

Friday, 13 March 2026

Objection to Application DC/26/0143

Site Address: Martha's Barn, Wheatsheaf Road, Henfield, West Sussex, BN5 9AX

Description: Erection of 3 buildings (D, E & F), reposition PD Building C, provision of a formal parking and turning layout to serve all units along with dedicated internal access to land to the rear, the use of Buildings C, D & E for variable B2 and E(g) use, Building F for variable B2, E(d), and E(g) use and for all Buildings (A, B, C, D, E & F) and all units to be capable of being used independently of each other

Introduction:

I write on behalf of Mr. Joe Furniss, of Hollinger, Wheatsheaf Road, Henfield, West Sussex, BN5 9AX to object to planning application DC/26/0143 for the above development at Marthas Barn Business Park, Wheatsheaf Road, Henfield.

The proposal seeks to introduce substantial additional built form and a formalised internal layout to create a multi-unit commercial estate with flexible industrial and Class E uses, each unit capable of independent occupation. The site lies in open countryside, outside the settlement boundary.

This application repeats, in materially expanded form, the same fundamental planning failures that led to two recent refusals by Horsham District Council, both of which were upheld by a Planning Inspector on appeal in April 2025. The Inspector's conclusions are unambiguous, site-specific, and directly applicable to this proposal. The Council is respectfully urged to give them full weight.

This objection identifies four principal grounds for refusal:

- Conflict with development plan countryside protection policy (HDPF Policy 26 and Henfield NDP Policy 3.2)
- Unacceptable landscape and visual harm from southward commercial encroachment into open countryside
- Unjustified reliance on a fallback position that does not support the scale and nature of what is proposed
- Significant residential amenity and highway impacts arising from flexible, independently occupied industrial and commercial uses in a rural location
- Drainage issues due to loss of permeable area on site, which would worsen current flooding issues.
- Concerns relating to BNG approach.

Appeal Decisions:

This application cannot properly be assessed without full and detailed regard to the site's recent planning history. Two applications (DC/22/1790 and DC/23/2311) were refused by Horsham District

Council and subsequently dismissed on appeal by a Planning Inspector on 28 April 2025. That decision must be treated as highly material to the determination of the present application.

The Inspector's findings were precise, reasoned, site-specific conclusions about this location, this commercial use, and the harm caused by southward encroachment beyond the established commercial envelope. They were reached after a full consideration of the planning balance, including the economic benefits advanced by the appellant. Those benefits were found to be insufficient to outweigh the identified landscape harm. There is nothing in the current application that changes that, and in important respects, the current scheme goes further than the dismissed proposals.

On the question of the lawful commercial use, the Inspector described it as tightly controlled through conditions. Those conditions restrict the use to a specific business activity, impose limits on external storage and lighting, and prevent the introduction of new independent uses within the site. This framework of control is the reason the existing development is considered to relate acceptably to its rural surroundings. The Inspector was unambiguous that these controls define the acceptable envelope of activity at the site.

On the question of the appropriate commercial curtilage, the Inspector identified a limited southward extent.. The Inspector found that the approved commercial envelope works well in its setting specifically because it is compact, farmyard-like in character, and does not project beyond the line of the adjacent residential properties into the open field to the south. That spatial finding is central to everything that follows, because the current proposal extends commercial built form and operational activity southward beyond that envelope.

The Inspector found that extending hardstanding and commercial activity into the rural grassland constituted urbanising encroachment into the surrounding patchwork of fields, eroding the intrinsic landscape character of the countryside. That finding was decisive. This establishes a clear and recent site-specific judgement that must shape how this application is assessed. The current proposal does not engage with or respond to that judgement. It simply presents a larger and more ambitious version of the same expansion that has already been found harmful.

Discussion of Scheme:

Fallback Position:

A central issue in this application is the weight to be given to the fallback position identified by the applicant. DC/25/0887 confirmed as lawful the erection of a new B8 building and associated hard surface works. The Design and Access Statement relies on that certificate as justification for the current proposals, noting that at least some hardstanding has already been provided.

The confirmed fallback is a single additional B8 building with associated hard standing. It does not include multiple buildings. It does not include multiple independently occupied units. It does not include flexible general industrial B2 uses or the range of Class E activities sought in this application. It does not authorise the formalised internal estate layout, the courtyard arrangement, or the market-led subdivision model described in the applicant's own Design and Access Statement. The fallback must be assessed for what it actually is, not inflated into a permission for something materially broader.

The planning and environmental consequences of the two positions are not comparable in scale, intensity, or character. The Design and Access Statement makes explicit what the applicant intends: to offer small units for rent on flexible terms, with internal subdivision dictated by market demand,

and with all units capable of being let and occupied independently of one another. This approach brings with it a categorically different level of activity, a greater number of operational presences on the site, a more complex and unpredictable pattern of vehicle movements, and a higher and more varied demand for lighting, servicing, waste management, and external infrastructure. The fallback provides no meaningful justification for any of these consequences.

For these reasons, the fallback position identified under DC/25/0887 carries limited weight in the determination of this application. It establishes that one additional B8 building with associated hardstanding would be lawful, but it cannot be read as endorsing, or reducing the planning harm of, the significantly more intensive and complex development now proposed. Where the applicant seeks to rely on the fallback to minimise the weight accorded to material concerns, including impacts on amenity, highway safety, the character of the area, and the natural environment, that reliance should be rejected. The application must be assessed on its own merits, against the development plan and all other material considerations, without the fallback position distorting that exercise. On that basis, and for all the reasons set out in this representation, the application should be refused.

Principle of Development:

Before considering the detailed impacts of the proposal, it is necessary to address its acceptability in principle. The site lies outside any built-up area boundary and within open countryside.

Policy 26 of the Horsham District Planning Framework establishes that outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. The policy sets out a series of cumulative requirements that any proposal in the countryside must satisfy. It must be essential to a countryside location. It must meet one of the specified countryside criteria (supporting agriculture or forestry, enabling extraction or waste disposal, providing quiet informal recreation, or enabling the sustainable development of rural areas in a manner that cannot be provided elsewhere). It must remain at a scale appropriate to its countryside character. It must avoid significant increases in activity. And it must protect or enhance the key landscape character features of the area in which it is located, including the development pattern, historical and ecological qualities, tranquillity, and sensitivity to change.

This proposal fails on those requirements. The development is not essential to a countryside location. The commercial activities proposed are not activities that require or are tied to a rural setting. They could be delivered from any established employment location. The applicant has provided no credible justification for why this countryside site, as opposed to an allocated employment site, is necessary for the proposed uses, and no such justification exists. A commercial estate built on the premise that a rural road location offers convenient access and lower land costs is not a countryside-essential proposal; it is an urban-type use seeking to exploit a rural location.

The proposal also fails the requirement to avoid significant increases in activity. The Inspector's April 2025 decision found that even the modest hardstanding and operational changes proposed in the dismissed appeals generated an unacceptable intensification of commercial activity in this location. The current proposal goes considerably further, introducing multiple additional buildings, independent occupation across several units, and a flexible industrial and commercial use profile that would generate a materially greater volume and variety of activity than anything previously permitted or considered at this site. The contrast with the tightly conditioned, business-specific use that the Inspector described as acceptable could not be more stark.

The proposal also fails to protect or enhance landscape character. This is not a disputed conclusion, it is the site-specific finding of the April 2025 appeal decision, which concluded that commercial

expansion at this location causes substantial harm to the intrinsic character of the countryside. The Policy 26 tests are not met, and the application should be refused on that basis alone.

Policy 3.2 of the Henfield Neighbourhood Development Plan provides an additional and locally specific layer of policy control. Outside the built-up area, the policy supports new or intensified employment uses only where they can be accommodated within the curtilage of an existing employment site, and only where traffic, parking, design, and screening criteria are satisfied.

The proposal fails the curtilage requirement. The Inspector's April 2025 decision defines the acceptable commercial curtilage at this site with precision, aligning it with the rear wall of Hollinger and finding that the open grassland to the south falls outside that curtilage.

The proposal also fails the design and screening criteria. Policy 3.2 requires that employment development outside the built-up area is designed and screened so as to minimise visual impacts on local amenity. A multi-building commercial estate with independently occupied units, flexible industrial use, and an internal layout designed for market-led subdivision cannot be designed or screened into compliance with those criteria. The urbanising character of the proposal is inherent in what is being proposed, not a matter that can be addressed through conditions or landscaping.

For all of these reasons, the application must be refused. It fails to satisfy the fundamental policy tests that govern development in the open countryside. It does not meet the cumulative requirements of Policy 26 of the Horsham District Planning Framework, which are not aspirational benchmarks to be weighed in the balance but essential thresholds that any countryside proposal must clear. It fails the curtilage and design requirements of Policy 3.2 of the Henfield Neighbourhood Development Plan. And it conflicts directly with the conclusions of the Inspector's April 2025 decision, which addressed this specific site, in this specific policy context, and found that commercial intensification of this kind causes unacceptable harm.

No material consideration exists that would justify setting aside that policy framework or departing from the Inspector's findings. The proposal is not a marginal or borderline case. It is a commercial estate in open countryside that fails on principle, fails in detail, and represents a significant escalation beyond anything that has previously been considered or refused at this location. Granting permission would not only be wrong in this instance; it would fundamentally undermine the integrity of the policy protections that exist to preserve the rural character of this area.

National Policy

The National Planning Policy Framework acknowledges the importance of a prosperous rural economy and recognises that business sites may sometimes be found beyond settlement boundaries. That acknowledgement does not, however, provide a general permission for open countryside development wherever an economic benefit can be identified. The NPPF is clear that development in rural locations must be sensitive to its surroundings, must not have an unacceptable impact on local roads, and should make use of physically well-related and previously developed sites where available. These are qualifying conditions, not optional considerations.

In this case, the development plan tests are not met. The proposal is not sensitive to its countryside surroundings; the Inspector has found that lesser development causes substantial harm to landscape character. It raises unresolved concerns about traffic generation on a constrained rural road. And it does not make use of a well-related or previously developed site, it extends into open grassland that the Inspector has already found to lie outside the acceptable commercial envelope. The NPPF's support for rural economic activity cannot override a clear, up-to-date, and site-specific conflict with

adopted local and neighbourhood plan policy. The principle of this development is unacceptable, and no amount of detailed design work or mitigation can resolve that fundamental position.

Landscape and Visual Harm:

Landscape character and visual impact remain the central and decisive planning harm in this case. The Inspector's April 2025 decision makes that absolutely clear, and nothing in the current application resolves, mitigates, or meaningfully engages with the identified harm. On the contrary, the current proposal intensifies it.

The Inspector described the lawful commercial form at this site as compact and farmyard-like in arrangement, limited in its southward extent, and acceptable in its rural context precisely because of those qualities of restraint and containment. The existing built form works within the landscape because it does not project beyond the line of the adjacent residential properties into the open grassland to the south. That relationship between the compact commercial cluster and the open rural field beyond is what the Inspector described as a settled and appropriate character. The current proposal dismantles that relationship entirely.

By introducing further built mass across a formalised estate arrangement, the proposal repeats the urbanising encroachment that the Inspector condemned. A business park in an open countryside location, however well landscaped at its perimeter, represents a qualitative change in the character of the site and its surroundings that cannot be resolved through boundary treatment or planting schemes.

The operational consequences of the proposed estate model compound the physical harm. Even compared with the confirmed fallback of a single B8 building, a multi-building scheme with independently occupied units will generate a materially greater intensity of activity: more vehicles arriving and departing throughout the day, more servicing and delivery movements, more lighting required to secure and operate independent premises, more external storage and waste infrastructure, and a more varied and less predictable daily activity profile. All of these effects directly engage Policy 26's requirement that development in the countryside avoids significant increases in activity and conserves the key landscape characteristics of tranquillity and sensitivity to change.

There is also a cumulative dimension to the landscape concern that the Council must not overlook. The Inspector's April 2025 decision records that, in the period preceding the dismissed appeals, there had been observed unauthorised commercial encroachment on and adjacent to the site, including car sales activity and external storage beyond the appeal site boundary. That history illustrates a pattern of incremental commercial pressure at this location, and it is directly relevant to how further expansion should be assessed. The current application, rather than providing that firm basis, proposes to expand the site significantly and to introduce a model of occupation and use that would make future control and enforcement materially more difficult.

The Inspector's April 2025 decision was not an invitation to resubmit with cosmetic amendments. It was a considered finding that this site cannot accommodate the scale, form, and operational character of development now proposed without causing serious harm to landscape character. That finding applies here, and in several material respects the current proposal makes the position worse.

The relevant policy framework is clear, the Inspector's analysis is directly applicable, and the proposal fails to engage with either in any meaningful way. What is being assessed is, in substance, the same development that was refused, repackaged within a slightly different parameter set and

accompanied by the same unsatisfactory reliance on landscaping to mask rather than resolve the underlying harm.

Refusal is the only outcome consistent with the Inspector's findings, with the development plan, and with the Council's duty to protect a countryside location that has already been subjected to sustained and partially unauthorised commercial encroachment.

Residential Amenity:

The residential amenity implications of this proposal are substantial and go significantly beyond the theoretical risk of harm. The impacts described in this section are grounded in observed conditions at this site over recent years, and in the evidence of what commercial activity of the kind proposed generates in practice in close proximity to residential properties. The adjacent dwellings at Hollinger and Green Oaks Barn are particularly and directly affected, and the living conditions of its occupiers must be given significant weight in the determination of this application.

Paragraph 135 of the NPPF requires that planning decisions deliver places with a high standard of amenity for existing and future users. Policy 32 of the Horsham District Planning Framework requires that development is designed to avoid unacceptable harm to the amenity of occupiers of nearby property through noise, overlooking, and other impacts. Policy 3.2 of the Henfield Neighbourhood Development Plan requires that the design, materials, massing, position, and landscaping of any employment development minimises impacts on local amenity. The proposed scheme fails to satisfy these requirements.

The progressive intensification of activity at this site over recent years has been accompanied by the clearance of vegetation and natural screening that previously provided a degree of separation between the commercial activity and the neighbouring residential properties. Where natural boundary treatment once softened the relationship between the site and neighbouring dwellings,, that buffer has been substantially reduced. The proposed development does not restore it. The Design and Access Statement proposes new boundary treatment and landscaping at the southern and western edges of the extended commercial area, but this is perimeter planting for a materially expanded development envelope. It does not address the closer, more immediate interface between the existing and proposed built form and the neighbouring residential curtilages to the east. The result is that the occupiers of these dwellings would find themselves in closer proximity to a more intensive, more varied, and less controllable pattern of commercial activity than has ever been permitted at this site, with less natural screening than existed before the site's commercial use began to expand.

The noise and disturbance implications of the proposed development are severe and must be assessed against the full range of uses that flexible B2 general industrial and Class E permissions would enable. B2 general industrial use is not a quiet neighbour. It encompasses manufacturing, fabrication, processing, and the use of power tools, lifting equipment, extraction systems, and mechanical plant. Each independently occupied unit would introduce its own operational noise profile, its own hours of activity, and its own pattern of disturbance, and those profiles would overlap and compound one another in a way that single-occupier management cannot replicate and planning conditions cannot easily control.

The experience of nearby residents in connection with previous uses at this site is instructive and should not be set aside. Past commercial operations generated significant noise and disturbance from HGV deliveries, reversing vehicles, the movement of heavy loads, and general site activity audible from the residential properties immediately to the east. The sudden and impulsive character

of much of that noise the engagement of reversing alarms, the impact of vehicle ramps, the starting of engines is particularly intrusive in a rural setting where background noise levels are low and where such sounds carry clearly. General industrial activity, by its nature, generates a similar and in many respects greater range of such noise. The occupiers of Hollinger and Green Oaks Barn are at immediate risk of this impact, and the proposed scheme offers no adequate or enforceable mitigation.

The problem is compounded by the proposed model of independent occupation. In a multi-unit estate where each tenant manages their own operations, there is no single responsible party capable of managing the cumulative noise environment of the whole site. One unit may operate early morning shift patterns while another receives deliveries in the evening. One tenant's extraction equipment may run continuously while another conducts intermittent heavy work. The interaction of those separate activity patterns is not addressed in the application, and it cannot be resolved by a standard noise condition attached to the overall permission.

A multi-unit commercial estate generates significantly greater volumes of deliveries, servicing visits, waste collections, and courier movements than a single-occupier use. The Transport Statement's emphasis on HGV turning provision and the ability for vehicles to leave the site in forward gear confirms that heavier vehicle movements form a material and anticipated part of the operational reality of this scheme. Every independently occupied unit introduces a separate logistics relationship, and the cumulative effect of those separate relationships on an unlit rural road and in close proximity to residential properties is a significant ongoing amenity impact.

The internal road layout proposed to serve the estate, HGV turning area would direct servicing and delivery vehicles in close proximity to the boundary shared with Green Oaks Barn. HGV movements on that route, including engine noise, air brakes, reversing manoeuvres, and the noise of loading and unloading would be experienced directly by neighbouring occupiers of that property. The servicing and delivery activity associated with previous commercial operations at this site has already generated amenity harm of this kind, and the proposed scheme would intensify rather than reduce it.

The appeal decision records that lighting and floodlighting restrictions were a central feature of the historic planning conditions framework at this site, and that those restrictions were imposed specifically because of the site's rural setting and its relationship with neighbouring residential properties and the wider countryside. The proposed development fundamentally changes the lighting demand profile of the site. An estate of independently occupied units generates security lighting requirements, operational lighting for extended hours across multiple premises, and external illumination of delivery and servicing areas, all operating simultaneously and to different schedules.

The residential amenity impact of the proposed commercial estate must be assessed cumulatively and in the context of the wider development intentions for this landholding. The Design and Access Statement refers to a pending application connected with a small caravan and tent pitch arrangement via The Caravan and Motorhome Club, to be served by a dedicated access route along the western boundary. This introduces a further independent source of visitor movements, overnight occupancy, and associated activity immediately adjacent to the site. The cumulative amenity effects of a multi-unit commercial estate, taken together with an additional visitor accommodation use and the access movements that both generate, have not been adequately addressed in the application and require explicit assessment. The Council must consider the totality of what is being put forward for this landholding, not each element in isolation.

The policy framework is clear. High standards of amenity for existing residents are not a material consideration to be weighed and balanced away. They are a requirement. The evidence from this site's recent history, the operational characteristics of the use class sought, the multi-occupier model proposed, and the cumulative context of the wider development intentions for this landholding all point in the same direction. The harm to residential amenity would be real, ongoing, and unmitigable.

Highways and Sustainability:

The Transport Statement honestly sets out the access constraints of this location: the site is accessed from a rural section of Wheatsheaf Road subject to a 60 mph speed limit, with no footways, no cycle infrastructure, and no realistic pedestrian connection to any settlement. The nearest bus stops are approximately 1.75 kilometres from the site, and the nearest rail station is several kilometres away. These are not minor or incidental limitations. They establish that this is a location entirely dependent on private vehicle use, and that this dependency cannot be reduced by any realistic operational or mitigation measure. Every employee, every visitor, and every commercial operator will arrive by motor vehicle.

That context makes the modelled trip generation figures all the more significant. The Transport Statement identifies 298 two-way vehicle movements per day as the predicted output of this development. On a rural road with a 60 mph speed limit, no footways, and no alternative means of access, that volume of motor traffic is substantial. It represents a vehicle movement approximately every three minutes across a standard working day, concentrated on a road that was not designed to accommodate commercial traffic at that frequency. The cumulative effect on highway safety, on the character of the rural road, and on neighbouring amenity deserves direct and serious assessment, not treatment as an acceptable baseline assumption.

A multi-unit estate with separate occupiers creates a cumulative and non-linear trip generation profile that is difficult to model reliably against single-occupier assumptions. When multiple businesses operate from separate units on the same estate but manage their own logistics, deliveries, staffing, and visitor arrangements independently, the result is a more complex and less predictable pattern of vehicle movements than a single integrated operation would produce. The Transport Statement does not adequately account for this dynamic.

There are also concerns relating to the capacity built into the scheme by the applicant. The Design and Access Statement describes deliberate over-provision of parking on a belt and braces basis, and identifies capacity for potential first floor or mezzanine-type additional floorspace within the proposed buildings. Headroom built into the scheme in this way creates scope for intensification of occupation and vehicle movements beyond the headline assumptions used in the Transport Statement, and the officer report should address what controls would prevent that intensification from occurring.

Taken together, these concerns point to a development whose transport impacts have not been adequately assessed and cannot be adequately mitigated. The access constraints are not technical details to be resolved at reserved matters stage or managed through a travel plan condition: they are fundamental characteristics of the site that make it unsuitable for a multi-unit commercial estate of this scale. The modelled trip generation figures, even on their own terms, represent a significant intensification of motor traffic on a rural road that offers no alternative means of access for any user. The multi-occupier nature of the scheme makes those figures uncertain and likely to be an underestimate, and the headroom deliberately built into the design means that the figures

presented today may bear little relation to the traffic generated once the estate is fully occupied and intensified.

Flood Risk and Drainage:

The proposed development gives rise to a serious and well-evidenced surface water drainage concern that the application has not adequately addressed. The existing hardstanding that has been laid at this site has already been shown to generate surface water run-off that discharges into the rear gardens of neighbouring residential properties, including the garden of Hollinger. That harm is occurring now, before any further development has been carried out. The current proposal involves a further substantial increase in impermeable surface area across the extended commercial envelope, and in the absence of adequate sustainable drainage infrastructure, the harm will be significantly worsened.

Photograph of Hollinger's Garden Following Hardstanding:



Photograph of Existing Hardstanding Drainage Issues:



Paragraph 181 of the National Planning Policy Framework is unambiguous: when determining planning applications, local planning authorities must ensure that flood risk is not increased elsewhere. The applicant has not discharged that requirement. The application does not contain a surface water drainage strategy that adequately demonstrates how the additional impermeable surface will be managed, and it does not address the existing condition in which run-off from the site is already affecting neighbouring properties.

Policy 38 of the Horsham District Planning Framework reinforces the national position. Where there is the potential to increase flood risk, proposals must incorporate sustainable drainage systems where technically feasible, or must incorporate water management measures that reduce the risk of flooding and ensure flood risk is not increased elsewhere. The site sits within Flood Zone 1, and it is not suggested that the development gives rise to fluvial flood risk. However, Flood Zone 1 designation does not mean that surface water drainage is without consequence. The loss of permeable ground to hardstanding is a straightforward and well-understood mechanism by which surface water run-off is generated and flood risk transferred to neighbouring land. The progressive

laying of hardstanding at this site has already demonstrated that mechanism in practice, and the evidence of run-off entering neighbouring residential gardens is the direct result.

The scale of additional impermeable surface proposed in this scheme is considerable. The application introduces new hardstanding across the extended commercial envelope to serve the proposed buildings, internal estate roads, parking areas, and servicing areas. The cumulative impermeable surface area, taken together with what has already been laid, represents a substantial reduction in the natural soakaway capacity of the land. Prior to the commencement of commercial development at this site, the land to the south and west was open grassland capable of absorbing rainfall at a natural rate. That capacity has been progressively eliminated by the hardstanding that has been installed, and the current application proposes to eliminate what remains of it within the extended commercial envelope.

That concern is compounded by a fundamental deficiency in the application documents themselves: the submission contains no drainage information whatsoever. There is no drainage strategy, no surface water management plan, no calculations of run-off rates or volumes, no identification of attenuation measures, and no assessment of the impact of the proposed development on neighbouring or downstream land. For a development of this scale, on a site where surface water run-off is already causing demonstrable harm to neighbouring properties, that omission is a serious one. It is not possible for the Council, or for any consultee, to assess whether the proposed drainage arrangements are adequate, because no drainage arrangements have been proposed or described.

The applicant has not demonstrated, through any adequate technical evidence, that the proposed development can be drained without increasing surface water run-off to neighbouring properties. A Sustainable Drainage Strategy prepared in accordance with the relevant technical standards addressing the volume of surface water generated, the rate of run-off, the attenuation measures proposed, and the impact on neighbouring land should be required before this application can properly be assessed. In the absence of that evidence, the Council cannot satisfy itself that Policy 38 of the HDPF and Paragraph 167 of the NPPF have been met, and the application should be refused on that ground. The existing harm to neighbouring properties from surface water run-off is a material consideration in its own right, and it must weigh heavily in the planning balance.

Biodiversity Net Gain:

The applicant's Biodiversity Net Gain assessment confirms that the proposed development will result in a net loss of 0.91 habitat units; a reduction of 52.63% against the baseline. To meet the mandatory 10% net gain required under the Environment Act 2021, the applicant proposes simply to purchase 1.08 offsite habitat units. This approach is wrong in principle.

The statutory BNG framework is built around a mitigation hierarchy: avoid harm, mitigate what cannot be avoided, and only then compensate for residual losses through offsite provision where onsite solutions have genuinely been exhausted. Offsite credits are a last resort, not a first response. The application does not engage with that hierarchy. The only onsite provision proposed is 98.15 square metres of shrub planting, less than 2.5% of the site area.

A 52.63% net loss is particularly serious on an open countryside site. The grassland being converted to hardstanding supports a characteristic species assemblage that represents real ecological value.

The Council is requested to require a revised BNG assessment that genuinely explores onsite enhancement before offsite credits are relied upon, and that provides full details of any proposed

offsite provision. Until that assessment is submitted and found adequate, planning permission should not be granted.

Conclusion:

This application fails on every ground examined in this objection. It conflicts with the countryside protection policies of the Horsham District Planning Framework and the Henfield Neighbourhood Development Plan. It repeats, in materially expanded form, the same fundamental planning failures that led to two refusals and two dismissed appeals, and it does so without engaging with or responding to the Inspector's site-specific findings. It generates unacceptable landscape harm, serious residential amenity impacts, and unresolved highway concerns on a rural road entirely unsuited to the traffic volumes proposed. It has been submitted without any drainage strategy, despite evidence that the existing hardstanding is already causing surface water harm to neighbouring properties. And it relies on a biodiversity net gain approach that circumvents the statutory mitigation hierarchy rather than complying with it.

Taken individually, any one of these grounds would justify refusal. Taken together, they present an overwhelming and comprehensive case against this proposal. The Council is respectfully urged to refuse planning permission without delay.