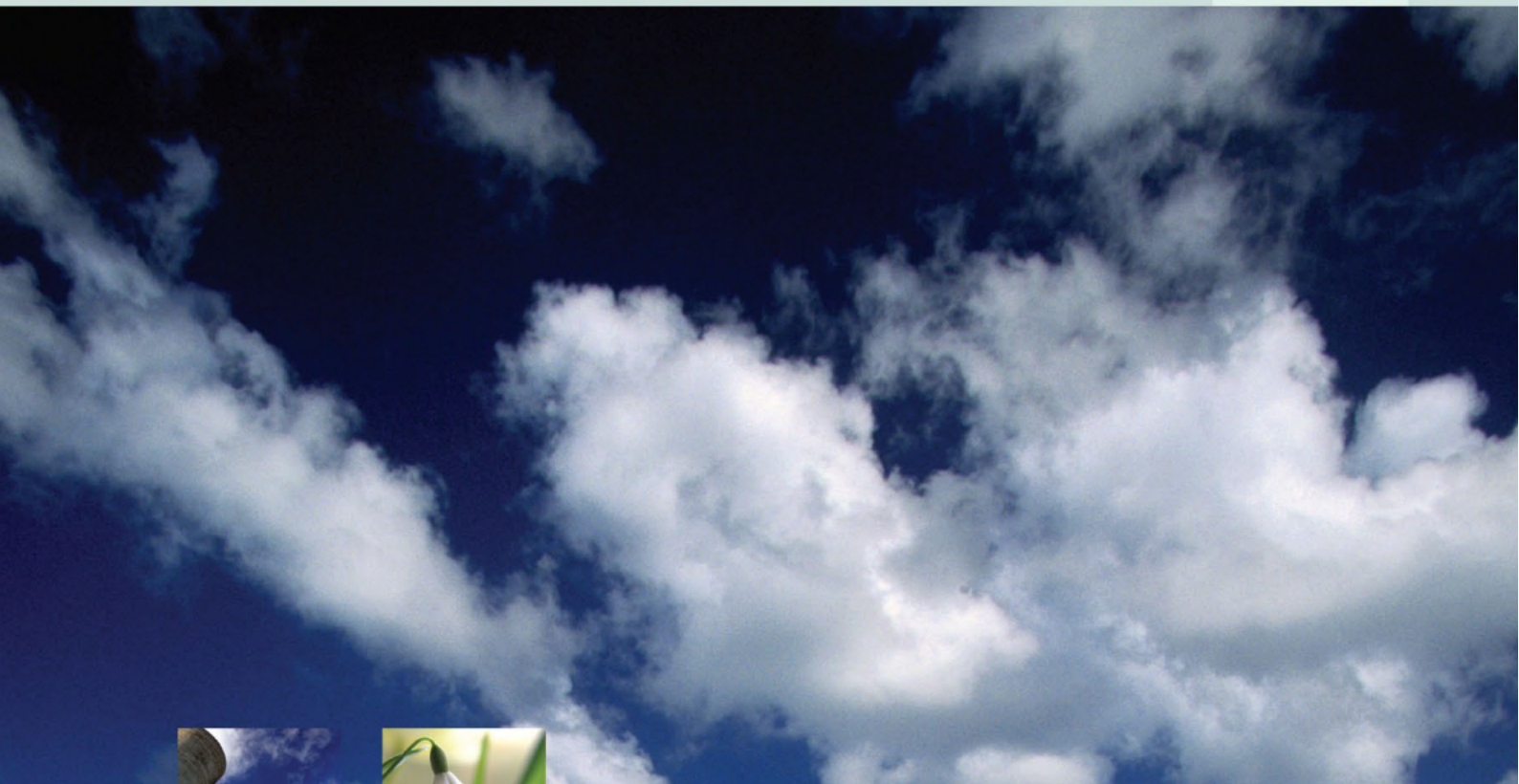




Sustainability Statement

Codmore Hill Industrial Estate Phase 2

Broomers Hill Lane, Codmore Hill

Prepared for:
Philips Surveyors Ltd

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1. INTRODUCTION

1.1 Background

Sol Environment Ltd ('Sol' hereafter) were engaged by Philips Surveyors Ltd ('the Applicant' hereafter) to undertake a sustainability assessment and produce a Sustainability Statement for Codmore Hill Industrial Estate (Phase 2), a proposed new Industrial Development on land off Broomers Hill Lane, Codmore Hill.

This report has been prepared by Sol Environment Ltd in cooperation with the applicant and in accordance with the following policies and guidance:

- Horsham District Planning Framework (Published 2015) referring specifically to the following policies:
 - Policy 24 – Strategic Policy: Environmental Protection
 - Policy 25 – Strategic Policy: The Natural Environment and Landscape Character
 - Policy 26 – Strategic Policy: Countryside Protection
 - Policy 30 – Protected Landscapes
 - Policy 31 – Green Infrastructure and Biodiversity
 - Policy 33 – Development Principles
 - Policy 35 – Strategic Policy: Climate Change
 - Policy 36 – Strategic Policy: Appropriate Energy Use
 - Policy 37 – Sustainable Construction
 - Policy 38 – Strategic Policy: Flooding
 - Policy 40 – Sustainable Transport
 - Policy 41 – Parking

This report has been prepared to support a Section 73 application for the proposed industrial development, known as Area B at Codmore Hill Industrial Estate, Codmore Hill.

1.2 Proposed Development

The proposed development comprises of the construction of a new Industrial Development on land off Broomers Hill Lane, Codmore Hill, which is currently a part of the existing Codmore Hill Industrial Estate. The new development consists of two phases. This report assesses the phase B development, comprising of 10 warehouse units with ancillary spaces, each of varying size within one industrial block. The units will be fitted out to a shell and core specification.

A site plan showing the proposed development is provided overleaf.



Fig 2.1: Proposed Site Plan prepared by Place By Design

A schedule of the overall site information use and associated gross internal areas is provided in Table 2.1 below.

Table 2.1: Gross Internal Area of the proposed development

Building Use Type	Number of Units	Gross Internal Area (m ²)
Industrial Development	10	964
Total	10	964

The proposed areas include 10 warehouse units within one industrial block. This Sustainability Statement has been set out to show how the site addresses the relevant environmental and sustainability issues outlined in the Horsham District Planning Framework (Published 2015).

2. PLANNING POLICY

There are a number of international and national policy drivers for sustainability, increased energy efficiency and reduced Carbon Dioxide (CO₂) emissions, which have been introduced to address the issue of global warming and the implications of climate change. On an international level this includes the Kyoto Protocol, to which the UK government has made a commitment and developed national policies such as the Energy White Paper and the NPPF.

At the local level, the current Local Plan in particular remains a material consideration. These policies and documents are described in further detail within the section below.

2.1 National Policy

2.1.1 National Planning Policy Framework

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how they are expected to be applied. It sets out a framework that aims to achieve sustainable development throughout the planning system with three overarching objectives – economic, social and environmental.

At the heart of the NPPF is a 'presumption in favour of sustainable development', which requires Local Authorities as part of any plan-making or decision-making, to provide clear guidance on how the presumption should be applied locally.

The NPPF sets out how to deliver sustainable development under 17 subheadings. Subheading 14 of the NPPF outlines how the planning system should support the transition to a low carbon future in a changing climate, taking full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

2.2 Local Policy

2.2.1 Horsham District Planning Framework (Published 2015)

The following policies are relevant to the proposed sustainability criteria of the development:

Policy 24

Strategic Policy: Environmental Protection

The high quality of the district's environment will be protected through the planning process and the provision of local guidance documents. Taking into account any relevant Planning Guidance Documents, developments will be expected to minimise exposure to and the emission of pollutants including noise, odour, air and light pollution and ensure that they:

1. Address land contamination by promoting the appropriate re-use of sites and requiring the delivery of appropriate remediation;
2. Are appropriate to their location, taking account of ground conditions and land instability;

3. Maintain or improve the environmental quality of any watercourses, groundwater and drinking water supplies, and prevents contaminated run-off to surface water sewers;
4. Minimise the air pollution and greenhouse gas emissions in order to protect human health and the environment;
5. Contribute to the implementation of local Air Quality Action Plans and do not conflict with its objectives;
6. Maintain or reduce the number of people exposed to poor air quality including odour. Consideration should be given to development that will result in new public exposure, particularly where vulnerable people (e.g. the elderly, care homes or schools) would be exposed to the areas of poor air quality; and
7. Ensure that the cumulative impact of all relevant committed developments is appropriately assessed.

Policy 25

Strategic Policy: The Natural Environment and Landscape Character

The Natural Environment and landscape character of the District, including the landscape, landform and development pattern, together with protected landscapes and habitats will be protected against inappropriate development.

The Council will support development proposals which:

1. Protects, conserves and enhances the landscape and townscape character, taking into account areas identified as being of landscape importance, the individual settlement characteristics, and maintains settlement separation.
2. Maintain and enhances the Green Infrastructure Network and addresses any identified deficiencies in the District.
3. Maintains and enhances the existing network of geological sites and biodiversity, including safeguarding existing designated sites and species, and ensures no net loss of wider biodiversity and provides net gains in biodiversity where possible.
4. Conserve and where possible enhance the setting of the South Downs National Park.

Policy 26

Strategic Policy: Countryside Protection

Outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to its countryside location, and in addition meet one of the following criteria:

1. Support the needs of agriculture or forestry;
2. Enable the extraction of minerals or the disposal of waste;
3. Provide for quiet informal recreational use; or
4. Enable the sustainable development of rural areas.

In addition, proposals must be of a scale appropriate to its countryside character and location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside, and protects, and/or conserves, and/or enhances, the key features and characteristics of the landscape character area in which it is located, including;

1. The development pattern of the area, its historical and ecological qualities, tranquillity and sensitivity to change;
2. The pattern of woodlands, fields, hedgerows, trees, waterbodies and other features; and
3. The landform of the area.

Policy 30

Protected Landscapes

1. The natural beauty and public enjoyment of the High Weald AONB and the adjoining South Downs National Park will be conserved and enhanced and opportunities for the understanding and enjoyment of their special qualities will be promoted. Development proposals will be supported in or close to protected landscapes where it can be demonstrated that there will be no adverse impacts to the natural beauty and public enjoyment of these landscapes as well as any relevant cross boundary linkages.
2. Proposals should have regard to any management plans for these areas and must demonstrate:
 - a. How the key landscape features or components of natural beauty will be conserved and enhanced.
This includes maintaining local distinctiveness, sense of place and setting of the protected landscapes, and if necessary providing mitigation or compensation measures.
 - b. How the public enjoyment of these landscapes will be retained.
 - c. How the proposal supports the economy of the protected landscape and will contribute to the social wellbeing of the population who live and work in these areas.
3. In the case of major development proposals in or adjoining protected areas, applicants will also be required to demonstrate why the proposal is in the public interest and what alternatives to the scheme have been considered.

Policy 31

Green Infrastructure and Biodiversity

1. Development will be supported where it can demonstrate that it maintains or enhances the existing network of green infrastructure. Proposals that would result in the loss of existing green infrastructure will be resisted unless it can be demonstrated that new opportunities will be provided that mitigates or compensates for this loss, and ensures that the ecosystem services of the area are retained.
2. Development proposals will be required to contribute to the enhancement of existing biodiversity, and should create and manage new habitats where appropriate. The Council will support new development which retains and/or enhances significant features of nature conservation on development sites. The Council will also support development which makes a positive contribution to biodiversity through the creation of green spaces, and linkages between habitats to create local and regional ecological networks.
3. Where felling of protected trees is necessary, replacement planting with a suitable species will be required.
4. a. Particular consideration will be given to the hierarchy of sites and habitats in the district as follows:

- i. Special Protection Area (SPA) and Special Areas of Conservation (SAC)
 - ii. Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs)
 - iii. Sites of Nature Conservation Importance (SNCIs), Local Nature Reserves (LNRs) and any areas of Ancient woodland, local geodiversity or other irreplaceable habitats not already identified in i & ii above.
- b. Where development is anticipated to have a direct or indirect adverse impact on sites or features for biodiversity, development will be refused unless it can be demonstrated that:
 - i. The reason for the development clearly outweighs the need to protect the value of the site; and,
 - ii. That appropriate mitigation and compensation measures are provided.
5. Any development with the potential to impact Arun Valley SPA or the Mens SAC will be subject to a HRA to determine the need for an Appropriate Assessment. In addition, development will be required to be in accordance with the necessary mitigation measures for development set out in the HRA of this plan.

Policy 33

Development Principles

In order to conserve and enhance the natural and built environment developments shall be required to:

1. Make efficient use of land, and prioritise the use of previously developed land and buildings whilst respecting any constraints that exist;
2. Ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land, for example through overlooking or noise, whilst having regard to the sensitivities of surrounding development;
3. Ensure that the scale, massing and appearance of the development is of a high standard of design and layout and where relevant relates sympathetically with the built surroundings, landscape, open spaces and routes within and adjoining the site, including any impact on the skyline and important views;
4. Are locally distinctive in character, respect the character of the surrounding area (including its overall setting, townscape features, views and green corridors) and, where available and applicable, take account of the recommendations/policies of the relevant Design Statements and Character Assessments;
5. Use high standards of building materials, finishes and landscaping; and includes the provision of street furniture and public art where appropriate;
6. Presume in favour of the retention of existing important landscape and natural features, for example trees, hedges, banks and watercourses. Development must relate sympathetically to the local landscape and justify and mitigate against any losses that may occur through the development; and,
7. Ensure buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, unless this conflicts with the character of the surrounding townscape, landscape or topography where it is of good quality.

Proposals will also need to take the following into account where relevant:

8. Incorporate where appropriate convenient, safe and visually attractive areas for the parking of vehicles and cycles, and the storage of bins/recycling facilities without dominating the development or its surroundings;
9. Incorporate measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area; and create visually attractive frontages where adjoining streets and

public spaces, including appropriate windows and doors to assist in the informal surveillance of public areas by occupants of the site;

10. Contribute to the removal of physical barriers; and,
11. Make a clear distinction between the public and private spaces within the site.

Policy 35

Strategic Policy: Climate Change

Development will be supported where it makes a clear contribution to mitigating and adapting to the impacts of climate change and to meeting the district's carbon reduction targets as set out in the Council's Acting Together on Climate Change Strategy, 2009.

Measures which should be used to mitigate the effects of climate change include;

1. Reduced energy use in construction;
2. Improved energy efficiency in new developments, including influencing the behaviour of occupants to reduce energy use;
3. The use of decentralised, renewable and low carbon energy supply systems;
4. The use of patterns of development which reduce the need to travel, encourage walking and cycling and include good accessibility to public transport and other forms of sustainable transport; and
5. Measures which reduce the amount of biodegradable waste sent to landfill.

Development must be designed so that it can adapt to the impacts of climate change, reducing vulnerability, particularly in terms of flood risk, water supply and changes to the district's landscape. Developments should adapt to climate change using the following measures:

1. Provision of appropriate flood storage capacity in new building development;
2. Use of green infrastructure and dual use SuDS to help absorb heat, reduce surface water runoff, provide flood storage capacity and assist habitat migration;
3. Use of measures which promote the conservation of water and/or greywater recycling; and
4. Use of site layout, design measures and construction techniques that provide resilience to climate change (opportunities for natural ventilation and solar gain).

If it is not possible to incorporate the adaption and mitigation measures proposed, an explanation should be provided as to why this is the case.

Policy 36

Strategic Policy: Appropriate Energy Use

Energy hierarchy

All development will be required to contribute to clean, efficient energy in Horsham based on the following hierarchy:

1. Lean – use less energy – e.g. through demand reduction
2. Clean – supply energy efficiently – e.g. through heat networks
3. Green – use renewable energy sources

District Heating and Cooling

Commercial and residential developments in Heat Priority Areas or the strategic development locations will be expected to connect to district heating networks where they exist using the following hierarchy, or incorporate the necessary infrastructure for connection to future network.

Development should demonstrate that the heating and cooling systems have been selected in accordance with the following heating and cooling hierarchy;

1. Connection to existing (C)CHP distribution networks
2. Site wide renewable (C)CHP
3. Site wide gas-fired (C)CHP
4. Site wide renewable community heating/cooling
5. Site wide gas-fired community heating/cooling
6. Individual building renewable heating
7. Individual building heating, with the exception of electric heating

All (C)CHP must be of a scale and operated to maximise the potential for carbon reduction. Where site-wide (C)CHP is proposed, consideration must be given to extending the network to adjacent sites.

Energy Statements

All applications for residential or commercial development must include an Energy Statement demonstrating and quantifying how the development will comply with the Energy Hierarchy.

Developments in Heat Priority Areas and strategic developments should demonstrate and quantify how the development will comply with the heating and cooling hierarchy. Horsham District Council will work proactively with applicants on major developments to ensure these requirements are met.

Renewable energy schemes

The Council will permit schemes for renewable energy (e.g. solar) where they do not have a significant adverse effect on landscape and townscape character, biodiversity, heritage or cultural assets or amenity value. Community initiatives which seek to deliver renewable and low carbon energy will be encouraged.

Policy 37

Sustainable Construction

Proposals must seek to improve the sustainability of development. To deliver sustainable design, development should incorporate the following measures where appropriate according to the type of development and location:

1. Maximise energy efficiency and integrate the use of decentralised, renewable and low carbon energy;
2. Limit water use to 110 litres/person/day;
3. Use design measures to minimise vulnerability to flooding and heatwave events;
4. Be designed to encourage the use of natural lighting and ventilation;
5. Be designed to encourage walking, cycling, cycle storage and accessibility to sustainable forms of transport;
6. Minimise construction and demolition waste and utilise recycled and low-impact materials;
7. Be flexible to allow future modification of use or layout, facilitating future adaptation, refurbishment and retrofitting;

8. Incorporate measures which enhance the biodiversity value of development.

All new development will be required to provide satisfactory arrangements for the storage of refuse and recyclable materials as an integral part of design.

New homes and workplaces should include the provision of high-speed broadband access and enable provision of future technologies where available.

Policy 38

Strategic Policy: Flooding

1. Development proposals will follow a sequential approach to flood risk management, giving priority to development sites with the lowest risk of flooding and making required development safe without increasing flood risk elsewhere. Development proposals will;
 - a. take a sequential approach to ensure most vulnerable uses are placed in the lowest risk areas.
 - b. avoid the functional floodplain (Flood zone 3b) except for water-compatible uses and essential infrastructure.
 - c. only be acceptable in Flood Zone 2 and 3 following completion of a sequential test and exceptions test if necessary.
 - d. require a site-specific Flood Risk Assessments for all developments over 1 hectare in Flood Zone 1 and all proposals in Flood Zone 2 and 3.
2. Comply with the tests and recommendations set out in the Horsham District Strategic Flood Risk Assessment (SFRA).
3. Where there is the potential to increase flood risk, proposals must incorporate the use of sustainable drainage systems (SuDS) where technically feasible, or incorporate water management measures which reduce the risk of flooding and ensure flood risk is not increased elsewhere.
4. Consider the vulnerability and importance of local ecological resources such as water quality and biodiversity when determining the suitability of SuDS. New development should undertake more detailed assessments to consider the most appropriate SuDS methods for each site. Consideration should also be given to amenity value and green infrastructure.
5. Utilise drainage techniques that mimic natural drainage patterns and manage surface water as close to its source as possible will be required where technically feasible.
6. Be in accordance with the objective of the Water Framework Directive, and accord with the findings of the Gatwick Sub Region Water Cycle Study in order to maintain water quality and water availability in rivers and wetlands and wastewater treatment requirements.

Policy 40

Sustainable Transport

There is commitment to developing an integrated community connected by a sustainable transport system. In order to manage the anticipated growth in demand for travel, development proposals which promote an improved and integrated transport network, with a re-balancing in favour of non-car modes as a means of access to jobs, homes, services and facilities, will be encouraged and supported.

Development will be supported if it:

1. Is appropriate and in scale to the existing transport infrastructure, including public transport.
2. Maintains and improves the existing transport system (road, rail, cycle).
3. Is integrated with the wider network of routes, including public rights of way and cycle paths.
4. Includes opportunities for sustainable transport which reduce the need for major infrastructure and cut carbon emissions.
5. Is located in areas where there are, or will be a choice in the modes of transport available.
6. Minimises the distance people need to travel and minimises conflicts between traffic, cyclists and pedestrians.
7. Delivers better local bus and rail services in partnership with operators and increasing opportunities for interchange between the public transport network and all other modes of transport.
8. Develops innovative and adaptable approaches to public transport in the rural areas of the district.
9. Provides safe and suitable access for all vehicles, pedestrians, cyclists, horses riders, public transport and the delivery of goods.
10. Is accompanied by an agreed Green Travel Plan where it is necessary to minimise a potentially significant impact of the development on the wider area or as a result of needing to address an existing local traffic problem.

Policy 41

Parking

1. Development should seek to improve parking in town centres so it is convenient, safe and secure. Parking provision must ensure a balance between good urban design, highway safety, residential amenity and promoting town centre attractiveness and vitality.
2. Adequate parking and facilities must be provided within developments to meet the needs of anticipated users. Consideration should be given to the needs of cycle parking, motorcycle parking, charging plug-in or other low emission vehicles and the mobility impaired.
3. Development which involves the loss of existing parking spaces will only be allowed if suitable alternative provision has been secured elsewhere or the need for the development overrides the loss of parking and where necessary measures are in place to mitigate against the impact.
4. Planning permission will not be granted for off-airport parking facilities related to Gatwick Airport unless a need can be demonstrated and all realistic alternatives have been examined.

2.3 Summary of Policy Requirements

Table 3.1 provides an overview of policy and legislative requirements and their applicability to the proposed development;

Table 3.1: Overview of Policy requirements

Policy	Requirement
Policy 24 – Strategic Policy: Environmental Protection	The development should minimise exposure to and the emission of pollutants including noise, odour, air and light pollution, with careful consideration of land contamination, ground conditions, and safeguarding water, air, and public health.

Policy	Requirement
Policy 25 – Strategic Policy: The Natural Environment and Landscape Character	The development should protect and enhance landscape character, the Green Infrastructure Network, geological sites and biodiversity, including safeguarding existing designated sites and species, and ensuring no net loss of wider biodiversity and providing net gains in biodiversity where possible. The proposal should conserve and where possible enhance the setting of the South Downs National Park.
Policy 26 – Strategic Policy: Countryside Protection	The development must enable the sustainable development of rural areas, or meet criteria relating to agriculture, forestry, extraction of minerals, waste disposal or recreational uses. The development must not lead to an increase in overall level of activity in the countryside, and protect and enhance the pattern of woodlands, fields, hedgerows, trees, waterbodies and other features, as well as the landform of the area.
Policy 30 – Protected Landscapes	The development must demonstrate there will be no adverse impacts to Protected Landscapes (including High Weald AONB and the adjoining South Downs National Park) and relevant cross boundary linkages. The proposal must support the economy of the protected landscape and will contribute to the social wellbeing of the population who live and work in these areas.
Policy 31 – Green Infrastructure and Biodiversity	The development should maintain or enhance green infrastructure. Any loss must be mitigated or compensated for. The development must enhance biodiversity, and should create and manage new habitats where appropriate, create green spaces, and linkages between habitats to create local and regional ecological networks. All felled protected trees must be replaced.
Policy 33 – Development Principles	Developments will be required to retain existing important landscape and natural features, relate sympathetically to the local landscape and justify and mitigate against any losses that may occur through the development. Developments must ensure buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, unless this conflicts with local character. Where relevant, incorporate cycle parking, and the storage of bins/recycling facilities without dominating the development or its surroundings.
Policy 35 – Strategic Policy: Climate Change	Development should mitigate and adapt to climate change through energy efficiency, sustainable transport, reduction in biodegradable waste to landfill, and the use of decentralised, renewable and low carbon energy supply systems. Development must be designed so that it can adapt to the impacts of climate change, reducing vulnerability, particularly in terms of flood risk,

Policy	Requirement
	water supply and changes to the district's landscape. The building should provide flood storage capacity, implement SuDS, water conservation methods, and use passive design measures to provide resilience to climate change.
Policy 36 – Strategic Policy: Appropriate Energy Use	The development must provide an Energy Statement demonstrating and quantifying how the development will comply with the Energy Hierarchy.
Policy 37 – Sustainable Construction	The development should: maximise energy efficiency and integrate the use of decentralised, renewable and low carbon energy; limit water use to 110 litres/person/day; minimise vulnerability to flooding and heatwave events; encourage the use of natural lighting and ventilation; encourage walking, cycling, cycle storage and accessibility to sustainable forms of transport; minimise construction and demolition waste and utilise recycled and low-impact materials; be flexible to allow future modification of use or layout, facilitating future adaptation, refurbishment and retrofitting; and enhance the biodiversity value of development. The development must provide satisfactory arrangements for the storage of refuse and recyclable materials, and should provide high-speed broadband access and enable provision of future technologies.
Policy 38 – Strategic Policy: Flooding	The development must comply with the tests and recommendations set out in the Horsham District Strategic Flood Risk Assessment, and be in accordance with the Water Framework Directive, and the findings of the Gatwick Sub Region Water Cycle Study. Developments over 1 hectare in Flood Zone 1 must provide a site-specific Flood Risk Assessments. The proposals should undertake a SuDS feasibility assessment and implement them where feasible, or incorporate water management measures. The building must use drainage techniques that mimic natural drainage patterns and manage surface water as close to its source as possible where technically feasible.
Policy 40 – Sustainable Transport	The development should promote non-car modes via an appropriate site location and scale, maintain and improve the existing transport system, integrate with the wider network of routes, include opportunities for sustainable transport, provide safe and accessible access, and provide an agreed Green Travel Plan where required.
Policy 41 – Parking	The development must provide adequate parking and facilities to meet the needs of anticipated users. Consideration should be given to the needs of cycle parking, motorcycle parking, charging plug-in or other low emission vehicles and the mobility impaired.

3. SUSTAINABILITY ASSESSMENT

This section comprises the Sustainable Design Statement for the proposed development. The Sustainability Statement outlines the measures proposed in order to ensure compliance with the Horsham District Planning Framework (Published 2015), with a particular focus on the following parameters:

- Energy Use
- Flood Risk
- Water use
- Materials
- Natural and Green Environment
- Sustainable Travel
- Waste

3.1 Energy Use

Relevant Policy	Policy 24 – Environmental Protection Policy 33 – Development Principles Policy 35 – Climate Change Policy 36 – Appropriate Energy Use Policy 37 – Sustainable Construction
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Policy 35 and Policy 37 of the Horsham District Planning Framework stipulate the development should improve energy efficiency and use decentralised, renewable and low carbon energy supply systems to mitigate the effects of climate change and adapt to the impacts of climate change by use of site layout, design measures and construction techniques, such as providing opportunities for natural ventilation and solar gain.

Compliance has been demonstrated with Policy 35 and Policy 37, given 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.

Policy 36 of the Horsham District Planning Framework requires developments provide an Energy Statement demonstrating and quantifying how the development will comply with the Energy Hierarchy. Compliance with Policy 36 has been determined following an energy modelling exercise, as summary of which is detailed in Table 3.1 overleaf.

Table 3.1: Energy Assessment Results: Energy Hierarchy

Scenario	Energy Demand (kWh / year)	Energy saving achieved (%)	Regulated CO ₂ Emissions (kgCO ₂ / year)	Saving achieved in CO ₂ emissions (%)
Benchmark Building	172,743	-	16,668	-
Be Lean (improved building fabric and lighting)	151,191	12%	14,577	13%
Be Clean	151,191	-	14,577	-
Be Green (addition of 138kW PV array)	51,908	66%	6,028	59%
Total Savings in Energy and Emissions	120,835	70.0%	10,640	64%

A demonstration of the savings in carbon emissions across all stages of the energy hierarchy, is included in Figure 3.1 below.

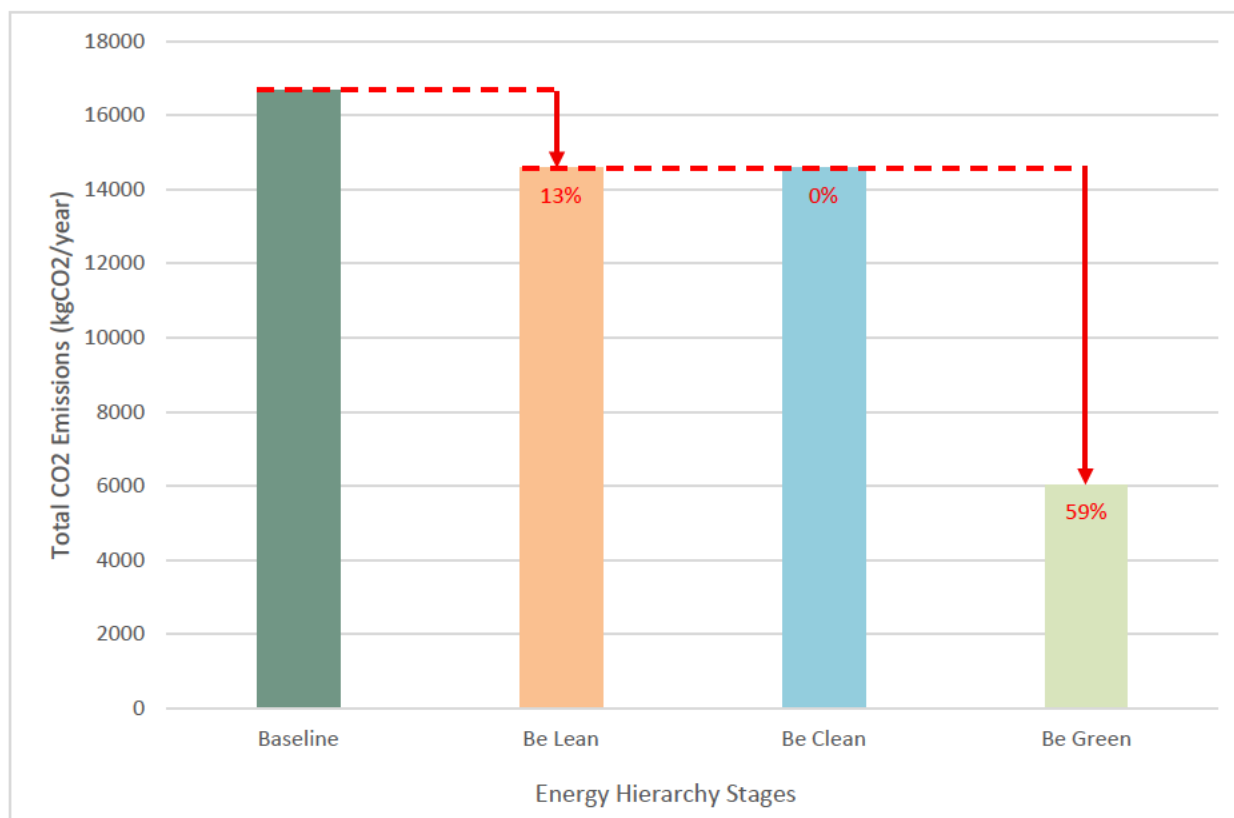


Fig 3.1: Energy Strategy CO₂ emissions reduction

The energy assessment and subsequent design has been prepared such that it is aligned with the Energy Hierarchy, with particular focus on sustainable building design (reduction of energy consumption at source), provision of energy efficiency measures, and the installation of building-integrated low and zero carbon (LZC) technologies.

The conclusion of the energy strategy is that, based on planning stage calculations and implementation of the Energy Hierarchy, the proposed development achieves a 64% CO₂ emissions saving and a 70% energy saving over a baseline building with Part L limiting fabric and lighting systems. The development meets the Part L benchmark in relation to carbon emissions, through the implementation of the 136kW Solar PV array. The PV array achieves an estimated carbon equivalent emission saving of approximately 8.55 tonnes per annum.

Compliance against a 2021 Part L Compliant Benchmark Building is demonstrated in Table 3.3 below.

Table 3.3: Energy Assessment Results: Part L

Scenario	Building Primary Energy Rate (kWh _{PE} / m ² .year)	Energy saving achieved (%)	Building CO ₂ Emission Rate (kgCO ₂ / m ² .year)	Saving achieved in CO ₂ emissions (%)
2021 Part L Compliant Benchmark Building (TER/TPER)	57.85	-	6.17	-
Proposed Building (BER/BPER)	53.13	8%	6.17	0%

Details of the building fabric, building services, and renewable and LZC technologies proposed for the development are summarised within Table 3.2 below.

Table 3.2: Proposed Building Design Values

Building Fabric Performance Values		Building Services & Renewable/LZC Technologies	
Walls	0.2 W/m ² K	Heating/Cooling	Electric panel heaters and electric air heaters (100% Efficiency)
Roof	0.16 W/m ² K	Lighting	100% LED
Floor	0.15 W/m ² K	Hot Water	Ariston Andris Lux 2kW 10l Storage Electric DHW (100% efficiency)
Glazing	1.4 W/m ² K	Building Management	Thermostatic controls on the heating system, and programmers to panel heaters additionally.
Glazed Doors	1.4 W/m ² K	Renewable/LZC Technology	136kW roof mounted PV array
Vehicle Doors	1.3 W/m ² K		
Air Permeability	5m ³ /(hr.m ²)		

For more details including a breakdown of passive building design measures and a low and zero carbon technology feasibility study, please refer to the Energy Statement prepared by Sol Environment.

3.2 Flood Risk

Relevant Policy	Policy 24 – Environmental Protection Policy 35 – Climate Change Policy 37 – Sustainable Construction Policy 38 – Flooding
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Planning has a key role to play in managing flood risk for climate adaptation as water stress and extreme weather events are likely to become more severe in future. In areas which are susceptible to flooding, development proposals should ensure that the buildings are designed to be flood compatible or incorporate flood resilient measures to mitigate flood risk. This is incorporated into in accordance with all the requirements of the Lead Local Flood Authority (LLFA) and the National Planning Policy Framework (NPPF).

Using EA Flood Map for Planning it can be determined that the site is with Flood Zone 1, which is considered to have less than 1 in 1000 annual probability of river or sea flooding within any one year. The site has been assessed to be at low or very low risk for all flood sources.

Key flood mitigation measures include on-site Sustainable Urban Drainage Systems (SUDS) to manage runoff from the site. The SUDS will accommodate runoff from storms up to the 1 in 100 year + 45% climate change event, in accordance with NPPF requirements, and will therefore remain effective for the lifetime of the development, accounting for future increases in rainfall intensity predicted to occur due to climate change.

A 924m² x 0.4m deep cellular attenuation tank able to store a volume of 320.4m³ is proposed beneath the car park hardstanding to accommodate the design storm at the proposed discharge rate. It is proposed that discharge to the watercourse will be limited to the QBAR greenfield discharge rate (3.1 l/s) for all storms up to the 1:100 yr + 45% climate change event by means of a Hydrobrake flow control.

Foul discharge will be to public foul sewer via the existing private foul drainage system serving the business park.

For more information, please refer to the Surface Water Drainage Layout prepared by Cole Easdon.

3.3 Water Use

Relevant Policy	Policy 35 – Climate Change Policy 37 – Sustainable Construction
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The conservation of water resources and maximising resource efficiency is a central theme within the Horsham District Planning Framework. Policy 37 proposes developments should limit water use to 110 litres/person/day.

To reduce the consumption of potable water from all sources and limit the water consumption, it is recommended that the following water using features are installed with similar or better flow rates stated within Table 3.1.

Table 3.1 Flow rates for commercial water-consuming components

Commercial Components	Rate	Units
Taps (flow rate)	4.5	Litres/min
WC (dual flush volume)	3 / 4.5	Litres
Urinals	3	Litres/bowl/hour
Showers (flow rate)	6	Litres/min
Bath (volume to overflow)	140	Litres
Kitchenette sink taps	5	Litres/min
Restaurant (pre-rinse nozzle)	7.3	Litres/min
Dishwasher (domestic sized)	12	Litres /cycle
Washing Machine (domestic sized)	40	Litres/use
Waste Disposal Unit	0	Litres/min
Dishwasher (commercial-sized)	5	Litres /rack
Washing Machine (commercial sized)	7.5	Litres/kg

It is recommended that water leak detection systems are considered for instalment on the incoming mains for the commercial units.

To further reduce the water consumption of the development smart water metering and the use of alternative water supplies such as rainwater harvesting should be considered.

3.4 Materials

Relevant Policy	Policy 37 – Sustainable Construction
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Policy 37 of the Horsham District Planning Framework stipulates the development should incorporate measures to utilise recycled and low-impact materials.

All materials associated with the development are recommended to be sourced with consideration for the embodied construction impacts. As such the site and building should comprise, where possible, of local sustainably sourced materials of a sufficiently robust construction to ensure a long life without the need for regular maintenance or replacement.

In selecting other materials, the following issues are recommended to be considered. The design and construction team should:

- Preferentially selected those materials with a lesser environmental impact;

- Review alternative materials that have a lower environmental impact when developing material specification, including recycled materials; and
- Review the embodied energy within potential building materials and reduction of the embodied energy where feasible.

3.5 Natural and Green Environment

Relevant Policy	Policy 25 – Strategic Policy: The Natural Environment and Landscape Character Policy 26 – Countryside Protection Policy 30 – Protected Landscapes Policy 31 – Green Infrastructure and Biodiversity Policy 33 – Development Principles Policy 35 – Climate Change Policy 37 – Sustainable Construction
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An Ecological Impact Assessment has been conducted by GreenLink Ecology Ltd. to document the ecological and protected species survey work that has been completed for the site and detail the mitigation and enhancement measures that have been and will be implemented for the site. Below is a summary of their conclusions.

The results of a SxBRC desk study indicate that the statutory designated South Downs National Park is present in the Zone of Influence, 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.

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"*.

The site appears to be of limited importance to the local bat population, other than in association with occasional commuting/foraging. A flightline 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 and so will be retained to avoid the risk of indirect impacts to bats. In addition, the T4 mature oak and vegetated boundaries to the north, south and east will be retained. A precautionary lighting scheme will be in place, designed in compliance with the Institute of Lighting Professional (ILP) and BCT published guidance note 08/2311 (Appendix 7).

Potentially suitable breeding bird habitat was removed outside the breeding season and retained boundary vegetation and trees will be isolated from the construction site via the use of 'heras' fencing, to ensure that there is no risk of affecting birds during the breeding season.

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.

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.

Hedgehogs were 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 number 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.

A protocol is implemented requiring works to temporarily cease if great crested newt or hazel dormouse is recorded as present and to consult a Natural England licence holder. If at any time hedgehog or other protected/notable species are found to be present, an experienced ecologist will need to be consulted and protocols reviewed.

The following ecological enhancement measures will be considered for inclusion in the landscape proposals, to ensure that the proposed works benefit local biodiversity, in accordance with the principles of the NPPF:

- 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; and
- Non-native ornamental planting around the development that incorporates a proportion of species that are beneficial to wildlife.
- 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;
- 8 no. Schwegler bird boxes 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 overheating during the summer breeding season; and
- Consideration should be given to the viability of integrating/mounting bat and bird boxes on the proposed building, if the construction type/materials used permit this.

For further information, please refer to the Ecological Impact Assessment prepared by GreenLink Ecology Ltd.

3.6 Sustainable Travel

Relevant Policy	Policy 33 – Development Principles
	Policy 35 – Climate Change

	Policy 37 – Sustainable Construction Policy 40 – Sustainable Transport Policy 41 – Parking
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The site is well located to encourage commuter trips by walking, cycling and public transport. It is located approximately 2.3km from Pulborough Railway Station which can be accessed via a 10-minute bicycle ride, or 13 minutes by a combination of bus and walking. It is predicted that a multi-modal journey is favourable when travelling to the wider area.

The nearest bus stops to the site are located a 6 minute walk (500m) to the south of the site, and can be accessed via a direct footway. The southbound stop provides shelter, seating, timetable data and a layby, and the northbound stop provides timetable data and a layby. The stops are both serviced by the number 69 (providing a limited service) and 100 (providing a regular service, with the northbound service also operating a 'Hail & Ride' service).

The site connects to the local pedestrian network via the adjacent footways which provide access to the residential areas of Codmore Hill (500m) and those towards Pulborough (2km to 2.4km). Billingham, Adversene, North Heath, Pulborough, Codwalham and Storrington are within a 30-minute cycle ride of the site (8km). There are limited cycle facilities in the area surrounding the site, but it is recognised that cycling may be a favourable option due to the number of residential areas which are within cycling distance. The site is accessed off Broomers Hill Lane, which is approximately 6m wide, unlit and provides a footway on its western side between the A29 and Broomers Hill Park. Broomers Hill Lane crosses the Arun Valley Railway Line as a level crossing approximately 200m south of the A29.

The proposed site plan shows a cycle shelter to the east of the assessed Area B building to accommodate 12 bicycles. 55 car parking spaces, 2 disabled spaces & 10 LGV parking spaces are also proposed.

The site proposes to facilitate the EV charging of 10 cars using up to 22KW 3 phase EV pedestal smart chargers with localised load management. Information about a car sharing system will be included within the Sustainable Travel Plan, and employees who state on their travel surveys that they are interested in car sharing will be contacted with the aim to match suitable people up. Incentives and a complimentary ride home service will be investigated by the Travel Plan Coordinator.

The Travel Plan targets a reduction in the number of single occupancy car trips by 10%, whilst at the same time providing a 5% increase in car sharing, a 2% increase in walking and public transport, and a 1% increase in cycling when compared to census data.

For further information, please refer to the Travel Plan Statement prepared by Miles White Transport Ltd.

3.7 Waste

Relevant Policy	Policy 33 – Development Principles Policy 35 – Climate Change Policy 37 – Sustainable Construction
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The development site will utilise sustainable design and construction to minimise the impact the building has on the environment. Good site practices will be employed during the construction phase in order to minimise waste during construction and operation and promote the circular economy.

3.7.1 Construction Waste

The Horsham District Planning Framework stipulates the development should incorporate measures to minimise construction and demolition waste.

A construction management plan will be in place and adhered to throughout the entire construction period. The plan covers procedures for wheel washing required for all HGV operatives exiting the site in order to safeguard the condition of the highway outside the site. In addition, the plan also provides an anticipated waste management collection via skip lorries frequency of once a week over the contracted period, and a maximum of three times a week for no more than three weeks. The document also provides an anticipated average delivery frequency of six times per day, with a size of 7.5-25 tonnes.

It is recommended that a Site Waste Management Plan (SWMP) will be implemented to encourage the principles of the waste hierarchy which are to reduce, reuse and recycle waste. The following measures will be implemented;

- Ensuring that all contractors are contractually obliged to participate in reducing waste from site, which is included in our Sustainability Policy
- Reduction of materials wastage through efficient buying, good storage and handling
- Use of Modern Methods of Construction for a significant proportion of the development, allowing significant reductions in waste and facilitating greater recycling
- Entering into agreements with suppliers for recovery and disposal of their products including plasterboard offcuts, insulation offcuts and timber pallets
- Ensuring that all suppliers of materials provide returnable practicably recyclable packaging
- Providing sustainability training, including waste minimisation, for all the construction site team
- Regular toolbox talks throughout the construction phase to raise awareness of the importance of minimising; segregating and recycling wastes during the construction process
- Ensuring adequate waste storage facilities are provided for both raw materials and waste streams generated (e.g. Timber, Metal, Plasterboard and General Waste)
- Ensuring adequate security measures are in place

3.7.2 Operational Waste

An operational waste strategy will be in place to provide arrangements for the storage and collection of refuse and recyclable materials generated during occupation of the site and identify measures to minimise the quantity of biodegradable waste sent to landfill. Waste management arrangements will enable occupiers to segregate waste streams effectively, maximise recycling rates, and minimise the quantity of biodegradable waste sent to landfill in accordance with national and local planning policy objectives and the principles of sustainable development.

The strategy will be in accordance with the principles of the waste hierarchy, prioritising waste prevention, reuse, recycling, and recovery before disposal, and is detailed below:

Waste Generation

The proposed industrial units are expected to generate a range of operational wastes, including: general residual waste, dry mixed recyclables (paper, cardboard, plastics, metals, and glass), commercial packaging materials, pallets and reusable transport packaging, and limited quantities of biodegradable waste associated with staff welfare facilities and landscaping maintenance. Individual occupiers will be responsible for managing their own waste streams in accordance with relevant waste legislation and duty of care requirements.

Refuse and Recycling Storage Arrangements

Each industrial unit will be provided with dedicated waste storage facilities within its service yard or designated storage area. These will be conveniently located for occupiers and collection contractors and will be accessible for collection vehicles without causing obstruction to internal circulation routes. Sufficient capacity will be provided for anticipated waste arisings between collections, and the area will be enclosed or screened where appropriate to maintain visual amenity. The area will be hard surfaced, capable of being washed down, and provide allowance for segregation of waste streams to maximise recycling rates.

Typical storage provision will include 'the occupiers' providing separate containers for: residual (non-recyclable) waste, mixed dry recyclables, cardboard and packaging waste where required by occupiers, and any specialist commercial waste streams generated by individual businesses. Occupiers may provide additional waste containers where operational requirements dictate.

Collection Arrangements

Waste and recyclable materials will be collected by licensed commercial waste contractors at frequencies appropriate to the needs of individual occupiers. Collection vehicles will be able to access the site via the internal road network and service areas designed to accommodate commercial vehicle movements. All waste management activities will comply with relevant environmental and health and safety legislation.

Measures to Reduce Biodegradable Waste Sent to Landfill

The development incorporates a number of measures to minimise biodegradable waste disposal and support sustainable waste management. These include the provision of segregated recycling facilities to maximise recovery of recyclable materials, alongside encouragement for occupiers to implement their own waste management plans and recycling initiatives. Paper reduction and digital working practices will be promoted where practicable, and food waste will be segregated from staff welfare facilities where generated and suitable collection services are available. Cardboard packaging and wooden pallets will be reused or recycled where possible, while licensed waste contractors will be used that prioritise recycling and energy recovery over landfill disposal. Landscaping arisings will be composted or otherwise appropriately treated where feasible. Overall waste management will adhere to the waste hierarchy to minimise residual waste requiring disposal.

Through these measures, the development is expected to significantly reduce the amount of biodegradable waste sent to landfill and maximise opportunities for recycling and resource recovery.

4. SUMMARY

Horsham District Council is committed to achieving sustainable development. As a result, the current planning policies emphasise the importance of sustainable growth with particular emphasis on the encouragement of energy efficiency and sustainable travel. It is important, therefore, that the proposed development site contributes to the Council's sustainability aims as well as meeting regional and national objectives for sustainable development.

This sustainability statement demonstrates that the proposal satisfies a number of key objectives, responding to local needs and requirements and conforming to current good practice. The site selected demonstrates a sustainable allocation for development.

An Energy Statement has been produced demonstrating and quantifying how the development will comply with the Energy Hierarchy. Based on planning stage calculations, the proposed development achieves a 64% CO₂ emissions saving and a 70% energy saving over a baseline building with Part L limiting fabric and lighting systems. The development meets the Part L benchmark in relation to carbon emissions, through the implementation of the 138kW Solar PV array. The PV array achieves an estimated carbon equivalent emission saving of approximately 8.55 tonnes per annum.

The site has been assessed to be at low or very low risk of flooding from all flood sources. The development incorporates key flood mitigation measures including SUDS to accommodate runoff from storms up to the 1 in 100 year + 45% climate change event, and an attenuation tank and hydrobrake to accommodate the design storm at the proposed discharge rate.

Water conservation will be prioritised by proposing efficient sanitaryware features to limit water use to 110 litres/person/day. Additional water savings measures that will be considered include leak detection, smart metering, and PIR-linked shutoff valves.

The site and building shall comprise, where possible, of local sustainably sourced materials of a sufficiently robust construction to ensure a long life without the need for regular maintenance or replacement. Consideration will be given to materials with a lower embodied energy and lower environmental impact, including recycled materials.

It is considered that the proposals would not have any significant impacts on designated sites/notable habitats, and the site itself contains common/widespread habitats that are not of conservation concern. Since impacts to most of these habitat types are considered to be insignificant, mitigation measures are only required for retained trees. Mitigation measures have also been recommended on a precautionary basis to avoid the risk of direct and indirect impacts to protected or notable species. Ecological enhancement measures have also been recommended to ensure that the proposed works benefit local biodiversity, in accordance with the principles of the NPPF.

Sustainable transport measures are supported by the inclusion of electric vehicle charging spaces, cycle storage spaces, and a Staff Travel Plan which will support a car sharing scheme. The site is well located to encourage commuter trips by walking, cycling and public transport. It is likely that cycling and multi-modal transport will be favoured by commuters travelling to the wider area and residential areas. The Travel Plan targets a reduction in the

number of single occupancy car trips by 10%, whilst at the same time providing a 5% increase in car sharing, a 2% increase in walking and public transport, and a 1% increase in cycling when compared to census data.

It is recommended that a Site Waste Management Plan (SWMP) should be implemented to encourage the principles of the waste hierarchy which are to reduce, reuse and recycle waste.

An operational waste strategy will be in place to provide arrangements for the storage and collection of refuse and recyclable materials generated during occupation of the site and identify measures to minimise the quantity of biodegradable waste sent to landfill. Waste management arrangements will enable occupiers to segregate waste streams effectively, maximise recycling rates, and minimise the quantity of biodegradable waste sent to landfill in accordance with national and local planning policy objectives and the principles of sustainable development.

In summary, the sustainability statement has informed the design process by identifying opportunities and constraints for sustainable development, and the process has highlighted the proposals sustainability performance against national, regional and local planning policy.