

Land adjacent to Unit 12 -
Tesla Engineering Ltd, Water Lane,
Storrington

Planning Statement

(including Needs and Alternatives Assessment)

DHA/33436

March 2025



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1 INTRODUCTION

1.1 APPLICATION OVERVIEW

- 1.1.1 This Planning Statement has been prepared by DHA Planning in support of an application seeking full planning permission on behalf of Tesla Engineering Ltd for the construction of an industrial building extension to Unit 12 with associated parking and ancillary works on land adjacent to Unit 12 Tesla Engineering, Water Lane, Storrington.
- 1.1.2 This Statement is intended to be read in conjunction with the documents and drawings detailed in Table 1.1 (overleaf) submitted in support of the planning application.
- 1.1.3 This Statement considers the merits of the proposal in relation to relevant local and national planning policy and other relevant material considerations.

1.2 PROPOSED DEVELOPMENT

- 1.2.1 The application seeks full planning permission for the construction of an extension to Unit 12, to comprise a new unit ('Unit 12A') sited on an area of open hardstanding, with associated parking and ancillary works, to include an exterior canopy to facilitate the management of deliveries and product and waste movements to and from the building.
- 1.2.2 The new extension will provide an additional 1,294sqm of commercial floorspace and is intended to provide a new machine room, relocated from Unit 4, to facilitate incoming larger and more sophisticated machines, which are necessary as manufacturing requirements continue to become increasingly complex in a rapidly developing high-technology industry.

1.3 THE APPLICANT

- 1.3.1 Tesla Engineering Ltd manufactures resistive and superconducting electromagnets for particle accelerators of all types and produces specialised gradient coils for magnetic resonance imaging (MRI) scanners. Tesla also supplies electromagnets for emerging applications, such as fusion research and the semiconductor industry.
- 1.3.2 The company has been designing and building accelerator magnets since 1973, and their staff are among the most experienced magnet designers and builders in the world.
- 1.3.3 The success of the business meant that in 2012 Tesla secured permission to construct a new 25,000sqft industrial building (unit 9) immediately south of the proposed site in addition to their existing facility on Water Lane Industrial Park.
- 1.3.4 The company had a turnover of £19 million in 2011 and since securing permission for Unit 9 in 2012, the business has continued to develop and grow with turnover in excess of £31 million for the year up to January 2017. At that point, it again

became necessary to create further space in order to increase production and take advantage of the ongoing uplift in demand.

- 1.3.5 Permission was subsequently granted in November 2017 for the erection of two industrial buildings (now referred to as Unit 11 and Unit 12) totalling 4,729sqm. Both units have now been constructed, with Unit 12 recently completed. The continued expansion has now seen turnover exceed £59 million in the year up to February 2024 and the company now employs a further 158 people.
- 1.3.6 Rapid developments in the industry have necessitated a demand for additional and more specialist equipment which has generated a need for a new machine room, capable of accommodating larger and more sophisticated machines in order to remain competitive in this highly specialist market. A new facility, which is intended to operate alongside the recently constructed Unit 12, will transfer existing operations and equipment from Unit 4, which will be re-purposed for additional machine capacity.
- 1.3.7 Tesla Engineering is a socially inclusive employer, offering a wide spectrum of positions suiting a variety of skill levels and abilities. Approximately 452 people are employed at their existing facilities at Water Lane, of which machine operatives comprise some of the most highly skilled and highly paid in the workforce. Many of Tesla's employees live in Storrington and approximately 80% of staff live within 15 miles of the existing facility.

1.4 DOCUMENT STRUCTURE

- 1.4.1 This Statement provides an overview of the application site and proposals. It assesses the planning merits of the scheme, having regard to the relevant planning history and the applicable planning policy framework. It concludes that the proposal is appropriate in planning terms and accordingly requests that planning permission be granted.
- 1.4.2 Section 2 of this statement sets out the context of the site and immediate surroundings, including the site history.
- 1.4.3 Sections 3 and 4 have regard to the proposal and planning policy context by which the application will be considered respectively.
- 1.4.4 Sections 5 and 6 undertake a Needs and Alternatives Assessment and consider the principle of development and other relevant planning considerations.
- 1.4.5 Section 7 draws conclusions to justify the suitability of the development.

1.5 SUPPORTING DOCUMENTATION

- 1.5.1 The application is supported by the following documents and plans:

DOCUMENT/REF	TYPE / CONSULTANT
1APP	Application Form (completed online)
CIL Form 1	CIL Questions Form 1

	Reports
DHA/33436	Planning Statement (this Document)
DHA/33674	Design and Access Statement
DHA/33650	Transport Statement
742	Addendum Landscape and Visual Assessment
16185A Rev B	Flood Risk Assessment & Drainage Proposals
416.065957	Air Quality Assessment
AEG6538_RH20	Water Neutrality Statement
13908X	Ground Investigation
	Drawings
DHA_33674_01	Site Location Plan
DHA_33674_02	Existing Context Plan
DHA_33674_03	Existing Site Layout Plan
DHA_33674_04	Proposed Context Plan
DHA_33674_05	Proposed Site Layout Plan
DHA_33674_06	Existing Plans
DHA_33674_07	Proposed Plans
DHA_33674_08	Existing and Proposed Elevations

TABLE 1.1: APPLICATION DOCUMENTS

2 SITE OVERVIEW

2.1 CONTEXT

- 2.1.1 The application site is located on the north-east side of Water Lane, opposite the existing Water Lane Industrial Estate, and part of the same site as Tesla's most recently constructed Units 11 and 12, on the northern edge of the village of Storrington, West Sussex.



FIGURE 2.1: AERIAL OVERVIEW OF APPLICATION SITE (GOOGLE EARTH)
NOTE: IMAGE ALTERED TO SHOW RECENTLY CONSTRUCTED UNIT 12.

- 2.1.2 Since the construction of Unit 11 and Unit 12, the site proposed for Unit 12A comprises open hardstanding and forms an enclosed parcel of land shielded from wider view by the new units. HGV access to the new units and employee access to the new parking area to the rear of Unit 12 passes alongside the site from Water Lane.
- 2.1.3 Access arrangements will be unchanged from the existing situation on site. Access is achieved from the existing priority junction on Water Lane serving the recently constructed Units 10, 11 and 12 and associated parking areas.

2.2 PLANNING DESIGNATIONS

- 2.2.1 The site sits adjacent to the settlement boundary of Storrington, beyond which the land use to the north is predominantly agricultural in nature. There are

established residential areas 250m to the south west and 100m south east of the site, and to the south of the industrial estate. A further residential property exists to the north-west of Water Lane Industrial Estate.

- 2.2.2 A short section of public footpath, around 100m in length, passes along the western boundary of the site, offering a passing glimpsed view of the new units in the context of the wider site.
- 2.2.3 In terms of environmental considerations, the site is located entirely within Flood Zone 1 (least likely zone to flood). A ditch fronting Water Lane, which is culverted under the site access, has been identified as an area subject to surface water flood risk. This is to be expected as the ditch adjacent to Water Lane has been previously enlarged to improve its flow capacity and also provide a safe entrance to the site via a culvert crossing. The surface water flood risk does not however extend into the site from this source, and the access itself is not at risk of flooding.
- 2.2.4 There are otherwise no landscape, ecological or heritage designations affecting the site.

2.3 PLANNING HISTORY

- 2.3.1 In terms of recent planning history, the following relevant planning application have been made on the immediate site:

PLANNING REFERENCE	PROPOSAL	DECISION (DATE)
DC/17/1367	The erection of two new industrial buildings and ancillary storage building with associated parking and landscaping.	Permitted (November 2017)
DC/12/1891	Proposed new industrial building (unit 9) with access, landscaping, parking and ancillary works	Permitted (March 2013)

TABLE 2.1: SUMMARY OF SITE PLANNING HISTORY.

3 PROPOSED DEVELOPMENT

3.1 OVERVIEW

- 3.1.1 Full planning permission is sought for the extension of Unit 12, provision of vehicle parking and associated works.

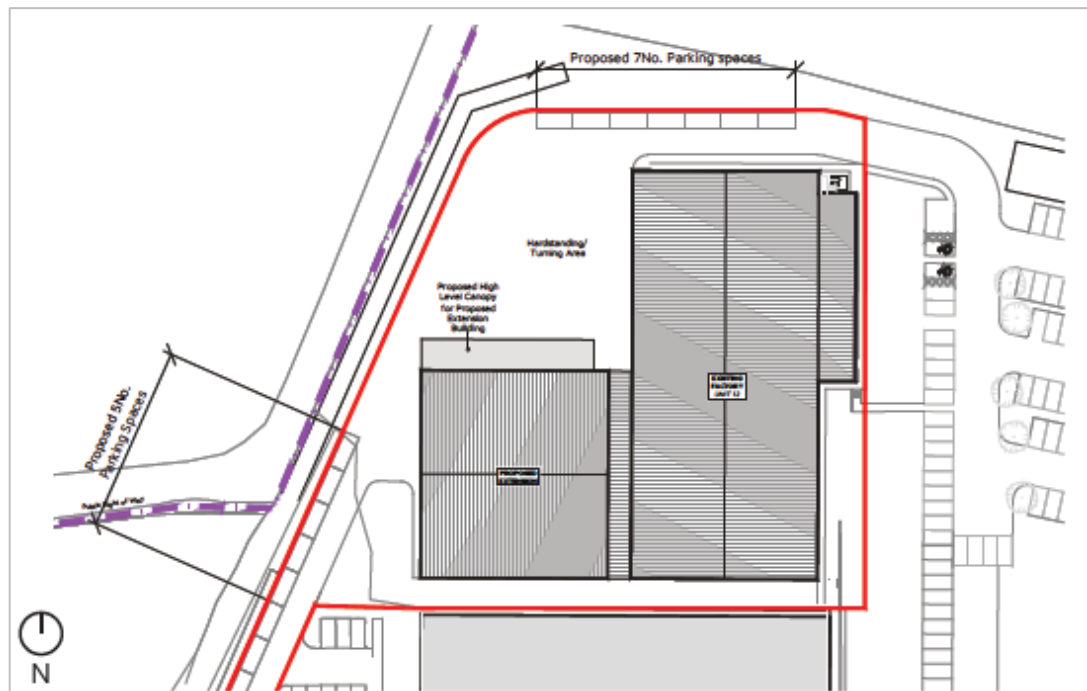


FIGURE 3.1: EXTRACT OF PROPOSED SITE LAYOUT [DHA_33674_05]

- 3.1.2 The extension is to comprise a new unit, termed 'Unit 12A' and will have a close spatial and functional relationship with the company's most modern facilities at Unit 11 and 12. The building will be sited within the L-shaped area enclosed by the new units, which at present comprises an open area of hardstanding.
- 3.1.3 The new extension is intended to provide a new machine room, relocated from Unit 4 to facilitate incoming larger and more sophisticated machines, necessary as manufacturing requirements continue to become increasingly complex in a rapidly developing high-technology industry.
- 3.1.4 From a design perspective, the new unit will provide an additional 1,294sqm of additional commercial floorspace and has been carefully scaled in form and height to sit within the visual envelope of the two adjacent units, minimising the perceptibility of the proposed unit from the site perimeters. In terms of appearance, Unit 12A would be of similar architectural appearance and materiality to Units 11 and 12. Proposed materials will include mute colour brick and dark brown powder coated profile metal sheeting for facade treatment, and goosewing grey powder coated profile metal sheeting for the roof material.
- 3.1.5 The facility would operate 24 hours a day Monday to Friday and 07.00 to 13.00 on Saturdays in line within Unit 11 and 12.

- 3.1.6 The proposals include a canopy structure to the exterior of the north elevation of Unit 12A. An external covered area approximately 4-5 metres wide, provides an area suitable for the siting of industrial waste receptors and items awaiting arrival or departures from the site with minimal increase in built form.
- 3.1.7 For the avoidance of doubt, existing planting will be retained and protected.

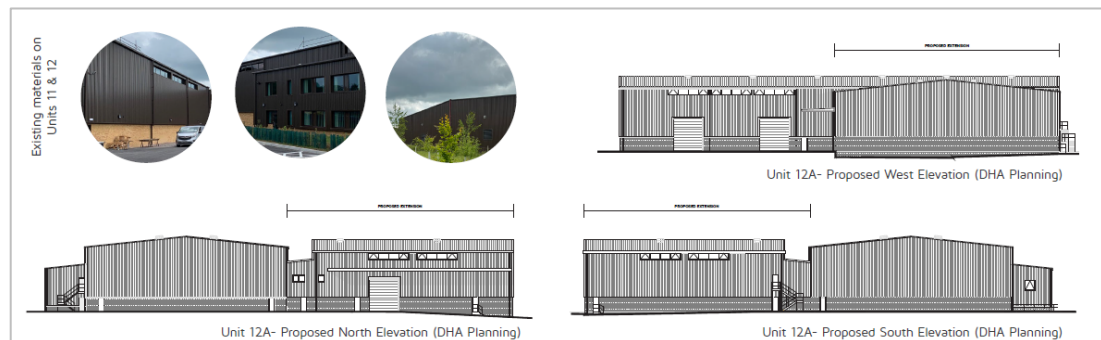


FIGURE 3.2: EXTRACT OF PROPOSED ELEVATIONS AND MATERIAL PALETTE [DHA_33674]

3.2 PRE-APPLICATION DISCUSSIONS AND APPLICANT RESPONSE

- 3.2.1 This application has been informed by pre-application discussions with HDC held in Autumn 2024 under reference 'PE/24/O159' and formal written advice received in a letter dated 3rd October 2024.
- 3.2.2 For ease of reference, a summary of the advice received and the applicant's response is set out below:

Principle of Development

Summary of advice: The site is within a countryside area in policy terms. Policy 26 protects the countryside from inappropriate development unless specific criteria are met, none of which relate to the proposed development. The proposed development is therefore a departure from the Development Plan and the Thakeham Neighbourhood Plan.

However, it is agreed that Policy 7 of the HDPF and the relevant paragraphs of the NPPF are supportive of the expansion of the intensification of existing employment sites. It is agreed that significant weight should be placed on the need to support economic growth through the planning system. Therefore, if the need for the extension is justified and the impacts limited, an exception could be allowed taking into account the economic benefits of the proposal. This could be demonstrated by submitting a Needs and Alternatives Assessment.

The Horsham District Local Plan (HDLP) was submitted for examination in July 2024 and therefore its draft policies carry limited weight, but are still helpful in identifying the intended policy direction. Strategic Policy 30 supports the intensification and expansion of existing employment sites within Key Employment Areas where it creates new jobs and meets specific

criteria. The application site falls within the expanded Water Lane Key Employment Area and could also be considered acceptable under the emerging Local Plan.

Response

- 3.2.3 An updated Needs and Alternatives Assessment is provided within Section 5 of this Statement which demonstrates that the extension is necessary to facilitate future operations of the employment use and no other suitable alternatives exist. A full assessment of the principle of development is set out within Section 6.1 of this Statement.

Design

Summary of advice: No particular concerns are raised in relation to design. It is recommended that matching finishing materials and colours to adjacent units are proposed. Details on how the scale of the building relate to the plant it will house would be helpful.

Response

- 3.2.4 The proposed building design is as submitted at pre-application stage with finishing materials and colours to reflect the adjacent units. The precise details of the plant to be contained within the building is commercially sensitive and will be dependent on future requirements. The proposed plant will however be substantially larger than those which they will replace and the building has been designed to provide sufficient flexibility and future proofing for changing requirements moving forward.

Landscape and Neighbouring Amenity

Summary of advice: It is agreed that Unit 12A would be fully screened from views to the south and east, but there is some potential for views from the north and west, most notably from the Public Footpath and the previous LVIA is recommended to be updated. It is also recommended that previous noise and contamination assessments are referenced and updated as required.

Response

- 3.2.5 An LVIA Addendum and updated Noise Assessment are included within the application submission. Contamination is addressed within Section 6 of this Statement.

Highways, Traffic and Access

Summary of advice: No concerns are raised with regard to parking and access, subject to the submission of updated tracking and parking space details in relation to WSCC Parking Guidance.

Response

- 3.2.6 Tracking plans for HGV turning and details of policy compliant vehicle parking and sufficient existing cycle spaces are included within the application submission.

Ecology, Biodiversity and Trees

Summary of advice: It is agreed that provided the proposed development does not impact on any existing trees' RPA, there would be no impact to existing biodiversity as a result of the proposal as it would be located on existing hardstanding. Therefore, the total habitat impacted on-site would meet the Biodiversity Gain Requirements (Exemptions) and would be considered to be de minimis. Accordingly, BNG would not be required for this proposal.

Response

- 3.2.7 It is confirmed that the proposed development is contained entirely upon existing hardstanding and there would be no impact on ecology as a result. A BNG exemption under 'de-minimis' development has been sought.

Water Neutrality

Summary of advice: It is confirmed that the application site falls within the Sussex North Water Supply Zone as defined by Natural England which draws its water supply from groundwater abstraction at Hardham and water neutrality will therefore be required to be demonstrated.

Response

- 3.2.8 A detailed Water Neutrality Statement is included within the application submission which demonstrates that water neutrality can be achieved by off-setting water efficiency savings within the applicant's wider landownership.

Flood Risk and Sequential Test

Summary of advice: Given the proposed development constitutes major development, a detailed flood risk assessment and drainage statement will be required. A section of the site appears to be located within an area of high-medium risk of surface water flooding according to EA mapping and a sequential test would be required.

Response

- 3.2.9 A detailed flood risk assessment and drainage statement has been submitted which demonstrates that the proposed development is not at risk of flooding when considered from all sources and a sequential assessment is not therefore required.

Air Quality

Summary of advice: An Air Quality Assessment would be required for the proposed development which should outline proposed mitigation measures for the proposed development during construction and operation and in relation to the Storrington Air Quality Management Area.

Response

- 3.2.10 An Air Quality Assessment has been provided within the application submission.

Summary

- 3.2.11 Overall, the pre-application advice confirmed that an argument can be made for the principle of development, and subject to some additional detail at submission stage particularly in regard to flood risk, there are no particular concerns.
- 3.2.12 The wider pre-application advice has informed the degree of supporting documentation provided with the application.

4 PLANNING POLICY CONTEXT

4.1 OVERVIEW

- 4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 4.1.2 For the purposes of this planning application, the development plan comprises policies from the Horsham District Planning Framework (adopted 2015), Site Specific Allocations of Land (adopted 2007) and the Thakeham Parish Neighbourhood Plan to 2031 (made 2017).
- 4.1.3 In addition to the development plan, the Government's Updated National Planning Policy Framework ('NPPF') was updated on 12th December 2024. The NPPF sets out the new Government's requirements and policies for planning in England and must be treated as a material consideration.
- 4.1.4 Other material considerations discussed within this section include the emerging Horsham District Local Plan 2023-2040.
- 4.1.5 This section highlights the parts of the NPPF and development plan that are relevant to this application and the weight that can be given to the existing adopted policies as a precursor to a review of the development plan.

4.2 THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF) (12 DECEMBER 2024)

- 4.2.1 The new Government's latest iteration of the NPPF was published 12 December 2024. The key aspects are as follows.

Achieving Sustainable Development

- 4.2.2 Paragraph 7 states the purpose of the planning system is to contribute to the achievement of sustainable development including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
- 4.2.3 Paragraph 8 states achieving sustainable development means that the planning system has three overarching objectives:
 - a) *an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

- b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

- 4.2.4 These objectives are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).

Decision Making

- 4.2.5 In terms of decision making, paragraph 39 states local planning authorities should approach decisions on proposed development in a positive and creative way.
- 4.2.6 Authorities should use the full range of planning tools available and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Critically, decision-makers at every level should seek to approve applications for sustainable development where possible.
- 4.2.7 Paragraph 40 sets out the benefits of pre-application engagement and front loading stating that early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.

Building a Strong, Competitive Economy

- 4.2.8 Paragraph 85 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.
- 4.2.9 Paragraph 87 goes on to emphasise that planning policies and decisions should recognise and address the specific locational requirements of different sectors and make provision for the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.

- 4.2.10 In rural areas, paragraph 88 states that the sustainable growth and expansion of all types of business in rural areas should be enabled by planning decisions, both through conversion of existing buildings and well-designed, new buildings.

Promoting Sustainable Transport

- 4.2.11 Paragraph 110 directs significant development to locations that are or can be made sustainable. It goes on to recognise that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.
- 4.2.12 Paragraph 116 states that development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

Making Effective Use of Land

- 4.2.13 Section 11 promotes an effective use of land in meeting the needs for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 4.2.14 Paragraph 124 states that planning policies and decisions should (amongst other things) encourage multiple benefits from urban and rural land, taking opportunities to achieve net environmental gains and promote and support the development of underutilised land and buildings.
- 4.2.15 Paragraph 128 states that authorities should take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.

Achieving Well Designed Places

- 4.2.16 Paragraph 131 states the creation of high-quality, beautiful and sustainable buildings and places are fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.
- 4.2.17 Paragraph 135 states planning policies and decisions should ensure that developments:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*

- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

4.2.18 Paragraph 137 states design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should, where applicable, provide sufficient information to demonstrate how their proposals will meet the design expectations set out in local and national policy, and should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.

4.2.19 Paragraph 139 is clear that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, considering any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development. Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).

Conserving and Enhancing the Natural Environment

4.2.20 Paragraph 187 sets out how planning policies and decisions should contribute to and enhance the natural and local environment.

4.2.21 Paragraph 189 is clear that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Habitats and Biodiversity

- 4.2.22 Paragraph 193 says that when determining applications, authorities should apply the principles that if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
- 4.2.23 Equally proposals that conserve or enhance biodiversity to seeking net gains should be supported and encouraged.

4.3 DEVELOPMENT PLAN

Horsham District Planning Framework (2015)

- 4.3.1 Policy 1 'Sustainable Development' states that 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.
- 4.3.2 Policy 2 'Strategic Development' sets out Horsham's spatial strategy for development up to 2031 which seeks to:
- Focus development in and around the key settlement of Horsham, and allow for growth in the rest of the district in accordance with the identified settlement hierarchy.
 - Continue to support in principle the sustainable development of settlements through an appropriate scale of development which retains the existing settlement pattern over the plan period.
 - Manage development around the edges of existing settlements in order to prevent the merging of settlements and to protect the rural character and landscape.
- 4.3.3 Policy 3 'Development Hierarchy' permits development within towns and villages which have defined built-up areas. Infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale to maintain characteristics and function of the settlement.
- 4.3.4 Policy 4 'Settlement Expansion' states that that the growth of settlements across the District will continue to be supported in order to meet identified local housing, employment and community needs. Outside built-up area boundaries, the expansion of settlements will be supported where;
1. The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge.
 2. The level of expansion is appropriate to the scale and function of the settlement type.
 3. The development is demonstrated to meet the identified local housing needs and/or employment needs or will assist the retention and enhancement of community facilities and services.

4. The impact of the development individually or cumulatively does not prejudice comprehensive long term development, in order not to conflict with the development strategy; and
 5. The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced.
- 4.3.5 Policy 6 'Economic Growth' States that sustainable employment development in Horsham district for the period up to 2031 will be achieved by:
1. Allocating land for a high quality business park at Land North of Horsham.
 2. Redevelopment, regeneration, intensification and smart growth of existing employment sites.
 3. The formation and development of small, start-up and move-on businesses, as well as home working and home based businesses, by encouraging provision of small units through development proposals.
 4. Encouraging appropriate workspace and ICT infrastructure, such as high speed broadband, as an integral part of development, including residential development to support flexible working, home working and businesses with the flexibility to operate anywhere.
 5. Retention of Key Employment Areas, for employment uses.
 6. Promotion of the district as an attractive place to stay and visit to increase the value of the tourism economy.
 7. Encouraging sustainable local employment growth through Neighbourhood Development Plans.
 8. Encouraging the expansion of higher education facilities related to research and development and employment training activity.
 9. Identifying additional employment areas to meet the need for appropriate new business activity.
- 4.3.6 Policy 9 'Employment Development' states that the expansion of existing employment sites and premises within the built-up area boundary will be supported where the business requirements cannot be met within the existing site/premises, through acceptable on-site expansion or intensification; and that relocation to existing stock is not preferable.
- 4.3.7 Policy 24 'Environment Protection' requires that developments will be expected to minimise exposure to and the emission of pollutants including noise, odour, air and light pollution and ensure compliance with wider criteria.
- 4.3.8 Policy 25 'The Natural Environment and Landscape Character' seeks to protect, conserve and enhance the landscape and townscape character, taking into account areas identified as being of landscape importance, individual settlement characteristics, and maintain settlement separation.
- 4.3.9 Policy 26 'Countryside Protection' confirms that 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.
- 4.3.10 Policy 31 'Green Infrastructure and Biodiversity' states that development will be supported where it can demonstrate that it maintains or enhances the existing network of green infrastructure and contributes to the enhancement of existing biodiversity.
- 4.3.11 Policy 33 'Development Principles' States that development should prioritise previously developed land, should avoid effects on the amenity of neighbouring occupiers and users, be of a high quality design and respect existing landscape and townscape character.
- 4.3.12 Policy 35 'Climate Change' confirms that development will be supported where it makes a clear contribution to mitigating and adapting to the impacts of climate change by seeking to reduce energy use in construction, improve energy efficiency in new developments, use low carbon energy and locate development in locations that reduce the need to travel and/or are accessible through sustainable means.
- 4.3.13 Policy 36 'Appropriate Energy Use' States that all development will be required to contribute to clean, efficient energy based on the stated hierarchy.
- 4.3.14 Policy 38 'Flooding' requires development proposals to follow a sequential approach to flood risk management, giving priority to development sites with the lowest risk of flooding. All developments over 1 hectare in Flood Zone 1 require a Flood Risk Assessment.
- 4.3.15 Policy 41 'Parking' states that adequate parking and facilities must be provided within developments to meet the needs of anticipated users and that consideration should be given to the needs of cycle parking, motorcycle parking, charging plug-in or other low emission vehicles and the mobility impaired.

Site Specific Allocation of Land (2007)

- 4.3.16 There are no policies in the Site Specific Allocations of Land 2007 of relevance to the proposed development.

Thakeham Neighbourhood Plan

- 4.3.1 The Thakeham Neighbourhood Plan has been through examination and was successful at referendum and was formally 'made' by the District Council on 26 April 2017. The site is not allocated for development in the Neighbourhood Plan.
- 4.3.2 One of the Neighbourhood Plan's aims is to support the local economy through its existing businesses and to encourage expansion of local employment within

settlements.¹ The Plan does not contain any policies relating specifically to employment development outside settlement boundaries, but the Foreword text on page 4 notes that the Parish:

"...wishes to protect and create employment within existing employment sites but acknowledges that, as most workers either commute in or out of the Parish, new employment sites outside of built up area boundaries are unlikely to be sustainable."

4.4 WIDER MATERIAL CONSIDERATIONS

Emerging Horsham District Local Plan 2023-2040

- 4.4.1 Horsham District Council are in the process of preparing a new Local Plan which will replace the current development plan. The emerging Plan was submitted to the Inspector in July 2024 and examination hearings took place in December 2024.
- 4.4.2 On 16th December 2024, the Inspector wrote to the Council following the first week of hearing sessions indicating significant concerns in relation to the soundness and legal compliance of the Plan in a number of areas, and cancelling all further planned hearings. At the time of writing, a further letter from the Inspector is expected in March 2025 at the earliest, which is due to set out further details of the Inspector's concerns, but this has yet to be published.
- 4.4.3 Notwithstanding, the current uncertainty surrounding the future of the emerging Local Plan, the following policies are considered relevant to the proposed development, in particular Policy 30 'Key Employment Areas' which relates directly to the application site.
- 4.4.4 Draft Policy 30 'Enhancing Existing Employment' includes the application site within an expanded Key Employment Area 'Water Lane Trading Estate'. The policy states proposals for the upgrading and refurbishment of existing offices, industrial / business estates, premises and sites will be supported provided that:
- a) they enable the facility to meet modern business standards and demonstrably enhance the attractiveness of the District as a business location;
 - b) they mitigate existing amenity, highway and access issues arising from badly sited uses; and
 - c) potential new impacts on amenity and on the road network are mitigated.
- 4.4.5 The redevelopment, regeneration, intensification and expansion of existing employment premises and sites for employment uses will be supported where it facilitates the retention of existing businesses within the District, and / or protects or creates new jobs, including green industries and social enterprises. Proposals must demonstrate that they meet all the following criteria:

¹ Para 4.3, Aim no. 4

- a) it is in keeping with the existing scale of provision and local area;
- b) the proposal will complement and not prejudice the operation of surrounding employment uses;
- c) it protects the amenity of existing and surrounding uses;
- d) any adverse impacts would not significantly outweigh the benefits; and it is a Key Employment Area or Other Existing Employment Site as defined in this policy.

4.4.6 Wider relevant draft policies are outlined below:

- Strategic Policy 1: Sustainable Development
- Strategic Policy 2: Development Hierarchy Strategic
- Policy 3: Settlement Expansion Strategic
- Policy 6: Climate Change Strategic
- Policy 7: Appropriate Energy Use Strategic
- Policy 8: Sustainable Design and Construction Strategic
- Policy 9: Water Neutrality Strategic
- Policy 10: Flooding Strategic
- Policy 11: Environmental Protection Strategic
- Policy 12: Air Quality Strategic
- Policy 13: The Natural Environment and Landscape Character Strategic
- Policy 14: Countryside Protection Strategic
- Policy 17: Green Infrastructure and Biodiversity
- Policy 19: Development Quality
- Policy 20: Development Principles
- Policy 21: Heritage Assets and Managing Change within the Historic Environment
- Policy 23: Infrastructure Provision
- Policy 24: Sustainable Transport
- Policy 25: Parking Strategic
- Policy 31: Rural Economic Development

5 NEEDS AND ALTERNATIVES ASSESSMENT

5.1 OVERVIEW

- 5.1.1 This Needs and Alternatives Assessment has been prepared for the purpose of demonstrating the need for the proposed extension of Unit 12 and an assessment of the alternatives.
- 5.1.2 This Assessment also sets out the clear and significant social and economic benefits of the proposed development and Tesla Engineering itself as a major employer in the district.
- 5.1.3 It concludes that there are no viable alternatives to the proposed development to achieve the necessary floorspace. The relocation of the entire business to an alternative location outside of the district or the country is confirmed to be feasible, albeit disproportionate in the context of the modest additional floorspace sought.
- 5.1.4 For context, a detailed Needs and Alternatives Assessment was submitted under DC/17/1367 for the creation of Unit 11 and Unit 12 and was accepted by HDC for the commercial development of then greenfield land north of Water Lane.
- 5.1.5 This Assessment has been prepared as a supplementary section to justify the extension of the approved units, which remain within a countryside location for the purposes of planning until such time that any emerging Local Plan is adopted. Draft Policy 30 of the emerging Plan will expand the existing Water Lane Industrial Site Key Employment Area to include Unit 11 and 12 and the application site which, if adopted, would negate the requirement for this Assessment.
- 5.1.6 The Plan has been submitted for examination and the economic policies are supported by robust employment land evidence which justify the logical expansion of the Key Employment Area and provide a clear direction of travel in relation to this employment site within any future emerging Local Plan.

5.2 DEVELOPMENT REQUIREMENTS

- 5.2.1 Tesla Engineering Ltd manufactures resistive and superconducting electromagnets for particle accelerators of all types and produces specialised gradient coils for magnetic resonance imaging (MRI) scanners. Tesla also supplies electromagnets for emerging applications, such as fusion research and the semiconductor industry.
- 5.2.2 The company has been designing and building accelerator magnets since 1973, and their staff are among the most experienced magnet designers and builders in the world.
- 5.2.3 The success of the business meant that in 2012 Tesla sought permission to construct a new 25,000sqft industrial building (unit 9) immediately south of the proposed site in addition to their existing facility on Water Lane Industrial Park.
- 5.2.4 The company had a turnover of £19 million in 2011 and since securing permission for Unit 9 in 2012, the business has continued to develop and grow with turnover

in excess of £31 million for the year up to January 2017. At that point, it again become necessary to create further space in order to increase production and take advantage of the ongoing uplift in demand.

- 5.2.5 Permission was subsequently granted in November 2017 for the erection of two industrial buildings (now referred to as Unit 11 and Unit 12) totalling 4,729sqm. Both units have now been constructed, with Unit 12 recently completed. The continued expansion has now seen turnover exceed £59 million in the year up to February 2024 and employ a further 158 people.
- 5.2.6 Since the submission of the application in 2017, rapid developments in the industry have necessitated a demand for additional and more specialist equipment which has generated a need for a new machine room, capable of accommodating larger and more sophisticated machines. The new machines will preserve the competitiveness of Tesla Engineering in this highly specialist sector and will operate as an extension alongside the operations at Unit 11 and Unit 12.
- 5.2.7 Accordingly, the proposed building 'Unit 12A' addresses a clear operational requirement for an appropriate location in close proximity to the new units and with surrounding yard space and external storage to appropriately operate the building without physical restriction.
- 5.2.8 The new facility will transfer existing operations and equipment from Unit 4, which will be re-purposed for additional machine capacity at peak times.

Locational Requirements

- 5.2.9 It has long-since been the applicant's strong preference to continue to expand and operate the business from the site in Storrington. This is currently achieved by maximising and upgrading the existing floorspace on-site and is reflected in Tesla's considerable recent investment over the last few years in the form of Unit 10, 11 and 12 in addition to wider upgrades of existing premises and facilities.
- 5.2.10 There are imperative logistical reasons why future expansion space needs to be located adjacent to the existing Tesla facilities, a summary of which is provided below:
- **Management** – The facility needs to be located close to the existing complex to ensure effective and efficient managerial control of activities. The directors and other levels of management look after all the company's work and need to be able to supervise it. A split site would make this process impossible, as components for any one contract can be made in two or more factories and management needs to be able to supervise the delivery of the contracts as time-effectively as possible.
 - **Efficiency** – There is a need for the regular movement of staff, materials and components between the new facilities and the existing buildings. Locating the new facilities close to the existing buildings is essential to ensure efficient working practices, functionality and to facilitate internal processes. The transportation of components etc. between two sites in separate locations is costly and inefficient, as well as providing quality control risks. Tesla is under constant pressure to reduce its prices in an

increasingly competitive international market, such that the additional costs would make two separate locations an unviable option.

- **Viability of the Business** – Having one site ensures that the complex remains viable and sustainable in the longer term. The company can be more competitive by being able to operate as efficiently and effectively as possible.
- **Shared Equipment** – Tesla has only one each of certain business-critical machines (including CNC machines and test equipment), which are required to be used in different buildings. It would be inefficient and costly to transport these machines between sites in different locations.
- **Environmental Impact** – Having one site minimises the number and maximises the efficient use of vehicles to transport components, thus reducing Tesla's environmental impact.

5.2.11 It is not practical to separate out the manufacture of electromagnets and other products across different sites, for the reasons set out in the bullet points above.

5.2.12 For additional context, due to an urgent need for additional floorspace prior to the development of Unit 9, Tesla previously operated from an additional site in Lancing for a trial period of 5 years. This experience demonstrated that operating from two separate premises was impractical and inefficient. As a result of this experience, Tesla considers it essential that the business operates from a single complex and was critical to the investment.

5.3 EXISTING AND FUTURE ECONOMIC BENEFITS

5.3.1 Tesla Engineering is one of the district's largest private sector employers and the employment and local spend they sustain contributes significantly to the local economy.

5.3.1 Tesla is a socially inclusive employer, offering a wide spectrum of positions suiting a variety of skill levels and abilities. Approximately 452 people are employed at their existing facilities at Water Lane, of which the machine operatives who will work from the proposed extension comprise some of the most highly skilled and highly paid in the workforce. Many of Tesla's employees live in Storrington and approximately 80% of staff live within 15 miles of the existing facility.

5.3.2 This application presents an opportunity for the local economy to benefit from the facilitation of Tesla's continued success through support of existing and future jobs associated, additional indirect employment through the supply chain, additional business rates, increased local spend and continued investment in employees training and career progression.

5.3.3 The benefits identified above are additional to the benefits arising from the construction phase, which given the nature and scale of development proposed will themselves be significant, comprising an investment of around £3m in construction value, helping sustain further jobs directly and indirectly over the course of construction.

- 5.3.4 By contrast, if restrictions are placed on Tesla's ability to expand, this will inhibit the capacity of the business to fulfil additional and more specialist contracts and undoubtedly be detrimental to the long term growth potential of Tesla and employment opportunities for existing and future employees within the business.

5.4 ALTERNATIVES TO THE PROPOSED DEVELOPMENT

- 5.4.1 As described above, Tesla has a requirement for an extension to Unit 12 to create a new machine room facility to fulfil larger and more complex contracts requiring more specialist machines. Without the proposed development, the business has three potential options:

- (1) To create additional floorspace within Water Lane Industrial Park;
- (2) To create additional floorspace elsewhere within the District; or
- (3) To relocate the entire business to an alternative location.

Option 1 – Additional floorspace within Water Lane Industrial Park

- 5.4.1 Tesla's site within the Water Lane Industrial Park is intensely developed, with the current application site comprising the only opportunity to provide additional space to accommodate the scale of development required to meet the identified purpose.
- 5.4.2 There is no scope to redevelop the site either, due to the limited size of the site and because any redevelopment would require a temporary relocation, which would be impractical even if there was a suitable site available. These reasons weighed heavily in favour of the previous decision by Horsham District Council to permit Unit 9 and most recently Units 11 and 12.
- 5.4.3 The Northern West Sussex Economic Growth Assessment Update was published in November 2020 as part of the emerging Horsham Local Plan evidence base and supports this conclusion, noting that there is limited potential for intensification of use at the Water Lane Industrial site following expansion of the Tesla site opposite. It is confirmed that as a result of Tesla's expansions, the boundary of the Key Employment Area should be amended to include the area north of Water Lane. This is taken forward within the emerging Local Plan.
- 5.4.4 Notwithstanding this, the former 'Paula Rosa' kitchens facility within Water Lane Industrial Park was recently put up for sale. This was considered by Tesla at the time of sale but discounted for a number of reasons primarily relating to building heights and the necessity to demolish and reconstruct the buildings in addition to the competing cost of the land at residential land values.
- 5.4.5 The 'Paula Rosa' kitchens site (which accounted for more than 50% of Water Lane Industrial Park site area) has since been redeveloped to create 98 dwellings in December 2016 and so is no longer available.²

² HDC Reference DC/15/2788

Option 2 - To create additional floorspace elsewhere

- 5.4.6 Tesla has previously rented 15,000sqft of floorspace in Lancing, approximately 10 miles (20 minutes) driving distance from their Storrington complex. Following a trial period of five years, this arrangement was terminated due to the impracticalities and inefficiencies resulting from the distance between the two sites. This was therefore a short-term solution which did not solve the problems. Having two separate premises has therefore been found to be impractical and inefficient. As a result of this experience, Tesla consider it essential that the business operates from a single complex.
- 5.4.7 The proposed extension of Unit 12 to provide a new specialist machine room to accommodate larger machines is proposed to be both functionally and physically linked to Unit 12 such that it is logistically impossible for the extension to be located on a site elsewhere.
- 5.4.8 That being the case, if additional development were not possible on or adjacent to the existing site, the only alternative would be to relocate the whole operation to a different site with further expansion potential. Given the significant investment that has been made in providing new facilities at Water Lane in recent years, relocating the entire operation in order to provide an additional 1,294sqm of floorspace would not be a viable option, or indeed a proportionate solution to the current problem.
- 5.4.9 Notwithstanding this, a review of other available sites within relative proximity to Water Lane was previously undertaken as part of application DC/17/1367 and was unable to identify any suitable alternative sites.
- 5.4.10 As part of the emerging Horsham Local Plan, the Northern West Sussex Economic Growth Assessment Update was published in November 2020 and identified a worsening outlook for manufacturing growth in Horsham District and a reduction in need for manufacturing land within the Plan period. By consequence, the emerging Plan does not allocate any new sites for the specific requirements of specialist manufacturing and instead allocates flexible employment use land across four sites in Partridge Green (EM1), Horsham (EM2), Pulborough (EM3) and Southwater (EM4). EM1 and EM2 are the largest and allocate just 9,000sqm each. Both sites would therefore fall substantially short of the floorspace required to re-located the Tesla Engineering facility and in any event, are both understood to be subject to environmental constraints which would restrict future growth potential.
- 5.4.11 Given all of the above, it is clear that there are no logical, viable, reasonable alternatives within the district to accommodate the proposed development. Moreover, strategic locations for new employment land identified by Horsham District Council sites not within the development plan will not come forward for at least a number of years, such that these sites would not meet the immediate existing (and ongoing) needs of Tesla as a business.

Option 3 - To relocate the entire business to another location

- 5.4.12 A further option for Tesla would be to relocate their entire business to another location, either outside of the District or the UK. Whilst Tesla is committed to Storrington and wish for their premises to remain in the village, given their international market, they would be able to move to another country if necessary.

- 5.4.13 For example, Tesla's market is increasingly in China, such that the whole business could be moved to this country, or any other country, where production would be cheaper. Work has already been transferred to the Netherlands, to Tesla's Dutch sister company and to a company in the north of England, from the Storrington site.
- 5.4.14 A wholesale move of the business outside of the District or abroad would result in the loss of the existing jobs at Tesla (452 people) and the loss of the employment opportunities that would come about as a result of the proposed development (circa 10 – 20 people). This would be to the detriment of Horsham District's economy. There would clearly also be the lost employment opportunities in relation to the construction of the proposed development.
- 5.4.15 Some employees may well relocate away from Horsham, resulting in a loss of built up expertise and experience within the local workforce.

Do Nothing

- 5.4.16 If Tesla are not able to expand, they will lose business through either declining to tender or not being able to meet lead times due to lack of capacity, resulting in a loss of income generation into the local economy through jobs and the multiplier effect. The following would come about:
- The loss of the employment opportunities as a result of the proposed development;
 - The loss of employment opportunities in the construction industry in developing the proposed facility;
 - The loss of an opportunity to increase indirect expenditure in the local economy.
- 5.4.17 The 'do nothing' scenario would therefore involve the loss of an opportunity to create high-end jobs and the loss of the economic benefits that come about as a result. There is also the risk that Tesla may well become less competitive and lose their market share if they are not able to meet demand. The risk to the Horsham District is that Tesla would not 'do nothing' and would be forced to relocate to an expanded premises outside of the District, or UK in a location which would provide adequate floorspace. This would not only result in the above list of outcomes, but also a loss of the 452 existing jobs at the factory.

5.5 CONCLUSION

- 5.5.1 This section has outlined the alternative assessment undertaken to demonstrate why the proposed development is appropriate for development given its location outside the limits to built development and the designated employment area at Storrington.
- 5.5.2 In the context set out above, it is very clear that developing an under-utilised area of hardstanding within the existing site is a far more pragmatic, efficient and cost-effective solution to achieve the required floorspace.

6 PLANNING APPRAISAL

6.1 PRINCIPLE OF DEVELOPMENT

- 6.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 6.1.2 One of the primary development plan documents in Horsham is the Horsham District Planning Framework 2015. One of the key aims of the HDPF 2015 is to achieve and maintain economic prosperity in the District. It recognises the need for opportunities for existing businesses to grow, expand and change to meet modern business demands.

Location

- 6.1.3 HDPF Policy 2 focuses development in the main settlements and encourages the re-use of previously developed land. Policy 3 directs development within existing settlements which have defined built-up area boundaries. Policy Thakeham 1 of the Thakeham Neighbourhood Plan (TNP) applies the development plan policies for development in the countryside outside the built-up area boundaries.
- 6.1.4 It is acknowledged that the site falls outside built-up area boundaries and so is 'countryside' for planning purposes. Notwithstanding this, it is also clear that the site comprises under-utilised previously developed land in the form of an established existing employment operation.
- 6.1.5 HDPF Policy 4 permits development outside built up area boundaries where, amongst other criteria, a site has been allocated in a local plan or neighbourhood plan. Whilst the site is not yet allocated within an adopted development plan, it is proposed to form part of an expanded Key Employment Area within policy 30 of the emerging Horsham Local Plan. Whilst only limited weight can be attributed to the emerging plan policies, more weight can be attached to its evidence base, which includes the fact that the wider site has already been developed for employment use.
- 6.1.6 The proposed development is otherwise entirely consistent with the objectives of adopted policy 4 and is compliant with all four remaining criteria insofar as the development is appropriate in scale and function, meets an identified employment need, does not conflict with the development strategy and is contained within an existing defensible boundary by virtue of its enclosed location between Unit 11 and Unit 12. It is clear that any harm arising from technical conflict with Policy 4 is completely outweighed by the benefits of the development, taking into account the situation on the ground, and the overall compliance with the objectives of the policy when considered as a whole. This clearly justifies a departure from the Plan.

Intensification of existing employment sites

- 6.1.7 HDPF Policy 7 supports the intensification of existing employment sites. NPPF paragraph 85 states that significant weight should be placed on the need to support economic growth. NPPF paragraph 88 supports the sustainable growth

and expansion of businesses in rural areas including through the provision of well-designed new buildings.

Alternatives

- 6.1.8 It is clear from the Need and Alternatives Assessment at Section 5 that there are no suitable alternatives to the proposed development for the reasons set out in that assessment. That assessment also set out in detail the need for and benefits of the proposed development.

Compliance with the emerging Local Plan

- 6.1.9 The application site is proposed to be allocated within the expanded 'Water Lane, Storrington' Key Employment Area in the emerging Local Plan, which takes into account the recent industrial development on the wider site.
- 6.1.10 Draft Policy 30 of the submission HDLP supports the intensification and expansion of existing employment sites, subject to criteria which are all met by the application proposal:
- a) it is in keeping with the existing scale of provision and local area;*
 - b) the proposal will complement and not prejudice the operation of surrounding employment uses;*
 - c) it protects the amenity of existing and surrounding uses;*
 - d) any adverse impacts would not significantly outweigh the benefits; and it is a Key Employment Area or Other Existing Employment Site as defined in this policy.*
- 6.1.11 It is demonstrated within this Statement that the proposals are appropriate in scale and clearly complement the existing employment use. There are no material adverse impacts that would weigh against the proposals. Accordingly, the proposed development would wholly comply with emerging Policy 30.
- 6.1.12 Whilst it is acknowledged that there is uncertainty about the future of the plan, the expansion of the Key Employment Area was recommended by robust, independently prepared technical evidence included within the Evidence Base of the emerging plan. This evidence represents the most up-to-date economic evidence available within Horsham and should form a significant material consideration in the determination of this application.

Absence of Actual Harm

- 6.1.13 Notwithstanding the technical conflict with the adopted Local Plan, it has been demonstrated within this Statement that the modest intensification of an existing commercial site by way of re-developing under-utilised hardstanding in a logical location between two existing units, would not give rise to any actual harm.
- 6.1.14 It is demonstrated through robust evidence that there are no design, landscape, transport, amenity or environmental reasons to resist the proposed development which is policy compliant in all other respects.

- 6.1.15 It is considered that the absence of actual harm is material in its own right and when considered alongside the clear and tangible economic and social benefits to the District, outweigh the minor degree of conflict in principle with the spatial strategy.

Summary

- 6.1.16 Given all of the above, it demonstrated that compelling reasons exist which justify a departure from the development plan in accordance with Section 38(6) and the significant benefits of retaining Tesla in the district in the long term outweigh the policy considerations which restrict development in the countryside particularly when there are no other policies or material considerations (as set out below) which indicate that permission should be withheld.

6.2 DESIGN, LANDSCAPE AND VISUAL IMPACT

- 6.2.1 HDPF Policy 32 promotes a high standard of design, whilst Policy 33 seeks the efficient use of land, effective integration with the character of the surrounding area, and high quality and appropriate materials amongst other things.
- 6.2.2 The proposed design has been carefully scaled in form and height to sit within the visual envelope of the two adjacent units, minimising the perceptibility of the proposed unit from the site perimeters. Unit 12A would be of similar architectural appearance and materiality to those approved on Units 11 and 12.
- 6.2.3 An Addendum Landscape and Visual Impact Assessment has been undertaken and is submitted with the application. This notes that the site is already developed and in industrial use, as part of an existing wider industrial estate, and is visually and functionally separate from the landscape around it to the west and north.
- 6.2.4 The proposals would introduce some new built form and would affect some localised views from the west, but the new building would not be widely visible, and where visible would only be seen in the context of the larger existing buildings around it. There would be some low level visual effects for users of the public footpath though these views would only affect a short section. These initial adverse effects would decrease progressively with time, as the western and northern boundary planting which is already in place begins to mature, and would be insignificant after around 7 to 8 years.
- 6.2.5 For the avoidance of doubt, the site is around 3km from the nearest point of the National Park with any views towards it, and there would be no significant visibility of the new building from within the designated area, and no effects on the landscape or setting of the National Park.
- 6.2.6 In summary, any landscape or visual effects would be at a low level, would be felt over a very limited area around the site, and would decline further over time. Accordingly, the proposed development design and its impact on the character of the area is compliant with policies 32 and 33 of the HDPF.

6.3 TRANSPORT

- 6.3.1 The application is accompanied by a Transport Statement prepared by DHA Transport.
- 6.3.2 It is demonstrated that the site is well served by non-car transport provision, particularly by bus services running to the south of the Water Lane / Thakeham Road junction. These can be accessed via a short walk from the site using Water Lane and the footways provided.
- 6.3.3 In terms of parking, at present, the wider site comprises 129 parking spaces, which results in an excess parking provision of 20 spaces for Units 11 and 12 against West Sussex County Council (WSCC) parking standards. The development proposals result in a requirement for 32 parking spaces, therefore the provision of an additional 12 spaces will ensure that the total level of parking on-site is in accordance with WSCC parking standards. Provision for Electric Vehicle (EV) charging will be provided in accordance with Building Regulations Part S. No additional cycle parking is proposed on-site due to existing capacity within the existing cycle store
- 6.3.4 With regard to trip generation, the proposed development is forecast to generate approximately 32 vehicle movements over the 12-hour weekday period (07:00-19:00), with no movements taking place in the AM and PM peak hours. This is not considered to have a significant or 'severe' residual impact on the operation of the local highway network with reference to Paragraph 116 of the NPPF.
- 6.3.5 No changes to the existing delivery and servicing arrangements are proposed.
- 6.3.6 It is therefore concluded that there should be no sound transport-based objections to the planning application.

6.4 ECOLOGY

- 6.4.1 The application site lies entirely upon existing hardstanding and is not anticipated to result in any impact on existing trees or ecology. As such no ecology surveys have been deemed necessary to be provided.
- 6.4.2 For the avoidance of doubt, the proposed development is considered to be exempt from the national 10% Biodiversity Net Gain (BNG) requirement, since the proposals are below a 'de minimis threshold', i.e. the proposed works do not impact a priority habitat and will impact <25sqm of non-priority onsite habitat. Therefore, a BNG assessment is not necessary for the proposed development.

6.5 FLOOD RISK & DRAINAGE

- 6.5.1 A Flood Risk Assessment (FRA) has been prepared by Evans & Langford LLP in accordance with the NPPF and the associated Planning Practice Guidance.

Flood Risk

- 6.5.2 The site is identified as being in fluvial and tidal Flood Zone 1, therefore, the site has no risk or low risk of flooding along the site boundary. Access is provided to the site by a culvert which crosses over a ditch in Water Lane, the carriageway being at low risk of flooding.
- 6.5.3 In terms of surface water flooding, the stream at the site access point has been redirected into a culvert beneath the new entrance. Now, the stream flows through an underground channel, allowing the new access road to pass over it. This area now features a roadway that crosses over the former ditch via a box culvert.
- 6.5.4 The ditch and culvert were modelled, with calculations and proposals submitted to both Horsham District Council and the EA. Ordinary Watercourse Land Drainage Consent for the construction of the culvert was issued by the West Sussex Flood Risk Partnership on 23/08/2013.
- 6.5.5 The Environment Agency have previously confirmed that they are satisfied that flooding from the watercourse is restricted to Water Lane itself and not the development site. As noted above the carriageway of Water Lane has a low risk of surface water flooding. As such the Sequential Test can be deemed to have been met.
- 6.5.6 Notwithstanding this, should HDC consider that a Sequential Test is required, it clearly demonstrated within Section 5 of this Statement that the proposed development is required to be located in the proposed development area and that there are no reasonable alternative sites to accommodate the proposals.
- 6.5.7 There are consequently no reasonable grounds upon which to resist development on flood risk grounds.

Drainage

- 6.5.8 The existing surface water drainage system for Unit 12 was designed to accommodate the possible future extension as covered in this scheme. The location of the building extension is the hardstanding to the front of the building, so there is no additional hardstanding being created. The drainage to be provided for this Unit 12A extension will therefore integrate into the existing system with some minor modifications required to suit the extension location. The proposal includes measures to manage surface water runoff, ensuring that the development does not increase flood risk to other sites. The drainage system is designed to handle the 100-year flood event plus 45% for climate change in accordance with the latest Arun and Western Streams Management Catchment peak rainfall allowances.

6.6 AIR QUALITY

- 6.6.1 The application is accompanied by an Air Quality Assessment undertaken by SLR Consulting, in consultation with HDC's Environmental Health team. The Assessment considers the impact of the proposed development on air quality, and

in particular on the Storrington Air Quality Management Area (AQMA) at both the construction and operational stages.

- 6.6.2 A qualitative assessment of the potential dust impacts during the construction of the development has been undertaken following IAQM guidance. Providing effective mitigation measures are implemented, such as those outlined in Table 7-1 of this report, residual impacts from dust emissions during the construction phase are deemed to be 'not significant'.
- 6.6.3 In terms of operational phase effects, the Proposed Development is expected to generate road traffic volumes well below the EPIC & IAQM screening criteria. As such, it is considered that road traffic impacts associated with the operation of the Proposed Development will have an 'insignificant' effect on local air quality.
- 6.6.4 In accordance with the Sussex-air guidance, an estimation of the pollutant emission costs associated with the Proposed Development has been undertaken. The calculated damage cost is £2,176. As discussed in Section 7.2.2, an additional 4 EV charging points have been installed across the wider Tesla Engineering site, the cost of which exceeds the calculated damage cost. The additional 4 EV charging points are therefore considered to satisfy the Site's mitigation requirements.
- 6.6.5 As such, it is considered that the proposals conform to the principles of National Planning Policy Framework, the HDC District Planning Framework, and local guidance in regard to air quality.

6.7 NEIGHBOURING AMENITY

- 6.7.1 Strategic Policy 20 of the submission HDLP requires development to be designed to avoid unacceptable harm to the amenity of existing and future occupiers or users of nearby property and land.
- 6.7.2 In this regard, the application is not located within close proximity to sensitive receptors and is to the contrary, located within the developed area of the Tesla Engineering commercial site. The proposals will include additional plant, however these will be contained within an enclosed building are not considered to result in a substantial change to the conditions of the wider area.
- 6.7.3 By virtue of the existing character of the application site and the significant distances to sensitive receptors, there are not considered to be any material adverse impacts arising from the proposed Unit 12 extension. Notwithstanding, should it be deemed necessary, a condition requiring the submission of a noise mitigation method statement could be secured by way of a suitably worded condition.

6.8 WATER NEUTRALITY

- 6.8.1 The application site falls within the Sussex North Water Supply Zone as defined by Natural England which draws its water supply from groundwater abstraction at Hardham. Natural England has issued a Position Statement for applications within the Sussex North Water Supply Zone which states that it cannot be concluded

with the required degree of certainty that new development in this zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites.

- 6.8.2 Natural England advises that plans and projects affecting sites where an existing adverse effect is known will be required to demonstrate, with sufficient certainty, that they will not contribute further to an existing adverse effect
- 6.8.3 The application is consequently supported by a Water Neutrality Statement which sets out that:
- Unit 2 is to be retrofitted with water efficient kitchen and basin taps
 - Unit 12A to use same fittings, where applicable as Unit 11.
- 6.8.4 It is demonstrated that the offset required for Unit 12A is 482.12 litres per day. Partial retrofit of Unit 2 provides additional savings/credit of 193.41 litres per day, thus water neutrality is achieved.

6.9 CONTAMINATION

- 6.9.1 Evans and Langford had undertaken full contamination assessment of the site including soil sampling and ground gas monitoring as part of planning application DC/17/1367.
- 6.9.2 The report confirmed that all contaminant concentrations are identified as being low and are not of concern with respect to human health, in a commercial land use scenario. In addition, it should be noted that all measured concentrations fell below the most stringent screening values, those for a residential land use with the consumption of home grown produce and therefore risks to all potential receptors, via all potential exposure pathways, are considered to be Low.
- 6.9.3 With regard to ground gas, monitoring took place between 28/02/17 and 30/03/17. The site was identified as being within the lowest risk category and is therefore deemed to represent very low hazard potential.
- 6.9.4 The same report provides structural design considerations in light of the ground investigation findings.
- 6.9.5 The proposed development therefore accords with Policy 24 of Horsham's District Planning Framework 2015.

7 SUMMARY AND CONCLUSIONS

7.1 SUMMARY

- 7.1.1 This Statement has been prepared by DHA Planning in support of an application seeking full planning permission on behalf of Tesla Engineering Ltd for the construction of an industrial building extension to Unit 12 with associated parking and ancillary works on land adjacent to Unit 12 Tesla Engineering, Water Lane, Storrington.
- 7.1.2 The proposed development is located outside of the built-up area boundary of Storrington and is not currently allocated. However, the site falls within an area of previously developed land on an existing employment site which is intended to be designated within the expanded 'Water Lane, Storrington' Key Employment Area within a future Local Plan.
- 7.1.3 Notwithstanding the technical conflict with the adopted spatial development strategy, it is demonstrated that the explicit local and national policy support for the intensification of existing employment sites, the lack of alternatives sites, clear economic and social benefits of the proposal and the consistency of the proposals with the emerging Local Plan amount to clearly outweigh the policy considerations to restrict development in the countryside.
- 7.1.4 In wider terms, the proposals are demonstrated to be acceptable from a design, landscape, transport, amenity and environmental perspective and will deliver substantial direct and in-direct economic and social benefits associated with the continued growth of one of the District's major employers.
- 7.1.5 In contrast, there would be little, if any, resultant harm as a result of this relatively modest extension within an existing major commercial development.

7.2 CONCLUSION

- 7.2.1 Taking all of the above into consideration, compelling circumstances exist which justify a departure from the development plan. Furthermore, wider material considerations support the proposed commercial extension. We therefore respectfully request that planning permission be granted without delay.