



PLANNING, DESIGN AND ACCESS STATEMENT

**Unit 2 East
Southdowns Enterprise Park
Shoreham Road
Henfield
West Sussex
BN5 9SE**

**Change of use of Unit 2 East from B8 Storage & Distribution to
B2 General Industrial Use to include Car Repairs and MOT Class 7**

Client: Coles Automotive Limited

14th July 2026

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1.0 Introduction

- 1.1 Sadler Planning Limited is instructed by Coles Automotive Ltd to submit a change of use from B8 storage and distribution use to B2 general industrial use to include car repairs and MOT Class 7 for Unit 2 of the eastern building at Southdowns Enterprise Park, Shoreham Road, Henfield.
- 1.2 This Planning, Design and Access Statement has been written by Kathryn Sadler BA (Hons) Dip TP MRTPI who has over 24 years experience of working as a Town Planner within local authorities and private practices within the southeast.
- 1.3 The Statement should be read in conjunction with:
- The plans provided by Folkes Architects;
 - The Transport Statement provided by GTA Civils; and
 - The Noise Impact Assessment BS4142 provided by Acoustic South East.

2.0 The Proposal

- 2.1 The application seeks to change the use of Unit 2 of the eastern building at Southdown Enterprise Park from B8 storage and distribution use to B2 general industrial use to include car repairs and MOT Class 7.
- 2.2 Coles Automotive Ltd will be occupying Units 2 and 3 of the building and plan to utilise unit 3 as their reception, offices and while you wait servicing which is covered by the existing consent for Class E (g) (iii) light industrial. Unit 2 is to be used for car repairs and MOT Class 7 which falls under B2 use.
- 2.3 The activity will be while you wait diagnostics, servicing, MOTs, EV servicing, repairs and small repairs like tyre fitting. One MOT bay will be provided and three car lifts will be installed within Unit 2.
- 2.4 The MOT bay proposed in Unit 2 is a Class 7 MOT facility which is suitable for all vehicles, including 4x4 vehicles such as Land Rover and Ineos Grenadier (Coles Automotive is a registered Service Partner for Ineos Grenadier). Class 7 is also able to take the weight of many larger new EVs and hybrid models, which are significantly heavier than their petrol or diesel counterparts due to batteries and electrical components.
- 2.5 The majority of the work undertaken by the garage will utilise highly technical and computerised diagnostic equipment with EV servicing which requires a clean environment.
- 2.6 The eastern building has permitted hours of opening of 07:00 hours to 20:00 hours Monday to Fridays and 07:00 hours to 18:00 hours on Saturdays and 09:00 hours to 14:00 hours on Sundays and Bank Holidays.
- 2.7 Unit 2 has nine parking spaces to the west of the unit. Coles Automotive Ltd also have another thirteen spaces (six to the west of Unit 3 and seven within the southern car park) which will be utilised for the business.
- 2.8 The existing vehicular access will be utilised, and this was considered acceptable by West Sussex Highway Authority in the consideration of application DC/20/0049 which first permitted the industrial buildings.

3.0 The Site and Surrounding Area

- 3.1 The site is located within a countryside location, just south of Henfield village. The site is located on the western side of Shoreham Road opposite Henfield Business Park and north of the Old Brickworks, both industrial / commercial estates.
- 3.2 Within the last five years, the site has been developed with two large buildings being permitted under application DC/20/0049 for B1C (now Class E (g) (iii)) light industrial use, B2 general industrial use and B8 storage and distribution use, parking areas, outside storage, vehicular access and highway works. The western unit on the site is in B2 general industrial use, has outside storage and is utilised by Southdown Engineers.



Photo Above: The Eastern Unit at Southdown Enterprise Park

- 3.3 The site boundaries consist of native hedging and mature trees with new planting proposed within the next planting season in accordance with the approved planting plans.



Photo Above: Units 1, 2 and 3 within the Eastern Building



Photo Above: Units 2 and 3 with parking to the western side



Photo Above: Inside Unit 2



Photo Above: The approved bell mouth and road layout



Photo Above: Coles Automotive seven parking spaces in the southern car park



Photo Above: The Western Unit at Southdown Enterprise Park in B2 use

- 3.4 To the east of the site is Shoreham Road and Henfield Business Park which consists of B1 (now Class E, g), B2 and B8 use buildings. To the south of the site is the Old Brickworks which is in B8 use. To the west of the site is Unit West used by Southdown Engineers for B1 (now Class E, g), B2 and B8 use.
- 3.5 To the north of the site is a mature tree lined boundary and hedging with grazed paddocks which have been allocated for commercial employment development within Henfield Neighbourhood Plan. A planning application (reference DC/26/0556) is currently being considered for the erection of a complex of four buildings comprising twelve industrial units for employment use (office, industrial, storage and distribution uses (B2, B8 & E(g) use)) with associated car parking, access and landscaping.

4.0 Planning History

4.1 The property's relevant planning history is set out below.

HF/50/59	Replacement of wooden kennels with concrete staff accommodation, Permitted 02/12/1959
HF/2/61	Rebuilding of existing kennels, erection of 4 additional kennels, Permitted 08/02/1961.
HF/98/69	Erection of trimming parlour and kitchen, Permitted 09/01/1970.
HF/61/71	Erection of new building for hospitalisation of sick animals, Permitted 12/11/1971.
DC/20/0049	Demolition of existing dwelling, kennels, cattery, animal hospital, grooming parlour and office. Erection of one building for the operation of a business offering hire and sale of nonmechanical plant, plant transport, welfare hire, mechanical repairs and associated offices / sales (B1(a) and (c), B2 and B8 use) associated with Southdown Engineers Ltd together with associated parking and outdoor storage. Erection of a second building for B1(c) and B8 use together with parking and a soft landscaping scheme. The creation of a new vehicular access, blocking up the existing vehicular access, creating a pedestrian access to the bus stops and highway works. Permitted 26/10/2020.
DISC/21/0081	Approval of details reserved by Conditions 3, 5, 6, 9, 10 and 11 on DC/20/0049, Details Discharged on 13/07/2021.
DISC/21/0158	Approval of details reserved by Condition 7 (A-C) to approved application DC/20/0049, Details Discharged 05/08/2021.
DISC/21/0182	Approval of details reserved by Condition 8 to approved application DC/20/20/0049, Details Discharged 13/09/2021
DC/22/0977	Non-material amendment to previously approved application DC/20/0049 to remove 4 x canopies above personnel doors on the north elevation and the most westerly one on the south elevation and extension of cladding to meet ground level on Building 1. Permitted 29/06/2022
DISC/23/0040	Approval of details reserved by Condition 7 (D) to approved application DC/20/0049, Details Discharged 15/02/2023.
DISC/23/0058	Approval of details reserved by Condition 12, 13, 15 and 18 to approved application DC/20/0049, Details Discharged 21/06/2023.
DC/23/2064	Amendment to Application DC/20/0049 to alter the window and door locations, amend the parking layout and landscaping, relocation of cycle store, extension of timber cladding to meet brick plinth, erection of solar

panels on the western roof slope and insertion of a small mezzanine within Unit 3 of Building 2 – Permitted 19/04/2024.

DC/23/2308

Variation of Condition 22 of previously approved application DC/20/0049 (Demolition of existing dwelling, kennels, cattery, animal hospital, grooming parlour and office. Erection of one building for the operation of a business offering hire and sale of non-mechanical plant, plant transport, welfare hire, mechanical repairs and associated offices / sales (B1(a) and (c), B2 and B8 use) associated with Southdown Engineers Ltd together with associated parking and outdoor storage. Erection of a second building for B1(c) and B8 use together with parking and a soft landscaping scheme. The creation of a new vehicular access, blocking up the existing vehicular access, creating a pedestrian access to the bus stops and highway works) Relating to opening hours for trade or business – Permitted 20th March 2024.

DC/26/0267

Removal of Condition 11 of previously approved application DC/23/2064 (Erection of a E(g)(iii) / B8 building (as an amendment to planning permission DC/20/0049 to alter the window and door locations, amend the parking layout and landscaping, relocation of cycle store, extension of timber cladding to meet brick plinth, erection of solar panels on the western roof slope, insertion of a small mezzanine within Unit 3) Relating to Water Neutrality – Permitted 7th April 2026.

5.0 Planning Policy

5.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the policies in the Development Plan, unless other material considerations indicate otherwise.

5.2 The documents that comprise the Development Plan are:

- Horsham District Planning Framework, November 2015;
- Emerging Horsham District Local Plan (2023 – 40) (Regulation 19 Stage)

5.3 Henfield Neighbourhood Plan 2017 - 2031 (Referendum Version) was made in May 2021.

5.4 On 12th December 2024, the revised National Planning Policy Framework (NPPF) was published and sets out the governments planning policies for England and how these are expected to be applied.

National Planning Policy Framework (NPPF) December 2024

5.5 Paragraph 8 indicates that there are three elements to sustainable development, economic, social and environmental.

5.6 Paragraph 11 confirms that the heart Framework is a presumption in favour of sustainable development. For decision-taking, the NPPF states that this means:

“Approving development proposals that accord with an up-to-date development plan without delay; or

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:

- 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*
- 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.”*

5.7 Paragraph 88 states *“Planning policies and decisions should enable:*

- the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- the development and diversification of agricultural and other land-based rural businesses;*
- sustainable rural tourism and leisure developments which respect the character of the countryside; and*

- d) *the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship."*

5.8 Paragraph 89 states *"Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."*

5.9 Paragraph 116 states *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe, taking into account all reasonable future scenarios."*

Horsham District Planning Framework 2015

5.10 Policy 1 (Sustainable Development) states *"When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise."*

5.11 Policy 10 (Rural Economic Development) states *"Sustainable rural economic development and enterprise within the district will be encouraged in order to generate local employment opportunities and economic, social and environmental benefits for local communities."*

In the countryside, development which maintains the quality and character of the area, whilst sustaining its varied and productive social and economic activity will be supported in principle. Any development should be appropriate to the countryside location and must:

1. *Contribute to the diverse and sustainable farming enterprises within the district or, in the case of other countryside-based enterprises and activities, contribute to the wider rural economy and/or promote recreation in, and the enjoyment of, the countryside; and either*
 - a. *Be contained wherever possible within suitably located buildings which are appropriate for conversion or, in the case of an established rural industrial estate, within the existing boundaries of the estate; or*
 - b. *Result in substantial environmental improvement and reduce the impact on the countryside particularly if there are exceptional cases where new or replacement buildings are involved. New buildings or development in the rural area will be acceptable provided that it supports sustainable economic growth towards balanced living and working communities and criteria a) has been considered first.*

2. *Demonstrate that car parking requirements can be accommodated satisfactorily within the immediate surrounds of the buildings, or an alternative, logical solution is proposed."*

5.12 Policy 26 (Countryside Protection) states "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."*

5.13 Policy 33 (Development Principles) states "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."*

5.14 Policy 40 (Sustainable Transport) states *"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."*

5.15 Policy 41 (Parking) states:

- "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."*

Henfield Neighbourhood Plan

- 5.16 Policy 3.1 (Employment Development Site Allocations) states *"The Neighbourhood Plan allocates the following locations as shown on Policy map 2 for employment development, provided the proposal meets all criteria identified against the specific site.*

P3.1.2 The sites covered by Policy 3.1 are:-

E – Southgrounds, Shoreham Road, (allocated within plan)

F – Land north of The Old Brickworks (allocated within plan)

G – The Old Kennels, Project Enterprise (allocated within plan)" {The Application Site}

- 5.17 Policy 3.1.5 (The Old Kennels Site, Project Enterprise (Site G) states:

"The Old Kennels site is allocated for employment use, provided the proposal meets all of the following criteria:

- 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 Henfield and these inform the design and layout of the site.*
- c. The proposal has regard for visibility from the surrounding countryside and provides for landscaping in particular provides screening on the western side.*
- d. The proposal maintains and enhances as far as possible 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.*
- h. All lighting is designed to minimise light pollution and supports the dark skies policy of the South Downs National Park Authority."*

5.18 Policy 3.2 (Development of New and Existing Employment Uses) states:

"P3.2.1 Development proposals for new employment uses or to extend or intensify existing employment uses not covered by Policy 3.1 will be supported, provided:

- a. They are within the built-up area boundary of Henfield or where they are outside the built-up area they can be accommodated within the curtilage of an existing employment site;*
- b. They can demonstrate they will lead to a likely increase in the number and quality of local employment opportunities;*
- c. It can be demonstrated that the traffic generated by the proposal will have acceptable access to the principal Henfield road network the A281 and / or A2037;*
- d. The proposal layout can meet the car parking standards of Policy 4 of the HNP; and*
- e. The design, materials colour, massing, position within the site and landscape scheme is able to minimise any visual impacts on the street scene, local amenity and on any adjoining countryside by the provision and maintenance of effective screening by trees or woodland planting along the boundaries of the site and is in accordance with the Henfield Parish Design Statement."*

6.0 Planning Appraisal

Principle

- 6.1 The site is part of an established industrial estate that was granted consent in October 2020. Application DC/20/0049 granted consent for the *“Demolition of a dwelling, kennels, cattery, animal hospital, grooming parlour and office. Erection of one building for the operation of a business offering hire and sale of non-mechanical plant, plant transport, welfare hire, mechanical repairs and offices / sales (B1, B2 and B8 use) associated with Southdown Engineers Ltd together with associated parking and outdoor storage. Erection of a second building for B1C and B8 use together with parking and a soft landscaping scheme. The creation of a new vehicular access, blocking up the existing vehicular access, creating a pedestrian access to the bus stops and highway works.”*
- 6.2 The site was also allocated for employment development and use within the Henfield Neighbourhood Plan.
- 6.3 The build of the eastern building is just coming to completion and Unit 2 currently has consent for B8 storage and distribution use, whereas Unit 3 has consent for light industrial use.
- 6.4 The western building on the site has consent for B2 use, Henfield Business Park to the east of the site has consent for B2 use and the proposed new industrial units to the north of the site have applied for B2 use which is currently being considered by the Council. Therefore, numerous industrial buildings within close proximity have a B2 general industrial use which has been considered acceptable by the Council in this location.
- 6.5 Paragraph 88 of the NPPF states that planning decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.
- 6.6 Policy 10 (Rural Economic Development) of the HDPF states that *“Sustainable rural economic development and enterprise within the district will be encouraged in order to generate local employment opportunities and economic, social and environmental benefits for local communities. In the countryside, development which maintains the quality and character of the area, whilst sustaining its varied and productive social and economic activity will be supported in principle.”*
- 6.7 It is considered that the change of use would be appropriate in this unit due to the fact, the wider site already has a consented B2 use and numerous other industrial units to the east on Henfield Business Park also have B2 uses. The use of the unit as an MOT centre and car repair garage would contribute to the wider rural economy and be contained within an existing unit and within the existing boundaries of an established rural industrial estate.
- 6.8 Therefore, it is considered that the principle is established in accordance with policy 10 of the HDPF and paragraph 88 of the NPPF.

Rural Economic Development

- 6.9 The proposal would provide additional local employment opportunities and economic, social and environmental benefits for the local community. The business will provide additional jobs for local people and is sustainably located adjacent to two bus stops.
- 6.10 This garage would service customers from Henfield, Small Dole, Steyning, Bramber, Cowfold and other nearby villages providing a vital service to those with cars in the local area.
- 6.11 Therefore, it is considered that the change of use is in accordance with policy 10 of the HDPF as it would maintain the quality and character of the area, whilst sustaining its varied and productive social and economic activity.

Noise Impact Assessment

- 6.12 A Noise Impact Assessment BS4142:2014 was undertaken by Acoustic South East in May 2026 and the purpose of this assessment is to assess any noise effects the garage may have when considering the existing nearby residential noise sensitive receptors (NSRs).
- 6.13 LA90 background sound levels have been measured at the nearest NSR, (Paddock Wood) located approximately 129 metres from Unit 2. As Coles Automotive does not yet operate at Southdown Enterprise Park, an internal long-term measurement was taken at the Applicants existing MOT garage located at Brown's Meadow in Edburton to measure a representative operational period of commercial sound.
- 6.14 Noise levels for the daytime standards and guidelines are detailed in a local planning guidance document which Horsham District Council are a signatory to. No night time periods have been assessed due to no overnight work taking place.
- 6.15 Two class 1 sound level meters were installed. One was located at the proposed site's nearest NSR between the 30th April and the 6th May 2026, to identify the external soundscape and measure the LA90 background sound pressure levels. The second, took place between 6th - 11th of May 2026, was to measure the internal sound pressure levels of Coles Automotive's existing garage at Brown's Meadow, Edburton.
- 6.16 The measured LA90, 15-Minute of the weekday period, for the proposed hours of operation is 50 dB. For both the Saturday and Sunday, the LA90, 15-Minute of the proposed hours of operation is 35 dB. The measured internal sound pressure level of the Brown's Meadow garage is LAeq, 10-Hour is 71 dB.
- 6.17 Additional on-site breakout measurements were undertaken at the proposed site to establish the SRI of the new Garage's shutter doors. The results of the survey and assessment show that the Rating Level generated by the Garage with its shutters closed, when considered at the worst-case Noise Sensitive Receptor (Paddock Wood), is 68 dB below the representative LA90 Background Level. This is during the Garage's weekday 07:00 to 20:00 hours of operation.

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- 6.18 For the hours of operation on Saturday and Sunday (07:00 – 18:00 & 09:00 – 14:00 respectively), the Rating level is 53 dB below background. This results in no impact likely, depending on context according to BS4142:2014. This would be considered inaudible at the NSR.
- 6.19 With the garage shutters open, the Rating Level is 27dB below the LA90 Background Level during the weekday hours of operation and 12 dB below during the weekend hours of operation. This is also considered inaudible and results in no impact likely depending on context according to BS4142:2014.
- 6.20 Based on the assessment findings and taking into account the relevant national and local planning policies, the proposed garage use (car repairs and Class 7 MOT) would not harm the amenities of nearby residential occupiers or other uses in accordance with policy 33 of the HDPF.

Neighbour Amenity

- 6.21 Policy 33 of the HDPF states that development shall be required to ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land. The site is situated within an established industrial estate, with the nearest residential dwelling being Paddock Wood which is located over 140 metres to the southeast.
- 6.22 The Noise Impact Assessment carried out by Acoustic South East has demonstrated that the proposal will not be audible to the occupiers of Paddock Wood with the roller door closed or open. All other adjacent units consist of industrial uses in general and light industrial use (B2 and Class E (g)(iii)) with ancillary offices.
- 6.23 Therefore, the proposal would not give rise to an unacceptable impact on neighbouring occupiers amenities in terms of overlooking, loss of privacy, noise or disturbance in accordance with policy 33 of the HDPF.

Parking, Access & Highways

- 6.24 A Transport Statement has been prepared by GTA Civils which accompanies the planning application.
- 6.25 The proposals involve the introduction of vehicle repair, maintenance and Class 7 MOT servicing activities within Unit 2. Coles Automotive plan to operate within units 2 & 3, with the reception, offices and light servicing occurring in unit 3, which already has the required consents.
- 6.26 The site is accessed via the existing industrial estate access from Shoreham Road which was permitted under application DC/20/0049 and assessed as acceptable by West Sussex Highway Authority.
- 6.27 The existing provision of 22 car parking spaces, including 9 electric vehicle charging spaces and 1 disabled parking bay, together with 3 cycle parking spaces and refuse storage facilities, will remain unchanged and is considered sufficient to serve the proposed change of use.
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- 6.28 Trip generation has been assessed using the TRICS database, which indicates that the proposals would generate a negligible level of traffic during peak periods which can be readily accommodated within the surrounding highway network. Accordingly, no further highway impact assessment or mitigation measures are considered necessary. The proposals represent a very minor net increase in trip generation associated with the change of use of Unit 2 (291 sqm) from B8 storage and distribution to B2 general industrial use to include car repairs and MOT Class 7.
- 6.29 Overall, the scale and nature of the development is not considered to result in any material impact on the operation or safety of the surrounding highway network, nor on sustainable transport modes in accordance with paragraph 116 of the NPPF and policies 40 and 41 of the HDPF.

Water Neutrality

- 6.30 On 31st October 2025 Natural England formally withdrew the 2021 Position Statement, citing a package of measures that they were satisfied would safeguard the Arun Valley sites. Principal amongst these measures is a reduction in the Southern Water abstraction licence 'by March 2026'. However, given the licence change has not yet taken place Horsham District Council, as competent authority under the Habitats Regulations, cannot yet be certain that new development will not result in adverse impacts on the Arun Valley sites.
- 6.31 To ensure development can come forward as water neutral in the meantime, the Council has agreed with Natural England to use the significant water savings made by Southern Water in 2024/25 through their programme of leakage reduction (amongst other measures). This has generated some 3,240,000 litres per day of water savings that can now be attributed to new development without increasing water abstraction in the Arun Valley beyond baseline. These savings were previously to be used to launch the Sussex North Water Certification Scheme (SNWCS), however following the withdrawal statement SNWCS will no longer be launching. Natural England standing advice dated 10th November 2025 raises no objection to using these savings to enable development to come forward. The standing advice clarifies that it functions as Natural England's formal response pursuant to Regulation 63(3) of the Conservation of Habitats and Species Regulations 2017 to all relevant planning applications which seek to achieve water neutrality using the above Southern Water savings.
- 6.32 There is no clear or compelling evidence to suggest the nature and scale of the change of use would result in a more intensive occupation of the unit necessitating an increased consumption of water that would result in a significant impact on the Arun Valley SAC, SPA and Ramsar sites, either alone or in combination with other plans and projects.
- 6.33 The grant of planning permission would not therefore adversely affect the integrity of these sites or otherwise conflict with policy 31 of the HDPF, NPPF paragraph 180 and the Council's obligations under the Conservation of Habitats and Species Regulations 2017.

Ecology and BNG

- 6.34 The proposal is for a change of use of an existing unit. Therefore, there is no requirement for protected species surveys.

- 6.35 Biodiversity Net gain is not required for a change of use application. Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) mandates that every development must achieve at least a 10% Biodiversity Net Gain (BNG) (unless the development qualifies as exempt under the Biodiversity Gain Requirements (Exemptions) Regulations 2024).
- 6.36 The development is exempt from the requirement to achieve a minimum 10% BNG due to qualifying as 'de minimis' under Regulation 4 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024.

7.0 Conclusion

- 7.1 At a national level, paragraph 88 of the NPPF enables the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.
 - 7.2 At a local level, policy 10 (Rural Economic Development) encourages sustainable rural economic development and enterprise within the district in order to generate local employment opportunities and economic, social and environmental benefits for local communities. It is considered that the change of use would maintain the quality and character of the area, whilst sustaining its varied and productive social and economic activity in accordance with the policy.
 - 7.3 It is considered that the change of use would be appropriate in this unit due to the fact, the wider site already has a consented B2 use and numerous other industrial units to the east on Henfield Business Park also have B2 uses.
 - 7.4 The use of the unit as an MOT centre and car repair garage would contribute to the wider rural economy, be contained within an existing unit and within the existing boundaries of an established rural industrial estate in accordance with policy 10 of the HDPF and paragraph 88 of the NPPF.
 - 7.5 The proposal would provide additional local employment opportunities and economic, social and environmental benefits for the local community. The business will provide additional jobs for local people and is sustainably located adjacent to two bus stops.
 - 7.6 A Noise Impact Assessment has been undertaken and the results show that the Rating Level generated by the garage with its shutter door closed, when considered at the worst-case noise sensitive receptor (Paddock Wood), is 68 dB below the representative LA90 Background Level. This is during the garage's weekday 07:00 to 20:00 hours of operation.
 - 7.7 For the hours of operation on Saturday and Sunday (07:00 – 18:00 & 09:00 – 14:00 respectively), the Rating level is 53 dB below background. This results in no impact likely, depending on context according to BS4142:2014. This would be considered inaudible at the NSR.
 - 7.8 With the garage shutters open, the Rating Level is 27dB below the LA90 Background Level during the weekday hours of operation and 12 dB below during the weekend hours of operation. This is also considered inaudible and results in no impact likely depending on context according to BS4142:2014. Therefore, there would be no impact on neighbouring occupiers amenities in accordance with policy 33 of the HDPF.
 - 7.9 The site is accessed via the existing industrial estate access from Shoreham Road which was permitted under application DC/20/0049 and assessed as acceptable by West Sussex Highway Authority.
 - 7.10 The existing provision of 22 car parking spaces, including 9 electric vehicle charging spaces and 1 disabled parking bay, together with 3 cycle parking spaces and refuse storage facilities, will remain unchanged and is considered sufficient to serve the proposed change of use.
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- 7.11 Trip generation has been assessed using the TRICS database, which indicates that the proposals would generate a negligible level of traffic during peak periods which can be readily accommodated within the surrounding highway network.
- 7.12 The proposals represent a very minor net increase in trip generation associated with the change of use of Unit 2 (291 sqm) from B8 storage and distribution to B2 general industrial use to include car repairs and MOT Class 7.
- 7.13 The scale and nature of the change of use is not considered to result in any material impact on the operation or safety of the surrounding highway network, nor on sustainable transport modes in accordance with paragraph 116 of the NPPF and policies 40 and 41 of the HDPF.
- 7.14 There is no clear or compelling evidence to suggest the nature and scale of the change of use would result in a more intensive occupation of the unit necessitating an increased consumption of water that would result in a significant impact on the Arun Valley SAC, SPA and Ramsar sites, either alone or in combination with other plans and projects.
- 7.15 The proposal is for a change of use with no alterations to the building or site proposed and therefore no ecology surveys are required.
- 7.16 The development is exempt from the requirement to achieve a minimum 10% BNG due to qualifying as 'de minimis' under Regulation 4 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024.
- 7.17 Therefore, this application is submitted to you for your favourable consideration.