

Broomers Hill Industrial Estate

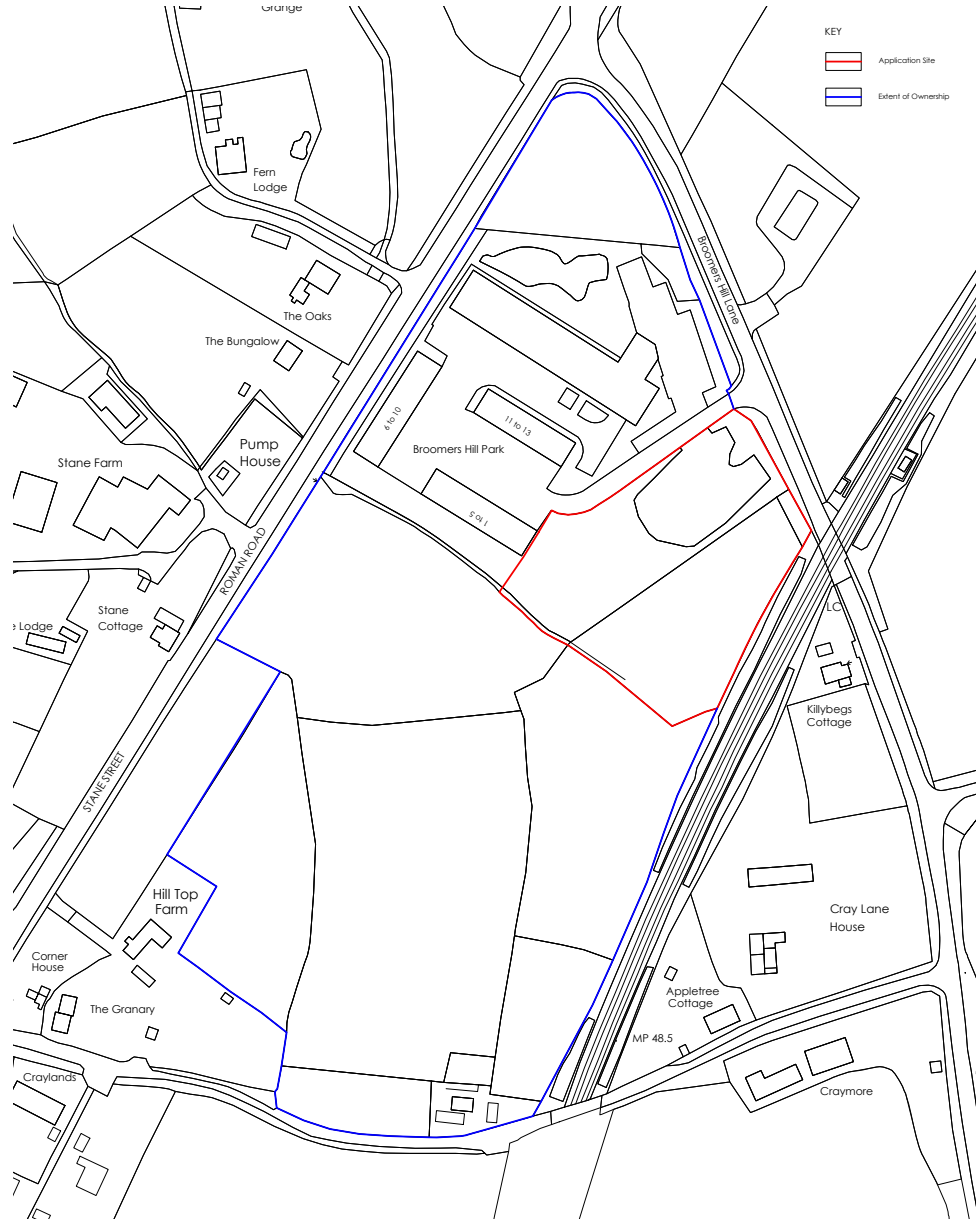
Phase 2 - s73 application

Design and Access Statement

Prepared by LRM Planning Limited on behalf of WT Lamb Holdings Ltd

June 2026





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Figure 1 - View of the site from the north

1

Introduction

1.1 This Design and Access Statement (DAS) accompanies a s73 application submitted on behalf of Wt Lamb Holdings Ltd, the applicant, for variations to conditions approved by planning permission DC/13/1048.

1.2 The proposals seeks to change the approach to the development of Part B of the consented area from 2 seperate buildings containing 10 units, into 1 building with 10 units. The proposal also includes car parking, landscaping, sustainable drainage and associated works.

1.3 The DAS and accompanying documentation justify how the proposed development aims to make use of this site. All pertinent technical considerations have been undertaken in order to feed into the proposed changes.

Purpose

1.4 The DAS sets out and justifies the design rationale for the proposals. It has been prepared in accordance with the following documents:

- National Design Guide (MoH CLG, 2019)
- National Planning Policy Framework (MoH CLG, 2019)
- Guidance on Information Requirements and Validation (CLG, 2012)
- Development Management Procedure Order (DMPO, 2015)
- Streamlining the Planning Application Process: Consultation (CLG, 2013)
- Planning Practice Guidance (2014)
- Horsham Local Plan

1.5 The DAS forms part of a comprehensive package of information submitted with the s73 application. It will explain the proposals in a concise and structured way to ensure that those assessing the application will understand the rationale that underpins it.

Aim

1.6 The aim of this document is to:

- provide an overview of the site context, which has aided in shaping the proposals;
- demonstrate the steps taken to appraise the context of the development and how the design of the development takes that context into account;
- explain the design principles and concepts that have been applied to the development; and
- explain how specific issues which might affect access to the development have been addressed.

Figure 2 - View of the site from the south



Figure 3 - Entrance to the site



Figure 4 - Existing business units

2

Site description and context analysis

Location

- 2.1 The site is located alongside the existing Broomers Hill Industrial Estate at Codmore Hill. It is currently used as an overflow car park and benefits from an extant planning permission for employment uses.

Features

- 2.2 The site is broadly rectangular and relatively level. It lies within the settlement boundary.
- 2.3 It comprises of an area of overspill car parking and cleared area. A part of the approved access has been implemented.

Boundaries

- 2.4 The site's boundaries summarily comprise:
- North – the existing Broomers Hill Lane and agricultural land beyond;

- East – the Bognor Regis to London Victoria line forms the eastern boundary;
- South – land allocated for further employment development (phase 3); and
- West - the existing Broomers Hill Industrial Estate (phase 1).

Wider Context

- 2.5 This section sets out an analysis of the site's immediate and wider physical context. This will provide an understanding of the issues affecting the site.

Surrounding Land Uses and Urban Form

- 2.6 To the west of the site, beyond the adjoining Industrial Estate is sporadic development which includes residential properties of varying sizes and styles, farm buildings and land and a scrap yard.
- 2.7 To the south lies Codmore Hill which

predominantly comprises residential properties (including a relatively recent housing estate) and facilities including several bus stops, equestrian activities, the Sainsbury's supermarket, restaurant, car showroom and other facilities.

- 2.8 The local built environment is made up of a wide variety of styles of building and land use. Indeed, this ranges from traditional local vernacular style cottages to modern housing estates and commercial enterprises.

- 2.9 The Parish Council's Design Guide (2013) helpfully sets this context into a number of key character areas. Summarily for context to the site these include:

1. Broomers Hill Industrial Estate

- 2.10 The Estate lies directly to the west of the site. It comprises 14 units of Class E (light industrial) and B8 employment uses within 2 storey brick buildings that are accessed via Broomers Hill

Lane. The Estate itself is well screened with a line of trees / hedgerow to the north and west.

2. Eastside of Codmore Hill

2.11 To the south of the site, along Stane Street towards the main urban area lies the eastside of Codmore Hill. It comprises a range of modern and semi modern single and two storey properties with relatively large gardens. The design guide notes that there are also several historic properties near the junction with Cray Lane.

2.12 Key characteristics include the low density and scale with properties set back from the road and off street parking. In terms of materials, it is noted that the more modern buildings are often red brick with softer coloured detailing and tiled roofing and the older properties comprise more mellowed local stone or stock red brick.

3. Sopers Cottages

2.13 The cottages are a pre World War Two linear row of social housing located on the east of Stane Street. They are set back from the main road and visually screened. Key characteristics are the homogenous design, height, fenestration patterns and materials.

4. Stane Street Close

2.14 Stane Street Close is a 1950's cul de sac located

on the western side of Stane Street. It is laid out formally around a small public open space which contributes strongly towards the sense of place. Development is of relatively low density with common materials, fenestration and heights throughout.

5. Masons Way

2.15 Located on the west side of Codmore Hill, Masons Way is one of the largest single cul-de-sac developments in Pulborough. It is a relatively high density modern development comprising a range of detached, semi detached and terraced properties of a range of styles and materials.

6. Commercial

2.16 There are a number of commercial areas along Stane Street and to the south of Codmore Hill. These include Sainsbury's, Tescos and car showrooms. They are characteristic commercial style developments.

7. A range of sub areas of Pulborough

2.17 Pulborough itself lies to the south of Codmore Hill. It comprises a wide range of built development, from historic properties along the main road to more recent modern style developments.

Sustainability

2.18 It is generally accepted that walking offers the potential to substitute short car journeys, in particular those that are less than 2 kilometres. The location of existing residences (potential workforce) and day to day services and facilities in relation to a proposed site is therefore of key consideration.

2.19 Footways are provided along the A29 Stane Street providing access to Codmore Hill and Pulborough village centre, which would allow employees and visitors to walk safely to local facilities. There is a footway along the southern side of Broomers Hill Lane between the access to the Industrial Estate and the A29.

2.20 There is a wide range of residences that would be within walking distance of the site if it were their place of employment. There are a number of facilities within easy walking distance of the site, including the existing Industrial Estate (within 100 metres), a restaurant (within 150 metres) and bus stops.

2.21 A cafe lies within 800m of the north of the site and a large supermarket (Sainsbury's) lies within 800m walking distance of the site to the south, which is within the walking distance considered appropriate by various technical guidance documents.

2.22 Within 1,500m, to the south lies another



Figure 5 - Entrance to Pulborough adjacent to the entrance to the site



Figure 6 - Phase 1 of the business park



Figure 7 - Part of the site used for car parking



Figure 8 - The cleared site



Figure 9 - Local Tesco superstore



Figure 10 - Train station



Figure 11 - Local high street



Figure 12 - Local Sainsbury's superstore

supermarket (Tesco), a pharmacy and healthcare centre.

- 2.23 For those wishing to walk further afield, Pulborough village centre is 2km, which is approximately a 20 minute walk. Pulborough contains facilities including shops, pubs and a railway station.
- 2.24 The nearest bus stops are located on Stane Street within 300m of the site access, i.e. a 3.5 minute walk.
- 2.25 The roads surrounding the site are generally low trafficked and on gentle gradients, which is conducive for cyclists.
- 2.26 The whole of Codmore Hill and Pulborough (and beyond) can be easily reached by bicycle and is well within the 5km cycling distance widely considered to be appropriate to encourage day to day use. Cycling is therefore considered to be a viable travel choice for future employees at the site.
- 2.27 Pulborough Railway Station is located approximately 2.3km from the site and can be reached within a 10 minute bicycle ride, making cycling a favourable option as part of a multi-modal journey when travelling from the wider area.

Public Transport

- 2.28 The bus stops on Stane Street is within a 3.5 minute walk and are served by the 69 and 100 bus services. The 100 service provides a connection to Billingshurst, Pulborough, Burgess Hill and Horsham every hour between Monday and Saturday.
- 2.29 The nearest railway station is in Pulborough, which is served by the 100 bus service (a 7 minute journey). Regular services operate from Pulborough to London Victoria and Bognor Regis.

Public Rights of Way

- 2.30 There are no public footpaths which cross the Site and the Site is not publicly accessible.



3

Planning History

Extant Planning Permission

- 3.1 Planning application DC/13/1048 was granted a hybrid planning permission on 24th September 2013 for the expansion of the existing business park, it comprised:

"Proposed development of 10 No. B1/B8 units with 55 parking spaces, 2 disabled spaces & 10 LGV parking spaces and outline consent for a further B1/B8 unit with 10 car parking spaces."

- 3.2 The decision notice splits the relevant conditions into an outline component and a detailed component.

- Part A is identified as the outline element with all matters reserved for future consideration whereby consent was sought for one B1/B8 unit with car parking; and
- Part B is the full element whereby all reserved matters were provided for within the application

with consent sought for 10 units (with associated car parking). Part B providing access and infrastructure to serve part A.

- 3.3 Implementation is stated within the detailed component of the decision notice to be required to take place within 3 years of the date of the permission. Therefore, the latest date that the consented development could have commenced was the 23rd September 2016. Accordingly, WTLH discharged the conditions in respect of this part of the planning permission and made an initial start on site on 23rd September 2016.

- 3.4 Alongside this, WTLH submitted a reserved matters application (Ref: DC/16/2006) on 2nd September 2016 which was approved on 21st December 2016 for:

"Reserved matters pursuant to DC/13/1048 (Proposed development of 10 No. B1/B8 units with 55 parking spaces, 2 disabled spaces & 10 LGV parking spaces and outline consent for a further B1/B8 unit with 10 car

parking spaces) and seeks confirmation of compliance with conditions 2, 4, 11, 13, 16 and 18 of outline permission DC/13/1048."

- 3.5 A Certificate of Lawful Development was issued by the Council in 2026 confirming that a lawful start had been made and the scheme is extant.

- 3.6 Approved plans are:

- Design & Access Statement Drwg no. REV E Received: 09.08.2013;
- Location plan Drwg no. 0001 P4 Received: 05.06.2013;
- Site plan Drwg no. 0002 PS Received: 09.08.2013;
- Proposed Floor & Elevations plan Drwg no. 0100 P2 Received: 05.06.2013;
- Proposed Floor & Elevations plan Drwg no. 0200 P2 Received: 05.06.2013;



Figure 14 - Originally approved floorplans and elevations (Part B)

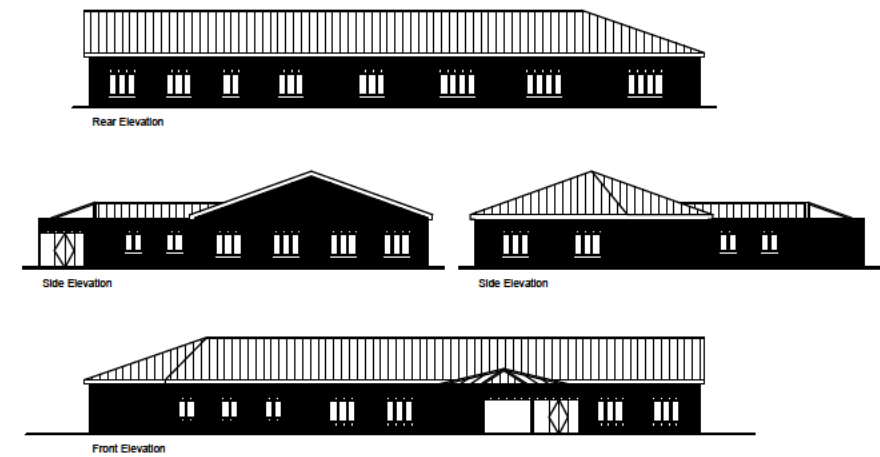


Figure 16 - Approved elevations (Part A)



Figure 15 -Originally approved floorplans and elevations (Part B)

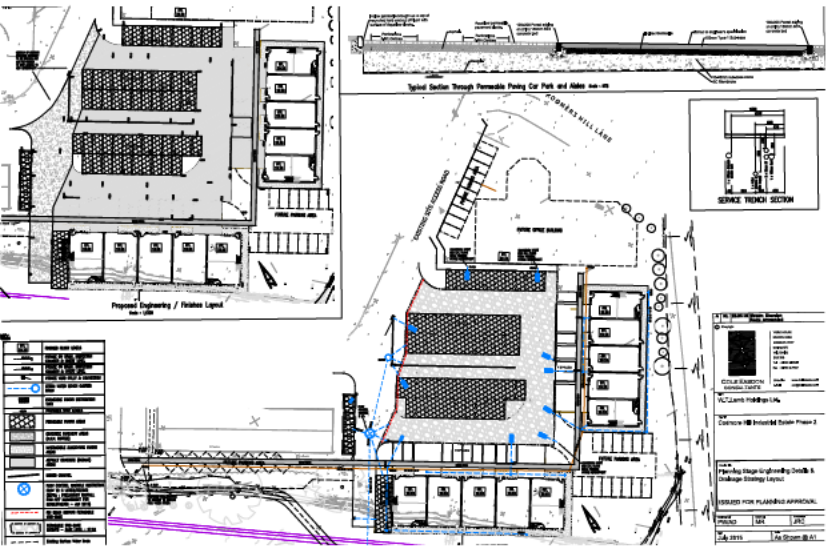


Figure 17 - Engineering layout.

- Proposed Floor & Elevations plan Drwg no. 0300 P3 Received: 02.08.2013;
- Street Scene plan Drwg no. 0500 P3 Received: 09.08.2013;
- Supporting Documents Drwg no. NONE Received: 05.06.2013;
- Transport Statement Drwg no. JRT/1932 Received: 05.06.2013;

3.7 Other LARGE VEHICLE STRATEGY Received: 09.08.2013;

3.8 Other ARTICULATED HGV PLAN Received: 09.08.2013; and

3.9 Other LANDSCAPE STRATEGY PLAN Received: 15.08.2013.

3.10 In addition the following were approved via discharge of condition applications.

- Layout Plan CSA/2250/113 22.07.2016;
- Roof Plan 1202 22.07.2016;
- Layout Plan 4528/SK100 A 22.07.2016;
- Site plan 1210 22.07.2016;

- Floor plan 1201 22.07.2016;
- Elevation plan 1200 22.07.2016;
- Elevation plan 600 22.07.2016;
- Planning Method Statement 22.07.2016;
- Travel Plan Statement 22.07.2016; and
- Planning Stage Method Statement 22.07.2016.

Phase 3 Expansion

3.11 The land to the south of the existing business park and phase 2 area is allocated within the Pulborough Neighbourhood plan and proposed to be allocated in the emerging Horsham Local Plan. It is feasible that access could be provided through the existing site.



Figure 18 - Land allocated to the south of the site as phase 3



Figure 19 - Emerging local plan proposed allocation

4 The Proposals



Figure 20 -Proposed site plan (Area B)

Overview

- 4.1 Whilst the description will remain the same, and the scheme has been implemented, the scope of this application s73 is limited to Part B of application reference DC/13/1048 which was granted in full.
- 4.2 The updated proposals are shown on the following plans prepared by Place By Design;
- 1749_200A Broomers Hill Park Proposed Site Plan; and
 - 1749_3200 Broomers Hill Park Units 1-10 Plans and Elevations.
- 4.3 The proposed changes seek to combine the previously consented (and extant) two blocks of Part B, into one single block with associated updates to approved infrastructure, landscape and associated plans.

- 4.4 The revised Part B layout presents several clear advantages when compared to the previously approved hybrid scheme. Most notably, the proposal consolidates all 10 units into a single building, rather than splitting them across two structures, while maintaining the same overall floorspace as permitted. This more compact arrangement delivers practical and environmental benefits. In particular, it removes the need to divert the stream at the southern boundary, reducing engineering works and potential ecological disturbance. The repositioning of the building away from the eastern edge of the site also enables the retention of existing boundary trees, helping to preserve established landscape features and visual screening.

- 4.5 Collectively, these changes result in a more efficient and sensitive form of development and, importantly, provide a swift and deliverable solution that secures Spellmans' long-term presence in the area, offering certainty for both

the business and the local authority.

- 4.6 The description of development remains:

Proposed development of 10 No. B1/B8 units with 55 parking spaces, 2 disabled spaces & 10 LGV parking spaces and outline consent for a further B1/B8 unit with 10 car parking spaces

- 4.7 It is noted that the ridge height of the proposed building is the same as for the approved scheme (9.15m). However, the eaves level has slightly increased (from 6.3m to 7m), albeit the overall height (to ridge) remains the same.
- 4.8 The provision of parking is tied to the description within the original consent, therefore the proposals comprise 55 parking spaces, now including provision for EV charging points. 5 EV dual charging points are proposed (providing capacity for 10 cars to be charged at a time).



Figure 21 - Proposed "street scene"

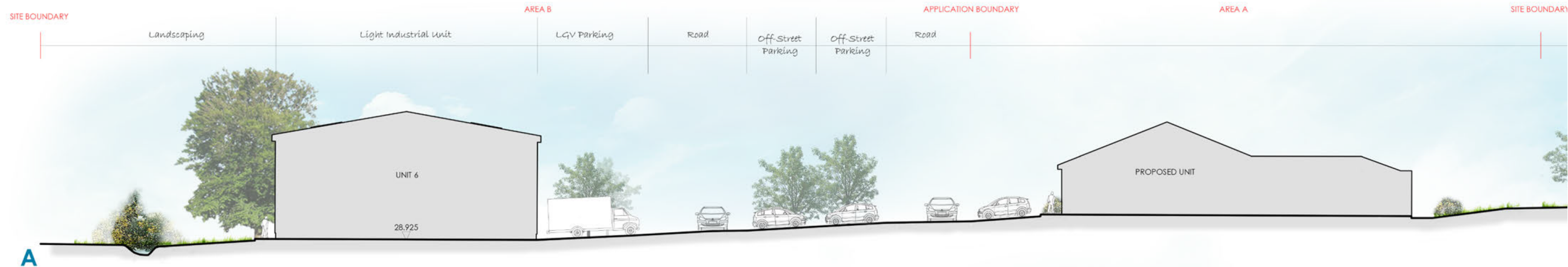


Figure 22 - Site cross section



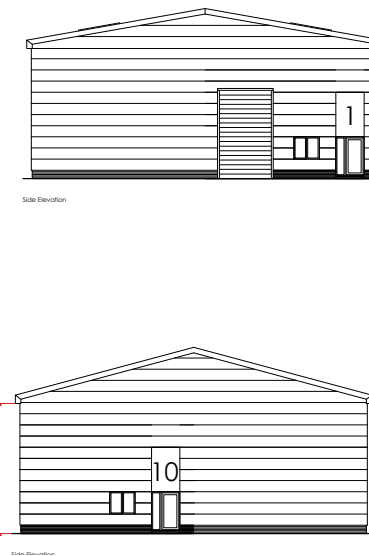
Figure 23 - 3D view of "extant" building alongside the existing units



Figure 24 - 3D view of the proposed building alongside the existing units



Figure 25 -Proposed elevations



Drainage

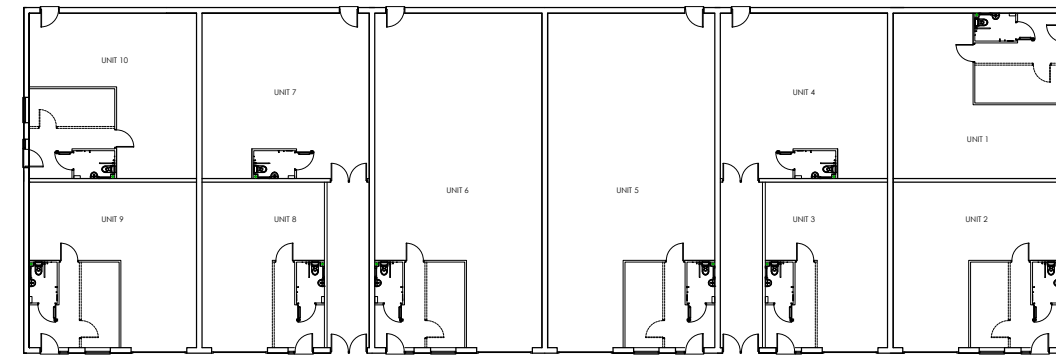
- 4.9 The proposed development comprises industrial units and access/parking areas forming an impermeable catchment of 3,520m². It is proposed that surface water runoff from this catchment is disposed of by discharge into the watercourse at the site's south western boundary, at the QBAR discharge rate (3.1) l/s for all storms up to the 1 in 100 year + 45% storm event.
- 4.10 Attenuation will be provided within a Sustainable Urban Drainage System (SuDS) cellular storage tank beneath the hardstanding in the centre of the site. The tank has been designed to accommodate post development runoff from storms up to the 1 in 100 year + 45% storm event, in accordance with NPPF requirements.
- 4.11 In the event of blockage, failure or a storm in excess of the design parameters, floodwaters would emanate from the flow control chamber and enter the watercourse as overland flow. Any water issuing from the upstream drainage system would follow the topography of the site and gravitate towards the watercourse.
- 4.12 Water quality has been assessed in line with the Simple Index approach from Chapter 26 of CIRIA C753 The SuDS Manual. The proposed SuDS will provide adequate treatment for post development runoff.

- 4.13 It is proposed that all drainage devices will be maintained in perpetuity by a private management company acting on behalf of the site owner.
- 4.14 Foul flows will be connected to the existing private foul drain in the adjacent industrial park, which discharges into a public foul sewer in the A29. Based on Sewer Sector Guidance, the proposed industrial development covering 0.35ha will generate a small peak foul flow rate of 0.2 l/s. A sewer capacity check application has been sent to Southern Water to understand if capacity exists within the downstream public sewer system to accommodate the proposed foul flows.

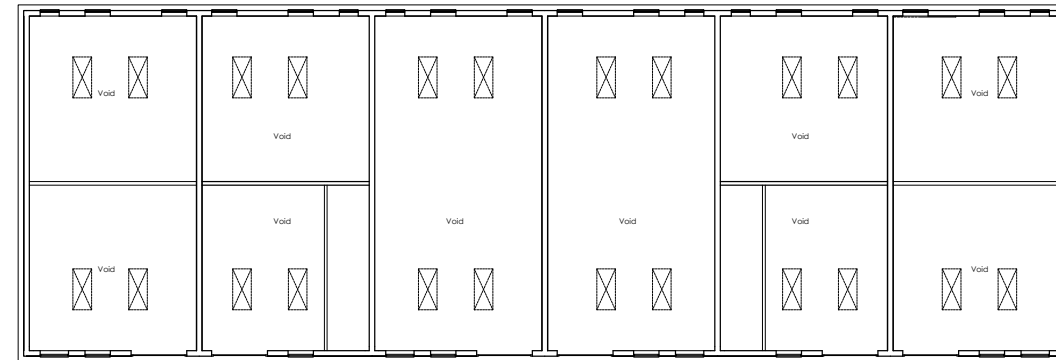
Ecology

- 4.15 GreenLink Ecology Ltd. was commissioned to document the ecological and protected species survey work that has been completed for the site, and to detail the mitigation and enhancement measures that have been/will be implemented for the site. The results of the SxBRC desk study indicate that the statutory designated South Downs National Park is present in the Zol, along with notable habitat types. There are also SAC present in the wider area. Since it is considered that the proposals would not have any significant impacts on designated sites/notable habitats, mitigation measures are not considered necessary.

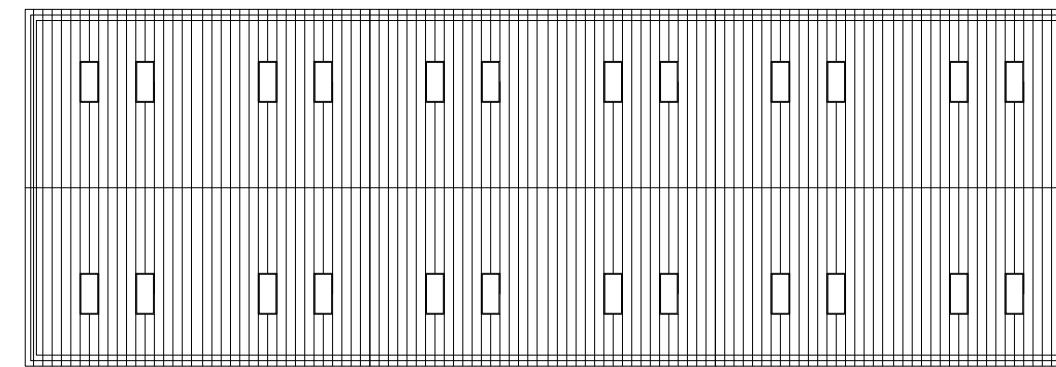
- 4.16 The SxBRC desk study data also includes protected/notable species records from within the Zol, which of relevance to the site includes bats, birds, great crested newt, hazel dormouse and reptiles. The site contains common/widespread habitats that are not of conservation concern and since impacts to most of these habitat types are considered to be insignificant, mitigation measures are only required for retained trees, as detailed in the report by SJA Trees, which will be protected in accordance with BS 5837:2012 "Trees in Relation to Design, Demolition and Construction - Recommendations".
- 4.17 The results of the 2018 and 2025 bat survey indicate that the site appears to be of limited importance to the local bat population, other than in association with occasional commuting/ foraging. However, there is flightline between the Mens SAC barbastelle maternity woodland and a hibernation site, which appears to be located close to the site's north/eastern boundary and the associated tree line may represent a habitat feature of seasonal importance.
- 4.18 Therefore, mitigation measures have been recommended to avoid the risk of indirect impacts. Potentially suitable breeding bird habitat was removed outside the breeding season and retained boundary vegetation and trees will be isolated from the construction site.



Ground Floor Plan



First Floor Plan



First Floor Plan

Figure 26 -Floorplans (10 units)

via the use of 'heras' fencing, to ensure that there is no risk of affecting birds during the breeding season.

- 4.19 The results of the laboratory analysis of water samples from the pond located to the north-west of the site have proven that there is no great crested newt eDNA present in P1 during 2018 or 2025, and in 2020 there was insufficient standing water present. Although the risk of impacts was considered to be low, great crested newt was a consideration during the mitigation strategy that was implemented for breeding birds and reptiles. There were no great crested newt or any other species of amphibian recorded as present at any time.

- 4.20 Since there was no evidence of hazel dormouse recorded during the 2018 and 2025 surveys and the species will therefore not be affected by the proposals, mitigation measures are not required for hazel dormouse.

- 4.21 Hedgehog was a consideration during the mitigation strategy that was implemented for breeding birds and reptiles, with no hedgehogs recorded as present. On a precautionary basis, mitigation measures have also been recommended to avoid the risk of impacts during the construction phase. The reptile survey conducted in 2018 and 2025 recorded a low numbers of three reptile species. During the mitigation strategy implemented in April-May

2026, low number of slow worms were carefully trapped and translocated into the receptor site, with no killing/injury taking place and five clear days with no reptiles being recorded as present being achieved within a 30 day period. Once the Section 73 application has been approved, the strategy will be concluded with an ECoW supervised a destructive search.

- 4.22 Ecological enhancement measures have also been added, including:

- 16 no. native species of tree – extra heavy stock, 16-18cm girth, which include specimens that will be planted alongside the eastern boundary, to enhance the existing tree line;
- Species-rich biodiverse turf areas to the south and east, to buffer the existing vegetated boundaries from the development;
- Non-native ornamental planting around the development;
- 4 no. Schwegler bat boxes to be installed above 4-5 metres from ground level on the mature oak T4 and on mature tree line poplars on the eastern boundary, not illuminated by any artificial lighting; and
- 8 no. Schwegler bird boxes (4 no. oval entrance, 2 no. 26mm entrance and 2 no. 32mm entrance, available from <https://www.nhbs.com/>), to be

installed above 3-4 metres from ground level on the mature oak T4 and on tree line poplars on the eastern boundary on different aspects but not facing south to avoid the risk of over-heating during the summer breeding season.

Landscape & Trees

- 4.23 Figure 27 sets out the updated landscape scheme for the new layout. It includes the retention of the row of Lombardy poplars that were to be removed in the approved scheme. An appropriate detailed scheme of planting is also provided.

- 4.24 It is noted that an updated tree survey has been undertaken and a number of trees that were previously identified to be removed (in the extant permission) are now being retained. As a result the tree report concludes that the proposals will not result in any alteration to the main arboricultural features of the site, to the overall arboricultural character of the site and will not have an adverse impact on the arboricultural character and appearance of the local landscape.

- 4.25 As no trees are to be pruned, and none of the proposed buildings will be within 5m of the extents of the canopies of the individual trees to be retained, there will be adequate working



Figure 27 - Proposed updated landscape scheme

space for construction close to trees, and a reasonable margin of clearance for future growth.

- 4.26 Incursions into the Root Protection Areas of trees to be retained are minor, and subject to implementation of the measures recommended on the Tree Protection Plan no significant or long-term damage to their root systems or rooting environments will occur. This includes improving existing hard surface with new surface layer to be installed no deeper than the sub-base of the existing hard surface in the RPA of the Oak (4) and hand dig techniques in the minor areas of the RPA's of tree no's 14 and 17.

Access

- 4.27 Access remains in line with the consented scheme via the existing access on Broomers Hill Lane, which currently caters for a range of vehicle types and sizes and remains appropriate.
- 4.28 The provision of parking is tied to the description within the original consent, therefore the proposals comprise 55 parking spaces, 2 disabled space and 10 HGV spaces. However, they now include 5 dual mounted EV charging points are proposed (allowing for the charging of 10 EV's).
- 4.29 The approved scheme identified 18 cycle parking spaces for areas A and B, the proposed

site plan solely for area B shows a cycle shelter to the east of the building, which will accommodate 12 bicycles (the remaining 6 will be within area A). In addition the site plan shows 10 motorcycle spaces to accord with the number shown on the approved scheme.

Materials

- 4.30 A modern approach to the materials palette (figures 29 to 32) has been sought that is based on the high performance energy efficiency composite system with green roller shutters that take their lead from the signage for the Park itself. It is considered that the approach will create a clean and modern appearance. Plinth bricks will be provided by the site owner who is a local supplier of bricks.

Building Fabric Performance Values		Building Services & Renewable/LZC Technologies	
Walls	0.2 W/m2K	Heating/Cooling	Electric panel heaters and electric air heaters (100% Efficiency)
Roof	0.16 W/m2K	Lighting	100% LED
Floor	0.15 W/m2K	Hot Water	Ariston Andris Lux 2kW 10l Storage Electric DHW (100% efficiency)
Glazing	1.4 W/m2K	Building Management	Thermostatic controls on the heating system, and programmers to panel heaters additionally.
Doors	1.4 W/m2K	Renewable/LZC Technology	136kW roof mounted PV array
Vehicle Doors	1.3 W/m2K		
Air Permeability	5m3/(hr.m2)		

Figure 28 - Proposed energy strategy

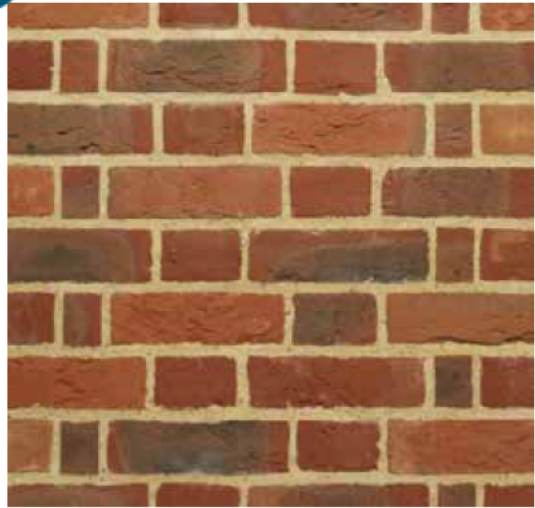


Figure 29 - Lambs local Local red brick to ground floor plinth elevation (Chartwell Blended Multi Stocks)



Figure 30 - Grey windows (RAL 7015 'Slate Grey')



Figure 31 - Walls above plinth Euroclad Rockspan composite system (RAL 7035 'Light Grey')



Figure 32 - Roller shutters HAG armourguard (RAL 6038 'Luminous Green')

Energy

- 4.31 An energy strategy has been submitted in order to demonstrate the sustainability credentials of the scheme.
- 4.32 This is based on an energy modelling exercise, undertaken using the following building fabric, building services, and renewable and LZC technologies proposed for the development as shown in figure 28.
- 4.33 Summarily, the development's all electric systems are supported by a 136kW Solar PV array and climate adaptation techniques have been implemented where practical, such as the optimisation of building orientation to reduce unwanted solar gains, simplification of form to allow for improved air-tightness and reduced thermal bridging, and maximising the use of natural ventilation and daylight via rooflights specified with double skin obscure systems to minimise solar gain.

Travel Plan

- 4.34 An updated Travel Plan has been prepared and includes a range of measures to encourage a modal shift towards non car modes of transport. These include:
- Staff travel packs setting out information about car sharing clubs, public transport details etc. A dedicated intranet page for Travel Planning including information on car share schemes, facilities and public transport;
 - Personal Travel Planning advise for staff; and
 - Facilities to include more sustainable forms of travel including cycle spaces and 5 dual mounted EV charging stations (facilitating the charging of 10 EV's).



5 Conclusion

- 5.1 This Design and Access Statement has been prepared on behalf of WT Lamb Holdings Lts in order to support their proposed s73 variation at Broomers Hill Industrial Estate at Codmore Hill.
- 5.2 It sets out the background to the site, the extant planning permission and how the proposed variation has been approached. In this regard it confirms that there will be significant design, ecology, landscape and drainage enhancements that would not be delivered if the extant permission was to be carried forward.
- 5.3 Accordingly, the variations provide a high quality and modern series of changes that will provide an important economic opportunity as well as deliver benefits over the existing scheme.



T: 02920 349 737 E: admin@lrmplanning.com www.lrmplanning.com
22 Cathedral Road, Cardiff CF11 9LJ

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