 2.6 There are a former landfill and disused brick works site to the south-west of the site, which is now covered by an landscaped cap.
- 2.7 Henfield Business Park is located approximately 20m to the east on the opposite side of Shoreham Road with the clubhouse for Horton Golf Club located approximately 250m further east. Henfield Business Park accommodates a number of small businesses including storage and light industrial users. The immediate surrounding area is predominantly commercial / industrial / employment uses, beyond this the area in general is sparsely populated and semi-rural in nature with the predominant land use being agricultural.

- 2.8 The closest residential properties are located to the northern boundary of the site and the northwest of the site. There are also a number of residential properties located approximately 300m further to the north and northwest of the site.
- 2.9 The context of the application Site can be seen in the image below.



Site Location (not to scale) Application Site outlined in red. Image taken from Design & Access Statement by PRC

- 2.10 The application Site currently benefits from vehicular access from Shoreham Road via a farm gate which is used in connection with the residential property to the north. This access point is to be extinguished and access to the proposed commercial site will be via the recently constructed neighbouring commercial site to the south, (which was granted planning consent in October 2020 under ref: DC/20/0049) and will share the same access point from Shoreham Road.
- 2.11 Planning consent DC/20/0049 allowed for a new access from Shoreham Road which has since been constructed. As part of this planning consent a short section of footway has been constructed north of the site access, this also includes a new pedestrian crossing point and refuge island with tactile paving. Full details of the proposed vehicular/pedestrian access to the Site are included in the accompanying Transport Report (Motion).
- 2.12 The Site benefits from being in close proximity to 2no. existing bus stops located directly outside of the site and on the opposite side of Shoreham Road at Henfield Business Park, which can be accessed by the existing footway and pedestrian crossing point outside the site. The bus services at

these stops provide regular services to Henfield, Worthing, Horsham, Pulborough and Burgess Hill and stops between.

- 2.13 The local public transport connections are considered in more detail within the accompanying Transport Assessment which demonstrates that the Site is located in a very sustainable location.
- 2.14 There are no Public Rights of Way or Bridleways within the Site itself, but there are a number of public footpaths in the vicinity of the Site. More details are provided in the accompanying Transport Assessment by Motion.
- 2.15 The roads and topography of the local area are considered suitable for cycling. Therefore, there are strong opportunities to encourage walking and cycling.
- 2.16 The Site is not within any protected landscapes (such as AONB or National Park). Although, the LPA's pre-app responses advises that the Site is within the setting of the South Downs National Park.
- 2.17 The application Site is situated wholly within Flood Zone 1 and as such is considered at low risk of flooding from fluvial and tidal sources. The site is not considered to be a significant risk of flooding from surface water, although mitigations are required, more details of the proposed surface water drainage strategy is provided in the accompanying Flood Risk Assessment and Drainage Strategy (HOP).
- 2.18 There are no Listed Buildings within the Site nor is it located within a Conservation Area. There are no Scheduled Monuments or Historic Battlefields which will be impacted by the proposed development.

3. Planning History

Application Site

- 3.1 There is no relevant planning history on this Site as identified on the Council's online portal.

Relevant other applications

- 3.2 Whilst there is no recent planning history on this Site, there have been previous planning applications in the vicinity of the Site. These primarily concern the commercial development located along the southern boundary of the application Site at the Site formerly known as 'Senlac', which permitted the demolition of a dwelling, kennels, cattery, animal hospital, grooming parlour and office and the erection of 2no. commercial buildings in B1(a), B1(c), B2 and B8 use. The site was allocated for commercial development in The Henfield Neighbourhood Plan (2021).

Pre-application Meeting with Horsham District Council

- 3.3 In May 2023, the applicant submitted a pre-application enquiry to Horsham District Council and an initial pre-application advice meeting took place on site with the Council's Planning Officers in July 2023.
- 3.4 This request was made on the basis of a scheme for 16no. commercial units within 2no. buildings, with a total GEA of 7,340m², and a proposed planning use of B8 (storage and distribution) / commercial use. The Site meeting discussed the site constraints and opportunities.
- 3.5 A full written response was received November 2023. The pre-application advice was supportive of the principal of development on site, noting that the proposed commercial development is located on land which is allocated for employment development in the Henfield Neighbourhood Plan (2021). The pre-app response also noted that in principle the proposal accords with Policies 1 – 4 of the HDPF (2015)
- 3.6 It was considered that some improvements to the layout could be made. The informal Planning Officer feedback received included provision of some smaller units or units with flexibility to sub-divided to enable smaller start-up units to be accommodated. The pre-app response also provided design suggestions such as additional landscape buffering; multi-span buildings rather than single span structures, and the use of overhanging eaves.
- 3.7 The revised proposals have taken on board these suggestions, a number of smaller units suitable for start-up businesses are provided, the floor area has been reduced with a more fragmented building block arrangement to reduce the apparent building bulk, and the landscape buffering offer has been improved.

4. The Scheme

Description of Development

- 4.1 This application seeks full planning consent for the construction of a complex of 4no. buildings comprising of 12no. light industrial units for employment use (office, industrial, storage and distribution uses (B2, B8 &E(g) use)) with associated car parking, access and landscaping.
- 4.2 Access to the site is proposed via a link to the existing light industrial/employment use site to the south (formerly known as Kennels). This would then provide access to the A2037 Shoreham Road.
- 4.3 The layout proposes siting the industrial/commercial units on the eastern half of the application site, with the existing fields to the west are to be utilised for landscaping and BNG / ecological enhancement. The application site measures 32,740m², (3.27ha), the GEA of the proposed commercial units would measure 6,429m², and the land to be utilised for BNG/Ecological enhancement would measure 1.3ha.
- 4.4 The approach to development on the Site is very much landscape-led and has been carefully designed to protect the quality of the wider landscape.

BNG & Ecology

- 4.5 The proposals for BNG on the development site include new wildflower grassland and mixed native shrub planting around the new business park area, with smaller verges to comprise flowering lawn.
- 4.6 The proposals on the western part of the site comprise a new SUDS attenuation basin which will be designed to hold water and function as a pond, whilst the remainder of the grassland on this part of the site will be enhanced through scarifying and seeding of species-rich wildflower mix. In addition, the thick scrub on the site will be enhanced resulting in a more diverse structure, and native trees will be planted throughout the entire site. An Outline Habitat Management & Maintenance Plan (HMMP) has been submitted in support of this application.
- 4.7 Overall the proposals for the site will achieve a 6.23% biodiversity net-gain in habitat units with a total unit deficit of -0.6 units from the 10% BNG target. In order to reach the 10% target an additional 0.49 units of medium distinctiveness 'Grassland' habitat, and 0.11 units of any habitat type is required.
- 4.8 The deficit in BNG will be offset through the purchase of credits from an offsite provider such as the Environment Bank once the application has been approved and detailed landscape design finalised. The proposal therefore

comprises of a combination of onsite and offsite measures in order to meet the required 10% target.

Trees

- 4.9 At the time of the submission of the application no Tree Preservation Orders are present on the site. An Arboricultural Impact Assessment has been produced by Broad Oak Tree Consultants Ltd and is submitted in support of the application.
- 4.10 The development proposes the removal of a total of 13no. trees for removal - 5no. individual trees, eight groups and one part of a group. All but 2no. of the trees to be removed are category C or U, and as such should not represent a constraint to the proposals.
- 4.11 The proposal would include the planting of replacement hedgerows and feature trees in order to address the loss of the existing hedge and Category B trees. In addition, a number of new trees (approximately 90) are to be planted across the site.

Access & Transport

- 4.12 Access to the site will be via the existing light industrial/employment use site located immediately to the south of the Site (known as Southgrounds). This would then provide a shared access to the A2037 Shoreham Road. The existing access road was recently constructed in order to serve the newly constructed industrial site and consists of a bellmouth with 20 metre kerb radii and a ghosted right turn lane, which links to the existing right turn lane servicing Henfield Business Park opposite the site.
- 4.13 The proposed Site access design is of sufficient width to enable the two-way movement of vehicles in line with the Manual for Streets guidance. The access and roadways would be of sufficient width to allow access by HGVs, a fire tender and refuse vehicle.
- 4.14 The roadways within the Site have been tracked and this demonstrates that there is sufficient width for HGV vehicles. Turning heads have been provided and are appropriately sized to ensure vehicles can manoeuvre freely through the Site.
- 4.15 The layout demonstrates that a total of 103 car parking spaces can be provided for the development as well as a communal, secure sheltered cycle storage in accordance with West Sussex County Council standards. Each unit will benefit from a disabled parking space and at least 2no. bays compatible with electric vehicle charging in addition to a loading bay and two cycle parking spaces close to their respective entrances. The accompanying Transport Assessment (Motion) provides further commentary on this matter.

Design and Character

- 4.16 The coloured site layout illustrates how the site has been designed to be in keeping with the existing character of the buildings in the area and with consideration of the constraints and opportunities of the Site.
- 4.17 The design of the proposed buildings and the proposed materials has taken influence from the surrounding industrial and commercial properties. The design, therefore, reflects the local vernacular whilst still ensuring a variety of buildings. Further information is contained within the accompanying Design and Access Statement.
- 4.18 The proposed buildings vary in eaves height from 5m to 7.5m
- 4.19 The proposed buildings have been designed to provide a series of high-quality contemporary buildings with a limited palette of natural and neutral colours which seek to help blend the proposed buildings more sensitively into their landscaped surroundings.
- 4.20 The external materials, boundary walls, hard surfacing and fencing will all be of a similar palette ensuring that the design of the buildings harmonises with the surrounding character of the area. For a detailed assessment of the design of the scheme please see the accompanying Design and Access Statement, this explains more fully the approach to the design of the development.
- 4.21 The design of the scheme has been very much landscape-led and seeks to conserve and enhance the landscape. The boundaries of the Site are well defined by trees scrub and hedgerows and therefore the Site is considered to be very self-contained in the locality. The existing vegetation along the boundaries of the Site would largely be retained and will be enhanced in places with additional planting.

Flood Risk and Drainage

- 4.22 One of the key design principles of the scheme is to provide a drainage strategy utilising an appropriate Sustainable Drainage System including drainage ditches and attenuation basins, providing appropriate drainage features to development edges and within open spaces.
- 4.23 The application is supported by a Flood Risk Assessment & Drainage Strategy report (HOP). The FRA identifies that the Site is wholly located within Flood Zone 1 and is therefore a low risk of flooding. All forms of development are considered acceptable in principle in Flood Zone 1. The Sequential Test is not required as the developable area of the Site is located within Flood Zone 1.

- 4.24 The FRA confirms that the site is at a negligible or low risk of surface water flooding. There are isolated areas of low-risk flood areas within the eastern part of the site, surface water flood risk on this part of the site is to be mitigated by the inclusion of a new SuDS attenuation system.
- 4.25 The western half of the site is to remain undeveloped, therefore the extant surface water flood risk will remain as is in this area and will not be adversely affected by the proposed development.

Drainage - Foul water

- 4.26 The proposed foul water disposal is to be via a package foul water treatment plan located to the west of the main built area of the site. An outfall is proposed to connect to the existing flowing stream in the ditch on the southern boundary of the site. The proposed foul water drainage strategy is as per the existing arrangement for neighbouring sites along Shoreham Road.

Drainage – Surface Water

- 4.27 The ground conditions of the site are not considered to be favourable to a SuDS based on infiltration techniques, as such an attenuated SuDS scheme is proposed with a controlled discharge of surface water runoff to the adjacent watercourse network. The accompanying FRA & Drainage Strategy report (HOP) confirms that the post-development runoff rate is maintained at a rate providing an overall betterment in terms of flood risk to the downstream watercourse.
- 4.28 The FRA & Drainage Report concludes that the proposals on site can be successfully implemented and managed, and there will be no flooding risk to users and neighbouring properties over the design life of the development.

Energy and Sustainability

- 4.29 Sustainability is one of the core principles behind the proposed development of the site. In order to achieve buildings of high sustainability the proposal has been designed to utilise the most appropriate orientation on site, utilise low carbon systems, and operate as passively as practicable.
- 4.30 The proposed buildings have been designed to target a BREEAM 'very good' rating.

The proposed building specifications include highly insulated cladding systems, and a high degree of air-tightness in the building fabric. The orientation of the buildings on site allows for the use of an extensive PV installation with on-site PV battery storage to maximise solar energy use. The buildings have also been designed to incorporate roof lighting and general good day lighting, and high performance glazing.

5. Planning Policy Context

5.1 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, an application for planning permission should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

5.2 In this case, the Development Plan comprises of the following:

- (i) The Horsham District Planning Framework (HDPF), which was adopted in November 2015
- (ii) The Henfield Neighbourhood Plan (HNP), which was made by Horsham District Council in June 2021.
- (iii) West Sussex County Council Joint Minerals Local Plan (2018)
- (iv) The National Planning Policy Framework (NPPF) (As amended December 2024)
- (v) The application proposal must also be considered against national planning guidance where such guidance is material to the consideration of the application.

Horsham District Planning Framework (2015) (HDPF)

5.3 The HDPF was adopted by the Council in November 2015. This document provides the strategic planning policy framework for the District over the plan period 2011- 2031. The HDPF is now more than 5 years old, as such, the decision maker must consider the weight to its policies according to its consistency with the NPPF.

5.4 The HDPF identifies 6 priority themes for the Council, the first one of which is 'Economic Development: Plan for a successful local economy with high levels of employment.'

5.5 The following policies of the HDPF are considered to be relevant to the proposed scheme:

Policy 1 – Strategic Policy: Sustainable Development this policy states that the Council will take a positive approach to development which reflects the presumption in favour of sustainable development.

Policy 2 – Strategic Policy: Strategic Development. This policy sets out the Council’s strategic approach to development which generally encourages new development to take place within built up area boundaries in sustainable locations in accordance with the Settlement Hierarchy.

Policy 3 – Strategic Policy: Development Hierarchy sets out the characteristics and functions of settlements and sets out a settlement hierarchy on this basis. Henfield is listed as a Small Town / Larger Village, which is the second tier of settlement behind the main town of Horsham. The policy advises that these settlements have a good range of services and facilities, strong community networks and local employment provision together with reasonable rail and / or bus services. These settlements act as hubs for smaller villages to meet their daily needs, but also have some reliance on larger settlements / each other to meet some of their requirements.

Policy 4 – Strategic Policy: Settlement Expansion relates primarily to areas outside of built-up-areas and explains this land is considered to be in the countryside where development will be more strictly controlled. However, it also recognises that, in order to allow some communities to grow and thrive, and meet identified housing, employment and community needs it will be necessary for them to be able to expand beyond their current built form. It states that in these cases development can be brought forward by allocating sites in the Local Plan, or in Neighbourhood Plans.

Policy 7 - Strategic Policy: Economic Growth seeks to achieve sustainable economic growth for the District over the plan period. The policy sets out that one of the ways that this will be achieved is by encouraging sustainable local employment growth through Neighbourhood Development Plans

Policy 9: Employment Development seeks to protect valued employment and commercial sites to ensure that there are sufficient local employment opportunities to meet the needs of the District, it also seeks to ensure that there is flexibility in accommodating business needs and allows for the development of small businesses.

Policy 10: Rural Economic Development indicates that development which maintains the quality and character of the area and sustains the varied and productive economic activity will be supported in principle. However all development should be appropriate to the countryside location and in the case of an established rural industrial estate be within the existing boundaries of the estate.

Policy 24: Strategic Policy: Environmental Protection expects developments to minimise exposure to and the emissions of pollutants including noise, odour, air and light pollutions and ensure that they address land contamination by promoting the appropriate re-use of sites and requiring the delivery of appropriate remediation.

Policy 25: The Natural Environment and Landscape Character sets out that the natural environment and landscape character of the District will be protected against inappropriate development. Proposals that protect and enhance landscape character, maintain green infrastructure and enhance biodiversity will be supported.

Policy 26 - Strategic Policy: Countryside Protection seeks to protect those areas located outside of defined built-up-area boundaries from inappropriate development. It requires any proposal to be essential to its countryside location, and meet one of a set of criteria. One of those criterion is to enable the extraction of minerals or the disposal of waste. This policy expects proposals to be of an appropriate scale to its countryside character and location, and does not significantly increase the overall level of activity in the countryside.

Policy 31: Infrastructure and Biodiversity advises that development proposals are expected to contribute to the enhancement of existing biodiversity and should create and manage new habitats where appropriate.

Policy 32 - Strategic Policy: The Quality of New Development seeks to ensure high quality and inclusive design for all development in the district

Policy 33: Development Principles sets out principles against which to consider applications. This includes making efficient use of land, and prioritising the use of previously developed land and buildings, protecting local amenity and ensuring design is of a high standard.

Policy 35 - Strategic Policy: Climate Change seeks that proposals include measures which promote the conservation of water and/or grey water recycling, and mitigate the effects of climate change by reducing the amount of biodegradable waste sent to landfill.

Policy 36 – Strategic Policy: Appropriate Energy Use advises that development will be required to contribute to clean, efficient energy in Horsham based on the energy hierarchy of lean (use less energy through demand reduction), clean (supply of energy) and green (utilising renewable energy).

Policy 37: Sustainable Construction states that proposals must seek to improve the sustainability of development.

Policy 38 (Flooding) confirms that Priority will be given to development sites with the lowest risk of flooding. The development will be safe and flood risk will not be increased elsewhere.

Policy 40 (Sustainable Transport) states that to manage anticipated growth in demand for travel, development proposals that promote improved and integrated transport networks are encouraged. Development will be

supported if, amongst other criteria, it provides safe and suitable access for all vehicles, including pedestrians, and is located in an area where there is a choice of modes of transport available.

Policy 41: Parking this policy seeks to ensure that adequate and suitably located parking is provided to support new development.

West Sussex Joint Minerals Local Plan (JMLP) (2018)

- 5.6 The JMLP sets out the strategies for minerals planning including allocating strategic sites, and the protection of minerals production sites.
- 5.7 The application site is located within a Minerals Safeguarding Area for Brick Clay, it should be noted however that this is a wide designated safeguarding area as there is an abundance of Brick Clay (Weald formation) in the District. Given this designation, **Policy M9: Safeguarding Minerals** is relevant to the application. This policy seeks to safeguard resources against sterilisation, and requires applications to identify whether economically viable mineral resources are present on the site, and whether prior extraction is appropriate and practicable.

Henfield Neighbourhood Plan (HNP) 2021

- 5.8 Horsham District Council formally 'made' the HNP on 23rd June 2021.
- 5.9 The HNP allocates sites for residential and commercial development. Paragraph 5.37 of the HNP notes that Henfield Business Park has been a successful location for employment/commercial/industrial uses but is now at full capacity, as such the HNP seeks to create a new business area around Henfield Business Park by allocating neighbouring sites in the surrounding area for employment use.
- 5.10 Policy 3.1 (Employment Development Site Allocations) seeks to allocate three sites for employment use within the Plan area. The application site is formed of two of these allocated sites (known as Sites E & F in the HNP). The three allocated sites were been chosen in order to create a cohesive employment area around Henfield Business Park, and thereby allow this area to become a key sustainable employment site.
- 5.11 The HNP advocates the comprehensive development of the three allocated sites.
- 5.12 Paragraph 5.39 of the HNP advises that the three sites would benefit from working together to create a joint access which would be desirable for these three sites.

- 5.13 Policy 3.1.3 (Southgrounds (Site E)) allocates this northern part of the application site for employment use. The policy identifies a number of criteria that development on the site should meet:
- a. The design of the proposal has regard to its countryside location in respect of building scale.*
 - b. The design for the proposal demonstrates an understanding of the landscape character which contributes to the character of this part of the neighbourhood area and these inform the design and layout of the site.*
 - c. The proposal has regard for visibility from the surrounding countryside and provides for appropriate boundary treatments incorporating landscaping in particular provides screening on the western side.*
 - d. The proposal maintains and enhances as much as is practicable of the site's rural character, retaining existing field boundaries and tree belts where appropriate and enhancing with native species.*
 - e. The proposal makes provision for suitable access and appropriate associated infrastructure works to the A2037.*
 - f. The proposal has regard to the amenities of nearby residential properties.*
 - g. The proposal includes an adequate number and positions of electric vehicle charging points to enable businesses to choose to use electric vehicles. Henfield Neighbourhood Plan 2017-2031 41*
 - h. Any external lighting is designed to minimise light pollution and supports the dark skies policy of the South Downs National Park Authority.*
- 5.14 Policy 3.1.4 (Land north of the Old Brickworks (Site F)) allocates the application site for employment use. The policy identifies a number of considerations which should inform the masterplan and development of the Site, as follows:
- i. The design of the proposal has regard to its countryside location in respect of building scale.*
 - j. The design for the proposal demonstrates an understanding of the landscape character which contributes to the character of this part of the neighbourhood area and these inform the design and layout of the site.*
 - k. The proposal has regard for visibility from the surrounding countryside and provides for appropriate boundary treatments incorporating landscaping in particular provides screening on the western side.*
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- l. The proposal maintains and enhances as much as is practicable of the site's rural character, retaining existing field boundaries and tree belts where appropriate and enhancing with native species*
- m. The proposal makes provision for suitable access and appropriate associated infrastructure works to the A2037.*
- n. The proposal has regard to the amenities of nearby residential properties. Henfield Neighbourhood Plan 2017-2031 42*
- o. The proposal includes an adequate number and positions of electric vehicle charging points to enable businesses to choose to use electric vehicles.*
- p. Any external lighting is designed to minimise light pollution and supports the dark skies policy of the South Downs National Park Authority.*

National Planning Policy Framework (NPPF) (December 2024)

- 5.15 The NPPF sets out the national framework for plan making and decision making, it forms part of the development plan.
- 5.16 Section 2 sets out the purpose of the planning system as being the contribution to achieving sustainable development. This sets out that at a high-level, the objective of sustainable development is to meet the needs of the present, without compromising the ability of future generations to their needs. In achieving sustainable development, there are three, interdependent objectives: an economic objective; a social objective; and an environmental objective. Whilst these objectives should be used to guide development towards sustainable solutions, local circumstances should be considered to reflect the character, need and opportunities of each area.
- 5.17 Paragraph 11 of the NPPF states that that development proposals that accord with the development plan are to be approved without delay. It also requires that where policies are out of date, that the presumption in favour of sustainable development applies.
- 5.18 Paragraph 11 sets out the presumption in favour of sustainable development, or the 'tilted balance'. At part (d) it states:
 - d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular*

regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination. .

- 5.19 Section 6 (Building a strong, competitive economy) of the NPPF confirms that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Paragraph 88 refers to the rural economy and advises that planning decisions should enable the sustainable growth and expansion of all types of businesses in rural areas, both through conversion of existing buildings and well-designed, new buildings.

Other relevant planning policy

Emerging Policy: Horsham District Local Plan Review (HDLPR)

- 5.20 The review of the adopted Local Plan is at an advanced stage, the Council has submitted their Local Plan to the SoS in July 2024 and the Examination hearings commenced in December 2024. Following the initial Examination hearings the Inspector wrote to the Council to advise that he had serious concerns about the soundness of the Local Plan and recommended the remaining hearings were cancelled.
- 5.21 It is understood that a meeting will be held between the Inspector and the Council on the 26th February 2026 to explore the feasibility and practical arrangements of progressing the examination of the HDLPR.
- 5.22 Nonetheless, it is considered prudent to set out the relevant strategies and policies within the draft Local Plan Review document in relation to this site and the proposal. The Local Plan Review document continues to be based on a settlement hierarchy and seeks to continue directing development in and adjoining the most sustainable villages and towns of the District, including through the re-use of previously developed land.
- 5.23 The settlement hierarchy continues to classify Henfield as a small town / large village in the Local Plan Review document.
- 5.24 The Local Plan Review Document sets out a number of spatial objectives which will help the Local Plan to achieve its vision over the plan period. Spatial Objective 1 seeks to deliver a balance between economic, social and environmental priorities. Spatial Objective 7 seeks to meet employment needs and create opportunities to foster economic growth.
- 5.25 The Local Plan Review contains a Chapter on Economic Development and this sets out that 'A key objective of the Council's Economic Strategy is to make the District a first choice business destination.' This chapter also identifies a number of issues, one being that 40% of the working age

population commute outside the District to work, in order to reduce this figure there is a need to provide suitable high-quality space for businesses that want to locate in the District.

- 5.26 Whilst the Local Plan Review document indicates the proposed direction of travel that the Council are intending to take, it should be noted that the policies and strategy are not established and as such the policies therein should only be afforded limited weight in the decision-making process.

The Council Plan 2023-2027

- 5.27 The Council Plan sets out the focus for the Councils activities and priorities to the period 2027. This Plan sets out four key goals. The third is to 'build a thriving local economy', the plan seeks to ensure that the "District is known as an easy place to do business."

Government consultation document: Revisions to the NPPF (December 2025)

- 5.28 In December 2025 the Government consulted on their proposed reforms to the NPPF and other changes to the planning system. This consultation is scheduled to run until 10th March 2026.
- 5.29 Whilst this document does not yet form planning policy it does indicate the direction of travel and priorities of the Government, and as such it is considered prudent to set out the policies and parts which are thought to be relevant to this scheme.
- 5.30 Chapter 7 of this document confirms that economic growth is the number one mission of this government.
- 5.31 Policy E2: Meeting the need for business land and premises is a proposed new policy which seeks to provide clarity on the relevant planning considerations for business development proposals, it proposes that substantial weight should be given by the decision-maker to the economic benefits of proposals for commercial development.

6. Scheme Appraisal

6.1 This section provides an assessment of the proposals against the relevant Development Plan policies. It will demonstrate that the proposals wholly accord with the Development Plan and the presumption in favour of sustainable development.

6.2 It is considered that the main material considerations in the determination of this planning application are:

- The principle of the proposed development;
- Transport, access and parking;
- Landscape Impact;
- Design & Layout;
- Impact on neighbouring amenity, including Air Quality and Noise;
- Flooding & Drainage;
- Minerals;
- Ecology & Biodiversity and,
- Arboriculture;

Principle of the proposed development

6.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) states *'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise'*.

6.4 Development should therefore be determined in accordance with the Local Plan unless material considerations indicate otherwise.

6.5 Currently for the purposes of Section 38(6) of the PCPA 2004, the current development plan for the area in which the application site is located comprises of the Horsham District Planning Framework (2015) (HDPF) and the Henfield Neighbourhood Plan (2021) (HNP).

- 6.6 The application site is allocated for employment development within the HNP under Policies 3.1.3 (Southgrounds (Site E)) and 3.1.4 (Land north of the Old Brickworks (Site F)).

Horsham District Planning Framework (2017) (HDPF)

- 6.7 Policies 3 & 4 (Development Hierarchy & Settlement Expansion) establishes the District's settlement hierarchy and seeks to prioritise development within built-up-area boundaries and the more sustainable settlements, but recognises that settlements need to develop in order for them to continue to grow and thrive. The policies ensure that the mechanism by which this will be achieved is through the designation of built-up area boundaries and the planned expansion of existing settlements through the Local Plan or Neighbourhood Planning.

- 6.8 The application Site is located outside of any designated built-up-area boundary however it is sited on land which is designated for employment use in the Henfield Neighbourhood Plan. As such, the principle of employment development on the site is considered to accord with the strategic policies 3 & 4 of the HDPF.

Henfield Neighbourhood Plan (2021) (HNP)

- 6.9 The application site is formed of 2 adjoining sites which have both been allocated for employment development within the HNP. The HNP advocates for the comprehensive development of the allocated employment sites.
- 6.10 Policies 3.1.3. (Southgrounds (Site E)) and 3.1.4 (Land north of the Old Brickworks (Site F)) allocate the 2 parts of the application site for employment use. These policies set out a number of criterion which should inform the development of this site.
- 6.11 The subsequent sections will detail how the proposal has demonstrated to accord with the criterion of this policy.
- 6.12 The principle of employment development on the site accords with Policies 3.1.3 & 3.1.4 of the HNP.

National Planning Policy Framework (2024)

- 6.13 Paragraph 11 of the NPPF states that decisions should apply a presumption in favour of sustainable development and that development proposals that accord with the development plan are to be approved without delay.
- 6.14 Given the allocation of the Site within the HNP for employment use, and the support for such allocations by Neighbourhood Plans in Policies 3 & 4 of the HDPF, there can be no objection in principle to the development of this site

for and in accordance with paragraph 11 of the NPPF, the Council must therefore apply the presumption in favour of sustainable development.

Transport, Access and Parking

- 6.15 An assessment of the existing transport infrastructure, highway network and public transport provision in the vicinity of the Site, has been undertaken and submitted in support of this application and demonstrates the quantum of development proposed can be delivered.
- 6.16 The proposed access into the Site would measure 6m in width, the access design is of sufficient width to enable the two-way movement of vehicles in line with the Manual for Streets guidance.
- 6.17 The Transport Assessment confirms that modelling of the site access junction with Shoreham Road and the A2037/A281 mini roundabout to the north during weekday peak hours demonstrates that the proposed development will not have a material impact on the operation of these junctions and, on this basis, it is considered that the proposals will not interfere with the operation of the adjoining highway network in terms of capacity.
- 6.18 The Transport Assessment advises that the development proposals will result in an increase in vehicle trips on the wider highway network, with circa 48 vehicle movements during the weekday peak AM period, and 41 vehicle movements during the peak weekday PM period. The traffic modelling included within the accompanying Transport Assessment report demonstrate that the impact of development generated traffic on the operation of the highway network is not significant (safety or capacity) and there is no need to provide capacity improvements.
- 6.19 In terms of movements by HGVs, the assessment has estimated that the proposed development could result in up to approximately 3 movements by such vehicles in the weekday morning and afternoon peak hours and around 37 HGV movements across a typical weekday. This assessment is very much a worst case scenario, because with the size of units proposed it is in reality very unlikely to generate HGV vehicles, but rather smaller lorries and vans.
- 6.20 The development proposals will generate movements by LGVs and HGVs. As such, to assess the adequacy of the internal site layout relating to each aspect of the proposed development, swept path analysis has been prepared to demonstrate vehicular movements associated with the site and is included in Appendix E.
- 6.21 It is anticipated that the largest vehicle that will require access to the site is a 16.5 metre articulated vehicle. The unit yard depths are deep enough to accommodate HGVs, but the general intention is that such vehicles would

turn and stand on the internal road to service units. It is further anticipated that the majority of vehicles accessing units of this size will be vans/LGVs.

- 6.22 The accompanying Transport Assessment provides further details and plans providing swept path analysis of the vehicles accessing the site and the loading bays.

Parking

- 6.23 On site parking provision (including electric vehicle charging) will be provided. The site layout plan indicates a total of 103 car parking spaces, which includes 12 spaces for disabled persons (12%) and 41 bays with active provision for electric vehicle charging (39%). The plan also indicates a communal, secure sheltered cycle store to accommodate 52 bicycles in the form of two-tier racks.
- 6.24 Each unit will benefit from a disabled parking space and at least two bays compatible with electric vehicle charging, in addition to a loading bay and two cycle parking spaces in the form of a Sheffield-type stand close to their respective entrances.
- 6.25 In addition to the above, an additional seven standard parallel parking spaces are provided in the form of lay-bys within the development. Additional space is also available within the layout for larger delivery vehicles to park on the internal roads without obstructing the road or turning areas.
- 6.26 The Site benefits from very close proximity to existing bus stops, which are located directly outside of the site and on the opposite side of Shoreham Road at Henfield Business Park. The bus services at these stops provide regular services to Henfield, Worthing, Horsham, Pulborough and Burgess Hill and stops between.
- 6.27 It is therefore considered that this Site benefits from good public transportation links, and a range of services and facilities are able to be accessed via bus.
- 6.28 As such the Site is considered to be in a sustainable location, and development on the Site provides opportunities for travel by modes of transport other than the private car. The scheme will therefore meet the aims of the NPPF by locating new development where sustainable modes of transport can be utilised. Furthermore, the allocation of the site in the Henfield Neighbourhood Plan demonstrates that the Council consider the site to be an eminently suitable and sustainable location for development.
- 6.29 A Framework Travel Plan is submitted as part of the application, which outlines measures to support and encourage more active and sustainable travel among future occupiers.

- 6.30 Policy 40 of the HDPF states that development will be permitted where it provides safe and suitable means of access, and is located in an area where there is a choice of modes of transport available.
- 6.31 The Transport Assessment demonstrates that the traffic impact of the scheme will not be severe, access to the site can be achieved which is safe and of a suitable width, and the proposal will create links between new development and existing pedestrian, and public transport networks, and as such, there are opportunities for sustainable travel modes to be utilised around the site. The proposal is therefore considered to be in accordance with policy 40 of the HDPF, and policies 3.1.3 & 3.1.4 of the HNP.

Landscape Impact

- 6.32 The Site is not situated within any protected landscape designations.
- 6.33 The application submission is supported by a Landscape and Visual Impact Assessment (LVIA) which provides both a landscape and visual appraisal of the Site and its surroundings, and the potential impacts of the proposed development of the Site.
- 6.34 The LVIA confirms that the Site itself does not fall within a statutory designated landscape. However, the site is thought to be within the setting of the South Downs National Park (SDNP). The LVIA has assessed the proposal in terms of its potential impact on the SDNP and has concluded that within the long distance views from the SDNP the proposed built form and rooflines would be heavily filtered by intervening vegetation and be barely perceptible, and as such would have a negligible effect on visual amenity.
- 6.35 The LVIA advises that there is considered to be an overall Minor-Moderate adverse effect on local landscape character from the proposed scheme.
- 6.36 The main impact on visual amenity as a result of the proposal is considered to be primarily on vehicle users of Shoreham Road. The LVIA concludes that this would be a Minor adverse effect on visual amenity along Shoreham Road, however, this is limited by the presence of existing commercial and industrial built form in the vicinity, with the Henfield Business Park and the Old Kennels, and with which a cohesive relationship would result.
- 6.37 The proposal is therefore considered to be considerate and in keeping with the general industrial / commercial character of the area.
- 6.38 The site layout plan and supporting application documents demonstrate how the Site can accommodate the proposed level of development as well as retaining the majority of the trees and hedgerows along the Site boundaries as part of the landscape scheme.

- 6.39 The proposal is therefore considered to comply with the requirements of policies 10, 25, 32 & 33 of the HDPF, and criterion a,b & c of policies 3.1.3 & 3.1.4 of the HNP.

Design & Layout

- 6.40 Policy 33 of the HDPF seeks to ensure that the scale, massing and appearance of the development is of a high standard of design, relate sympathetically to its surroundings, and are locally distinctive in character respecting the character of the surrounding area. Policy 12 of the Henfield Neighbourhood Plan states that development proposals should be of a high-quality design and reflect the architectural and historic character and scale of the surrounding buildings and landscape. Criteria a of Policies 3.1.3 & 3.1.4 require that the design of the proposal on site has regard to its countryside location in respect of building scale.
- 6.41 The layout approach of the Site is very much landscape-led based on the existing landscape character and features of the Site, and seeks to respect these features including the existing central east-west tree and hedgerow belt which splits the site in two parts. The proposed layout respects and responds to the character of the Site and ensures that the majority of the existing trees and vegetation along the boundaries and within the site can be retained, it also responds to constraints and opportunities which have been identified through the site assessment process. The accompanying Design and Access Statement (PRC), provides commentary on how the Concept Masterplan responds to the site constraints and opportunities and how this is reflected in the site layout.
- 6.42 In terms of the proposed layout, the scheme proposes an inward-looking development, thereby keeping activity to the centre of the development.
- 6.43 The Site would utilise the existing access road from the A2037 established by the neighbouring employment site to the south and would link to this site via a central spine road entering the application site. The utilisation of the existing access road and proposed shared access is in accordance with the criteria set out in the HNP. The proposed access is therefore considered to comply with Policy 3.1 and supporting text in the HNP.
- 6.44 The existing vehicular access onto Shoreham Road from the site will be closed, but will be reconfigured in order to allow pedestrian and cycle access to the site, which will allow easy access to the existing bus stops and pedestrian crossing immediately adjoining the site.
- 6.45 Each unit is provided with a car parking area and service yard facility. It is anticipated that due to the modest size of the proposed units, most commercial vehicles serving the site will be vans and smaller goods vehicles, however, space has been allowed on all forecourts for the turning and standing of HGVs.

6.46 The western part of the site would be kept free of development and instead it is proposed to be utilised for BNG and ecological enhancement purposes. Based on the proposed plans the proposals on site will achieve a 12.02% net gain in hedgerow units and a 6.23% net gain in habitat units. In order to satisfy the 10% requirement for habitat units, the application proposes the purchase of credits from an offsite provider such as the Environment Bank upon approval of the planning application.

6.47 The proposal is therefore considered to comply with policies 32 and 33 of the HDPF, policy 12 of the HNP, and the relevant criterion listed in policies 3.1.3 & 3.1.4 of the HNP

Flooding and Drainage

6.48 The application is supported by a Flood Risk Assessment & Drainage report (HOP). The FRA identifies that the Site is located within Flood Zone 1.

6.49 Flood risk and drainage input has been provided from an early stage of design, and this input has informed the design of the scheme, which has ensured that the siting of the development has followed the sequential approach in that all built development will be located within Flood Zone 1.

6.50 The FRA identifies that the Site is wholly located within Flood Zone 1 and is therefore a low risk of flooding. All forms of development are considered acceptable in principle in Flood Zone 1. The Sequential Test is not required as the developable area of the Site is located within Flood Zone 1.

6.51 The FRA confirms that the site is at a negligible or low risk of surface water flooding. There are isolated areas of low-risk flood areas within the eastern part of the site, surface water flood risk on this part of the site is to be mitigated by the inclusion of a new SuDS attenuation system.

6.52 The FRA and Drainage Strategy (HOP) is submitted in support of this application and contains further information on the proposed drainage strategy and attenuated SUDS system for the site.

Foul Water Drainage

6.53 In terms of drainage, the proposed foul water disposal is to be via a package foul water treatment plan located to the west of the main built area of the site. An outfall is proposed to connect to the existing flowing stream in the ditch on the southern boundary of the site. The proposed foul water drainage strategy is as per the existing arrangement for neighbouring sites along Shoreham Road.

Surface Water Drainage

- 6.54 The ground conditions of the site are not considered to be favourable to a SuDS based on infiltration techniques, as such an attenuated SuDS scheme is proposed with a controlled discharge of surface water runoff to the adjacent watercourse network. The accompanying FRA & Drainage Strategy report (HOP) confirms that the post-development runoff rate is maintained at a rate providing an overall betterment in terms of flood risk to the downstream watercourse.
- 6.55 The Drainage Strategy confirms that all drainage features have been designed to accommodate the runoff from all storms up to and including the 1 in 100-year storm with a 40% allowance for climate change.

Minerals

- 6.56 The application site is situated within a defined Mineral Safeguarding Area' as set out in the West Sussex Joint Minerals Local Plan (JMLP).
- 6.57 The application site is located within a Minerals Safeguarding Area for Brick Clay, it should be noted however that this designated safeguarding area is vast and covers a large area of the District as there is an abundance of Brick Clay (Weald formation) in the District.
- 6.58 Given this designation, **Policy M9: Safeguarding Minerals** is relevant to the application. This policy seeks to safeguard resources against sterilisation and requires applications to provide a Minerals Assessment to identify whether economically viable mineral resources are present on the site, and whether prior extraction is appropriate and practicable.
- 6.59 The application is supported by a Minerals Assessment (Cuesta) which confirms that it would not be appropriate to undertake prior extraction of Weald Clay from the site, and that such extraction would be neither practicable nor environmentally feasible.
- 6.60 The information contained within the Minerals Assessment provides further details, but to summarise, due to the likely considerable depth of the mineral resource beneath the site, the small-scale nature of the site when compared to the commercial clay pits in the area would mean that on a small site such as the application site, the maximum depth of working would be severely limited. Furthermore, clay pits require shallow slope angles with significant stand-off distances from existing buildings and roads to guard against slope failure, the site is in proximity of existing buildings and infrastructure and due to the small-scale nature of the site shallow slopes would not be a feasible.
- 6.61 As such, the proposal is considered to be exempt from policy M9 of the JMLP.

Ecology & Biodiversity Net Gain

- 6.62 The application is supported by an Ecological Impact Assessment (EclA) (Ecology Partnership). A number of surveys and site walkovers were undertaken between November 2023 – October 2024 in order to ascertain the general ecological value of the land and to identify the main habitats on site. The proposals have been informed by the ecological conditions of the Site.
- 6.63 The EclA identified the baseline ecological conditions of the Site. This confirmed that the majority of the Site is dominated by pasture grassland, surrounded by grown out and unmanaged hedgerows, which have formed mixed scrub with some mature trees across the north-south field divide and within scrub boundaries. The EclA notes that no habitats on site were considered to meet the criteria for priority habitat, however, the ecologically valuable lines at the field perimeters were deemed to have significant value as green corridors. Further information on the baseline ecological conditions of the Site can be found in the accompanying EclA.
- 6.64 The Site falls within the Special Protection Area (SPA) and Special Area of Conservation (SAC) of the North Sussex Water Resource Zone for the Arun Valley Ramsar.

Species

- 6.65 The Desktop Study undertaken to support the EclA noted that there were species records for common reptile species, Great Crested Newts, badgers, reptiles, hedgehogs, dormouse and bats within 2km of the Site. As such further surveys in relation to these species were undertaken, these survey reports have been submitted in support of the planning application but are summarised below.

Reptiles

- 6.66 The Site provides some boundary scrub comprising of bramble, tall ruderal or hedgerows which was considered to be suitable habitat for reptiles. A total of 7no. Reptile surveys were undertaken between May and July 2024 in order to assess the presence / likely absence on site.
- 6.67 The result of the surveys found evidence of only one species of reptile (slow worms) was found on site, and the surveys found that the site supported a low slow worm population, which is considered to be of no more than 'Site' value.
- 6.68 The retention of the majority of the hedgerows along the boundary together with the creation of new areas of species-rich grassland within the western part of the site, the creation of new attenuation features and the planting of

new native trees/hedges/scrub would provide new and enhanced opportunities for a range of invertebrates including slow worms on the site.

Great Crested Newts (GCN)

- 6.69 There are no ponds within the Site itself, but there are 2 ponds located some 270-280m of the proposed works area on the site, and these ponds tested positive for the presence of GCN.
- 6.70 The development site itself is considered to have terrestrial habitat that is limited in suitability with short-sward grazed grassland dominating this part of the site, no refugia of note or clear commuting pathways across the site, this together with the lack of ponds on site means that it is unlikely that GCN are present on site, however, low numbers of individuals in the edge habitats cannot be discounted. If present, these would be of 'Site' value.
- 6.71 The proposal comprises development on the eastern part of the site with the westernmost fields being retained for ecological enhancement and BNG purposes. The surrounding off-site terrestrial habitats are considered to be of much higher value for GCN, the woodland and scrub which border the 2 ponds are known to offer much high habitat value to GCN.
- 6.72 Given the distance from those ponds which tested positive for GCN, the higher value GCN habitat being present off-site and nearer those ponds, and the retention of significant greenspace on the site, no further survey work or licencing is deemed necessary.
- 6.73 Furthermore, the creation of attenuation features, native scrub, wildflower grassland and log piles will provide new and enhanced habitat for Great Crested Newts and can be provided on the western part of the site.

Bats

- 6.74 The vegetation around the boundaries of the site are considered to provide suitable foraging opportunities and commuting links for bats, but the grassland on site is considered to offer minor value for foraging. The site was considered to be of a low habitat suitability for foraging and commuting bats.
- 6.75 Bat activity surveys were undertaken during April, May, June July, August, September and October 2024. Overall, the majority of the activity recorded from the surveys was from the Soprano Pipistrelle followed by the Common Pipistrelle.
- 6.76 Overall, the bat assemblage utilising the site for foraging and/or commuting was assessed to be of 'Site' value only.
- 6.77 A tree inspection took place as part of the PEA in November 2023, two trees were identified as potential roost trees, however, further inspection during

the bat emergence surveys in July, August and September 2024 found that these trees contained no signs of roosting bat activity, and this confirmed that roosting bats were likely absent from the trees to be impacted by the development.

- 6.78 One of the potential roost trees is to be retained and pollarded, the other is to be removed to accommodate the development. However, the loss of the tree can be adequately compensated with two replacement bat boxes installed in suitable locations on site.
- 6.79 A sensitive lighting scheme has been proposed throughout the development and will ensure the existing commuting and foraging flight paths are protected from negative impacts.
- 6.80 The vast majority of the hedgerow network and trees along the boundaries of the site are to be retained within the proposed development. The retention of the vast majority of hedgerows and tree lines, and the recommended new areas of species-rich grassland and native shrub planting would provide new and enhanced foraging and navigational opportunities for bats. The inclusion of bat boxes within the site will provide new roosting opportunities for bats.

Badgers

- 6.81 A badger survey was undertaken on site. No evidence of badgers (such as setts, latrines, snuffle holes or footprints) were identified within the site on the day of the survey.
- 6.82 The habitat on site is considered to be suitable for foraging and as such it is possible that the site could occasionally be utilised by badgers for foraging and commuting, however, the EclA notes that significant potential impacts are unlikely.

Dormouse

- 6.83 Dormouse surveys were undertaken on the site between May and October 2024 and these did not record the presence of any dormouse on site.
- 6.84 There are no records of dormouse within 2km of the site boundary, given this and the survey results on site, it is considered that dormice are likely to be absent from the site.

Breeding birds

- 6.85 The EclA notes that nesting birds are likely to be using the scrub and trees on site, however, due to the scale of the site and lack of any high value habitats or features within the site, it is thought that any breeding bird assemblage on site is of 'Site' level value only.

Hedgehogs

- 6.86 The scrub located along the site boundaries of the site are considered to be suitable to support hedgehogs. However, due to size of the site any hedgehog population on site is likely to be of importance up to 'Site' level only.

Ecology Enhancement and Mitigation and Biodiversity Net Gain

- 6.87 The Indicative Proposals are capable of delivering significant ecological enhancement.
- 6.88 The layout has been developed with the biodiversity of the Site as a key consideration and has been designed to minimise the potential for any negative impacts from habitat fragmentation. The existing hedgerows along the boundaries of the Site are to largely remain and supplementary planting is also proposed along the boundaries.
- 6.89 Other enhancements proposed include the provision of additional bat boxes on trees and buildings; a landscaping strategy which includes additional SUDS attenuation. New areas of species-rich grassland are proposed along with the creation of new attenuation features, and the planting of new native trees/hedges/scrub which will provide new and enhanced opportunities for a range of invertebrates. Mitigation and enhancement measures have been proposed and these have been incorporated into the proposal in order to offset the impact of the development.
- 6.90 A BNG assessment using the Statutory Metric has been undertaken by The Ecology Partnership, the report of which accompanies this planning application. The BNG assessment advises that the habitats currently on site have a value of 15.95 units and hedgerow values of 7.44 units comprising modified grassland, other neutral grassland, scrub and ecologically valuable tree lines.
- 6.91 The proposals for BNG on the development site include new wildflower grassland and mixed native shrub planting around the new business park area, with smaller verges to comprise flowering lawn. An outline Habitat Management and Maintenance Plan (HMMP) has been produced by the Ecology Partnership and is submitted in support of this application.
- 6.92 The proposals on the western part of the site comprise a new SUDS attenuation basin which will be designed to hold water and function as a pond, whilst the remainder of the grassland on this part of the site will be enhance through scarifying and seeding of species-rich wildflower mix. In addition, the thick scrub on the site will be enhance resulting in a more diverse structure, and native trees will be planted throughout the entire site.

- 6.93 Overall the proposals for the site will achieve a 6.23% (0.99 unit) biodiversity net-gain in habitat units with a total unit deficit of -0.6 units from the 10% BNG target. In order to reach the 10% target an additional 0.49 units of medium distinctiveness 'Grassland' habitat, and 0.11 units of any habitat type is required.
- 6.94 The proposals for the site will achieve a 12.02% (0.89 unit) biodiversity net gain in hedgerow units.
- 6.95 The deficit in BNG will be offset through the purchase of credits from an offsite provider such as the Environment Bank once the application has been approved and detailed landscape design finalised.
- 6.96 The proposal comprises of a combination of onsite and offsite measures in order to meet the required 10% target of the Environment Act 2021, and is therefore considered to be in compliance with the Act and the guidance and requirements set out in policies 25 & 31 of the HDPF.

Arboriculture

- 6.97 There are no Tree Protection Orders (TPO) on any of the existing trees on the Site. Arboricultural input has been provided from an early stage of design, and the design of the development proposals have been informed by this input. The majority of trees and hedgerows along the field boundaries will be retained through the development proposals where possible.
- 6.98 An Arboricultural Impact Assessment (AIA) has been undertaken by Broad Oak Trees and is submitted in support of the application. The AIA advises that a total of 79 individual trees, groups and hedges were inspected on the site, and these ranged from young self-seeded Blackthorns to mature Oaks. The trees on site represented typical field boundary components with Oak being the dominant species.
- 6.99 The AIA notes that some tree removal on site is unavoidable, however, the removals have, by design, been focussed upon lower quality elements of the tree stock.
- 6.100 The proposed development of the site would require the removal of 5no. trees, 7no. groups and 1no. part of group, all but two (T3 & T29) are BS category, C or U, and as such should not represent a constraint to the proposals, according to BS5837:2012.
- 6.101 A replacement hedge and feature trees are proposed for the loss of the hedge G1 and trees T2, T3 and T4, with additional planting achievable on the land to the west and supplemental planting within the development part of the site.

Impact on retained trees

- 6.102 The proposed layout has been designed with the benefit of tree constraints information to allow for trees to be retained within and surrounding the proposals, with minimal conflicts, to provide a mature setting to the development.
- 6.103 Retaining walls are proposed on the site in order to avoid impacting the RPAs of the adjoining category B trees, the retaining walls avoid the needs for banking which would have a considerable impact on the RPA of these trees to achieve required slopes.
- 6.104 Building positioning and primary road infrastructure has avoided tree canopies and RPAs, where practical. However, the new access road will impact on the RPA of the Oak T69 (BS category B), which is unavoidable to match the new access road with the existing road alignment to the south. To minimise any impacts the excavation edge nearest the tree will be hand tool excavated to avoid potential root tearing associated with machinery excavation. Any roots encountered will be neatly cut back to the excavation face to minimise wound size. This approach would accord with the recommendations in Section 7.2 "Avoiding physical damage to roots during demolition or construction" of BS5837:2012. These measures to minimise any impacts from footpath installation are indicated on the Tree Protection Plan.
- 6.105 The AIA concludes that overall, provided the trees are appropriately protected during the works, the arboricultural impact of the proposals on retained trees will be minimal.

Impact on Neighbouring Amenity

- 6.106 The siting and orientation of the proposed industrial / commercial units on the Site has been carefully considered to minimise the impact on neighbouring amenity as a result of good separation distances, scale and a layout that takes account of the position of surrounding existing dwellings.
- 6.107 The proposal includes the retention of the existing trees and scrub along the boundary which will help to screen and filter views of the proposed buildings, and would ensure they are well contained in the landscape and would be only seen in limited views from outside of the Site.
- 6.108 A great deal of consideration has been given to the proposed site layout and the position of the fenestration and openings on the proposed buildings in order to respect the existing residential amenity of the properties to the north of the site. The layout is such that the proposed structures nearest the neighbouring properties have been sited away from the boundaries and have been reduced in scale and with a reduced eaves height of 5m thereby preventing any potential for the proposed buildings to be overly dominant or overbearing to the occupiers of the neighbouring properties.

- 6.109 Additional trees are proposed along the northern boundary of the site and the existing mixed scrub is to be enhanced with new native shrub planting, it is considered that the as a result of this enhance planting the proposed buildings would be well screened and would not adversely impact upon the residential amenity of the neighbouring dwellings.

Air Quality

- 6.110 An Air Quality Assessment (RWDI) has been undertaken by and is submitted in support of this application.
- 6.111 This report advises that the baseline assessment indicates that NO² PM10 and PM2.5 AQOs are currently being met in the area around the development site and are expected to continue to be met.
- 6.112 The report acknowledges that construction activities with the proposed development could generate dust, however mitigation measures are proposed and these appropriate mitigation measures and best practice will ensure that impacts are minimised. The current proposal at the development includes the provision of 35 electric vehicle charging points, the usage of ASHP for means of heating and hot water, and bicycle parking facilities consisting of 52 sheltered storage spaces. The report advises that based on this information, no further mitigation measures are required.
- 6.113 The report also confirms that there will be no impacts on local air quality from on-site energy plant as air source heat pumps are proposed for heating and hot water provisions across the site during the operational phase.
- 6.114 The proposed development is considered to comply with relevant national, regional and local planning policy (Policy --- of the HDPF) and air quality does not present a constraint to the development proposals.

Noise

- 6.115 A Noise Assessment has been undertaken by RWDI and is submitted in support of this application.
- 6.116 The Noise Assessment has established the existing prevailing noise conditions around the site, and this has highlighted that the prevailing noise is comprised of the existing road traffic on the A2037 and the operational noise from the existing neighbouring industrial estate, commercial buildings and builders yard.
- 6.117 This report confirms that in light of the effect of road traffic noise change due to the operation of the proposed development there is no calculated impact on the residential amenities of the surrounding residential properties.

Community Infrastructure Levy (CIL)

- 6.118 The Councils CIL charging schedule was adopted in April 2017. The Council's CIL charging schedule and the relevant page of the Council's website advises that applications which propose residential development or 'Large Format' Retail are CIL liable, and that sites which propose B, C1, C2 & D uses (B uses are now amended to E (including E(g))) are subject to a 'Standard Charge' which is currently set at £0/m² for 2026.
- 6.119 The application proposes use classes B2, B8 & E(g) on site and based on the information contained in the Councils CIL Charging Schedule it is not considered that the development will be CIL liable.

7. Statement of Community Involvement – Public Consultation

- 7.1 The application Site is formed of 2no. parcels of land which have been allocated in the Henfield Neighbourhood Plan for employment use. A referendum on the HNP was held on the 6th May 2021 and the plan received a 90.5% yes vote from residents. As part of the Neighbourhood Plan process and the allocation of the sites, the Parish and Neighbourhood Plan Steering Group undertook a great deal of public notification and consultation on the contents of the HNP and the proposed site allocations.
- 7.2 As a result it was not considered necessary to undertake any further public consultation events regarding the proposal to develop these sites for employment use. However, prior to the submission of the application, the applicant sent a copy of the proposed masterplan with a letter detailing the proposal to all the immediately adjacent residential and commercial properties. The applicant invited comments or queries from the occupiers of these neighbouring properties.
- 7.3 The applicant also sent a copy of the proposed masterplan and a letter detailing the intended development to the Parish Council and invited the Parish to meet in person with the applicant's planning consultant should they consider it necessary.

8. Conclusions

- 8.1 This Planning Application wholly accords with the allocation of the Sites as set out in Policies 3.1, 3.1.3 & 3.1.4 of the Henfield Neighbourhood Plan. The Site is considered to be a logical location for employment uses and a logical extension to the other neighbouring employment use sites. Despite being outside of the built-up-area boundary it is considered to be in a sustainable location given its very close proximity public bus links, and the suitability of the nearby roads for cycling to and from the site. The principle of development on the Site has been accepted by the allocation in the HNP the proposals are considered to comply fully with the policy criterion.
- 8.2 The proposal makes best use of land, within the area defined for employment development in the Henfield Neighbourhood Plan.
- 8.3 It has been demonstrated that there are no constraints to development of the Site and the proposal would result in a scheme that is eminently suitable within the surrounding commercial / industrial area, and would make a significant contribution towards meeting employment needs in Henfield, but also the wider southern part of the District. The proposal will therefore help to improve the employment land supply within the District.
- 8.4 The scheme could deliver the required 10% Biodiversity Net Gain, with the proposed illustrative layout demonstrating a **6.23%** increase in Biodiversity Net Gain. The proposal comprises of a combination of onsite and offsite measures in order to meet the required 10% target of the Environment Act 2021, and is therefore considered to be in compliance with the Act and the guidance and requirements set out in policies 25 & 31 of the HDPF.
- 8.5 The Site is not located within a site of Special Scientific Interest; an Area of Outstanding Natural Beauty, Conservation Area or National Park. Nor does it have any impact on designated heritage assets.
- 8.6 The application is supported by a comprehensive suite of technical documents and reports. These demonstrate that the development of the Site would not have any unacceptable or adverse environmental impacts, which indicate that development should be restricted. Where deemed necessary and appropriate, planning conditions can be applied to ensure that suggested mitigation measures are secured.
- 8.7 It is demonstrated throughout the supporting documents, including the Design and Access Statement, that the level of development proposed is both acceptable in technical terms and also maximises the potential of the Site in accordance with the NPPF.
- 8.8 As demonstrated within this Planning Statement, the proposal fully accords with the Site allocation policies and other relevant policies of the Henfield

Neighbourhood Plan and the relevant policies within the Horsham District Planning Framework, and the NPPF.

- 8.9 In accordance with paragraph 11 of the NPPF 2024, as the proposals fully accord with the development plan, planning permission should be granted without delay. We, therefore, respectfully request that the application be approved.