



DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:

DC/26/0051

Renvyle, Okehurst Lane, Billingshurst, West Sussex, RH14 9HR

DESCRIPTION:

Construction of a warehouse to be split into four separate units (Class E(g)) with new internal access road.

RELEVANT PLANNING HISTORY:

None relevant

RELEVANT PLANNING POLICIES

The National Planning Policy Framework (NPPF)

Horsham District Planning Framework (2015):

- Policy 1 - Strategic Policy: Sustainable Development
- Policy 2 - Strategic Policy: Strategic Development
- Policy 3 - Strategic Policy: Development Hierarchy
- Policy 4 - Strategic Policy: Settlement Expansion
- Policy 7 - Strategic Policy: Economic Growth
- Policy 9 - Employment Development
- Policy 10 - Rural Economic Development
- Policy 11 - Tourism and Cultural Facilities
- Policy 12 - Strategic Policy: Vitality and Viability of Existing Retail Centres
- Policy 13 - Town Centre Uses
- Policy 14 - Shop Fronts and Advertisements
- Policy 15 - Strategic Policy: Housing Provision
- Policy 16 - Strategic Policy: Meeting Local Housing Needs
- Policy 17 - Exceptions Housing Schemes
- Policy 18 - Retirement Housing and Specialist Care
- Policy 19 - Park Homes and Residential Caravan Sites
- Policy 20 - Rural Workers Accommodation
- Policy 21 - Strategic Policy: Gypsy and Traveller Sites Allocations
- Policy 22 - Gypsy and Traveller Sites
- Policy 23 - Strategic Policy: Gypsy and Traveller Accommodation
- Policy 24 - Strategic Policy: Environmental Protection
- Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
- Policy 26 - Strategic Policy: Countryside Protection
- Policy 27 - Settlement Coalescence
- Policy 28 - Replacement Dwellings and House Extensions in the Countryside
- Policy 29 - Equestrian Development
- Policy 30 - Protected Landscapes
- Policy 31 - Green Infrastructure and Biodiversity
- Policy 32 - Strategic Policy: The Quality of New Development
- Policy 33 - Development Principles
- Policy 34 - Cultural and Heritage Assets

Policy 35 - Strategic Policy: Climate Change
Policy 36 - Strategic Policy: Appropriate Energy Use
Policy 37 - Sustainable Construction
Policy 38 - Strategic Policy: Flooding
Policy 39 - Strategic Policy: Infrastructure Provision
Policy 40 - Sustainable Transport
Policy 41 - Parking
Policy 42 - Strategic Policy: Inclusive Communities
Policy 43 - Community Facilities, Leisure and Recreation

Billingshurst Parish Neighbourhood Plan (BPNP) 2019 - 2031:

Policy BILL1 – Billingshurst Built-Up Area Boundary
Policy BILL10 – Flexible Workspaces

Paragraph 33 of the NPPF requires that all development plans complete their reviews no later than 5 years from their adoption. Horsham District Council is currently in the process of reviewing its development plan however at this stage the emerging policies carry only limited weight in decision making. As the HDPF is now over 5 years old, the most important policies for the determination of this application must be considered as to whether they are 'out of date' (NPPF paragraph 11d). This includes, for applications involving the provision of housing, whether the Council can demonstrate a five year supply of deliverable housing sites (NPPF footnote 8).

The Council is currently unable to demonstrate a five year supply of deliverable housing sites, with the supply currently calculated as being 1.7-years. The presumption in favour of development within Paragraph 11d) of the NPPF therefore applies in the consideration of all applications for housing development within the District (unless footnote 7 or Paragraph 14 applies to relevant applications), with Policies 2, 4, 15 and 26 now carrying only moderate weight in decision making.

All other policies within the HDPF as itemised above have been assessed against the NPPF and are considered to be consistent such that they continue to attract significant weight in decision making.

Horsham District Local Plan (2023-40) (Regulation 19):

Strategic Policy 1: Sustainable Development
Strategic Policy 2: Development Hierarchy
Strategic Policy 6: Climate Change
Strategic Policy 7: Appropriate Energy Use
Strategic Policy 8: Sustainable Design and Construction
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
Strategic Policy 19: Development Quality
Strategic Policy 20: Development Principles
Strategic Policy 23: Infrastructure Provision
Strategic Policy 24: Sustainable Transport
Policy 25: Parking
Strategic Policy 27: Inclusive Communities, Health and Wellbeing
Strategic Policy 29: New Employment
Strategic Policy 30: Enhancing Existing Employment
Policy 31: Rural Economic Development

Supplementary Planning Guidance:

Planning Obligations and Affordable Housing SPD (2017)
Community Infrastructure Levy (CIL) Charging Schedule (2017)

Planning Advice Notes:

REPRESENTATIONS AND CONSULTATIONS RESPONSES

Where consultation responses have been summarised, it should be noted that Officers have had consideration of the full comments received, which are available to view on the public file at www.horsham.gov.uk

Consultations:

HDC Arboricultural officer: Comment / No Objection

Minor amendment to the proposed section of no-dig access drive would enable the protection of the key rooting area of one of the principal oak trees on the E[ast] boundary whilst enabling practicality of construction. The mature oak trees make a positive contribution to the landscape character and are worthy of conservation/constraining development of the countryside. Conditions recommended.

HDC Conservation: No Objection / Comment

I am satisfied the proposal will not visually harm the setting of the neighbouring listed building. However, I am mindful that activity could increase the impact of noise and artificial light and vehicular movements that would dilute an ability to experience the listed building with reference to a historic agricultural context. I am satisfied the impact would be low but less than substantial nonetheless.

HDC Environmental Health: No Objection / Comment

This Department have no objections to this application, and we recommend that the site is restricted

Class E - Commercial, Business and Service only.

Before permission is granted, the applicant must submit a plan detailing any proposed external plant (i.e., air conditioning units) and/or external lighting, etc.

Ecology Consultant: More Information

We have reviewed the Ecological Impact Assessment (Ecological Surveys Ltd., December 2025) relating to the likely impacts of development on designated sites, protected and Priority species & habitats and identification of appropriate mitigation measures.

We are not satisfied that there is sufficient ecological information available for determination of this application and recommend that further information with regard to protected species and habitats is provided prior to determination.

Southern Water: Comment

Comments regarding tree planting; proposed SuDS features; soakaways; septic tank. Full comments can be viewed on Horsham District Council's website.

WSCC Highways: More Information

The proposal seeks permission for new 'industrial process'/ warehouse building of 480sqm split into 4 x units with new internal access road to connect to adjacent property (farm).

Site utilises existing private access road which joins with public highway at Okehurst Lane (D class rural and subject to national speed limit). Considering rural nature, width and geometry vehicle speeds are not anticipated to be exceeding posted limit where the access meets with Okehurst Lane.

The existing access is of loose gravel and would benefit from improvement. Whilst the size of the building is not required to provide a full Transport Statement the LHA require further information

PUBLIC CONSULTATIONS:

Representations:

4x letters of Objection have been received from 3 addresses, objecting to the application on the following grounds:

- Loss of General Amenity (4)
- Highway Access and Parking (4)
- Privacy Light and Noise (3)
- Other (2)
- Design (2)
- Overdevelopment

Comments concerned previous application refusals, the nature of the highway and its current use / state being incompatible with the proposed use, drainage concerns, Listed Building impacts, no noise assessment, lack of detail concerning proposed use, detriment to the neighbouring amenity.

Parish Comments:

None received

Member Comments:

None received

HUMAN RIGHTS AND EQUALITY:

The application has been considered having regard to Article 1 of the First Protocol of the Human Rights Act 1998, which sets out a person's rights to the peaceful enjoyment of property and Article 8 of the same Act, which sets out their rights in respect to private and family life and for the home. Officers consider that the proposal would not be contrary to the provisions of the above Articles.

The application has also been considered in accordance with Horsham District Council's public sector equality duty, which seeks to prevent unlawful discrimination, to promote equality of opportunity and to foster good relations between people in a diverse community, in accordance with Section 149 of the Equality Act 2010. In this case, the proposal is not anticipated to have any potential impact from an equality perspective.

PLANNING ASSESSMENT

This application is for Construction of a warehouse to be split into four separate units (Class E(g)) with new internal access road at Renvyle Farm, Okehurst Lane, Billingshurst. The application sits within the developed farmyard to the east of two barns (one of which is derelict) and accessed off of Okehurst Lane via driveway. The application site sits west of Wynstrode Farmhouse, a Grade II Listed Building (indexed 1959) described by Historic England as "L-shaped C17 or earlier timber-framed building with plaster and painted brick infilling restored and enlarged. First floor of north face of west wing tile-hung. Tiled roof. Casement windows. Two storeys. Five windows. Modern addition at west end". The surrounding context consists of sporadic development including residential uses in open countryside though the application site sits bounded within agricultural land. Wynstrode Farmhouse itself is viewed in association with the site.

Principle of Development:

Paragraph 88 of the NPPF (2024) states "[p]lanning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings;
- b) the development and diversification of agricultural and other land-based rural businesses;
- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

Paragraph 89 of the NPPF (2024) states that “[p]lanning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

Policy 1 of the Horsham District Planning Framework (HDPF) states that the council will take positive approach to development proposals, aligning with the National Planning Policy Framework's emphasis on sustainable development. It collaborates proactively with applicants to find solutions that enable project approval and enhance economic, social, and environmental conditions. Planning applications that comply with the Local Plan and relevant neighbourhood plans will be approved promptly unless material considerations suggest otherwise. If policies are absent or outdated, the Council will grant permission unless significant adverse impacts outweigh the benefits, or specific policies in the Framework restrict development.

Policy 4 of the HDPF refers to the expansion of settlements outside the built-up area, and states that such development is only supported where: the site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge; the level of expansion is appropriate to the scale and function of the settlement type; the development is demonstrated to meet the identified local housing needs; the impact of development individually or cumulatively does not prejudice comprehensive long term development; and the development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced.

Policy 7 of the HDPF advocates for Economic Growth. Sustainable employment development will be achieved in a number of ways including:

- Redevelopment, regeneration, intensification and smart growth of existing employment sites.
- 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
- Encouraging appropriate workspace and ICT infrastructure including high speed broadband to support flexible and homeworking
- Retention of key employment sites and identifying additional employment sites
- Promotion of district as an attractive place to stay and visit to encourage tourism and value of tourism economy
- Expansion of higher education facilities; R&D; employment training facilities.

Policy 10 of the HDPF seeks to support sustainable rural economic development, and the productive use of land that maintains the relative tranquillity of the countryside in order to generate local employment opportunities and socio-economic benefits for local communities. Policy 10 stipulates that development must:

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

Policy 25 of the HDPF seeks that the natural environment and the local character of Horsham District including the landscape, the landforms and development pattern will be protected from inappropriate development. The policy aims to:

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

Policy 26 of the HDPF requires development in the countryside be of a scale that is appropriate to its countryside character and location and not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside. It also needs to be essential to its countryside location and to meet one of the following criteria:

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

Policy BILL1 directs new development in Billingshurst parish to within the defined built-up area boundary of Billingshurst village, as shown in the Policies Maps. Proposals located outside this boundary will only be supported where they comply with countryside policies in the development plan, are required for essential utilities, provide appropriate tourism-related uses, or are situated on sites specifically allocated for such purposes in the Horsham District Planning Framework or its successor.

Policy BILL10 states proposals for incubator or start-up business space will be supported through either the conversion of existing High Street buildings or the development or conversion of premises within the settlement boundary. New workspaces must demonstrate that they can be integrated into their surroundings without causing unacceptable impacts on residential amenity or the safety and capacity of the local highway network.

The application is for the erection of a proposed warehouse with 4 workshop spaces sited within the existing farmyard that appears to be in use. The proposal is located in the countryside, located 0.7km (as the crow flies) from the built up area of Billingshurst and thus assessed under countryside policies.

The proposed warehouse looks to be sited approximate to where a previous barn structure was placed from Google Earth Imagery. This barn was removed sometime after July 2022 but before March 2024, according to Google Earth satellite imagery. Though this would lend weight to the land being previously developed, the land is not considered as such as under the glossary of terms in the NPPF as “previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings...”. As such, the development would represent new development on undeveloped land.

The proposal has stated that the proposed workshops would be for the purpose / uses within Use Class E(g) which includes “[u]ses which can be carried out in a residential area without detriment to its amenity including:

- E(g)(i) Offices to carry out any operational or administrative functions,
- E(g)(ii) Research and development of products or processes
- E(g)(iii) Industrial processes”

This would amount to the diversification of the rural economy / farming enterprise on site offering chance for employment benefit. No detail has been provided regarding the actual use of the workshops beyond being within Class E(g) nor regarding operating times.

Policy 7 supports the development of small, start-up and move-on businesses, which this application could be considered to meet. However, this provision must be read and assessed in the context of the

development plan as a whole. Whilst diversification of the rural economy could be considered to occur at the site owing to the implantation of the scheme, it is not considered that proposal would satisfy the criteria identified in full. The proposal is not considered relevant to its countryside location in that it does not support agricultural / forestry development nor enable the sustainable development of the locale in line with policies 25 and 26 of the HDPF and BILL10 of BPNP. The site though contained within a farmyard would be considered undeveloped land using the NPPF definition and would mark new development. As such, the development is located outside of the built up area boundary, is not located in an existing rural enterprise park or within an existing building and would therefore be contrary to the spatial policies 1 and 4 and policy 10 of the HDPF.

Given the above, it is considered that the nature of the proposal (warehouse / workshop unit) coupled with its countryside location outside the defined built-up area boundary, leads to the conclusion that the proposal would fail to comply with any of the development plan policies that relate to development outside of the defined built-up area, and the application site would not be an appropriate location for development of this type. Crucially, though it is acknowledged that the proposal would amount to some economic benefit, the proposal does not demonstrate compliance with the core policies of Policy 10 of the HDPF- notably 1(a) and/or (b). The principle of development is therefore not supported, and the proposal is considered to be contrary to Policies 10; 25; 26 of the Horsham District Planning Framework (HDPF, 2015) and Policies BILL1; BILL10 of the Billingshurst Neighbourhood Plan (BPNP, 2021).

Design and Appearance:

Paragraph 130 of the NPPF states that planning decisions should ensure that developments function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting; establish 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; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and create places that are safe, inclusive and accessible.

Policy 32 and 33 of the HDPF seeks to ensure that development promotes a high standard and quality of design in order to enhance and protect locally distinctive characters. The policies also seek to ensure that the scale, massing and appearance of development relates sympathetically with the built surroundings, landscape, open spaces and routes within and adjoining the site, including any impact on the skyline and important views.

The proposal sees the erection of a warehouse / workshop space centred roughly centrally on the site within the existing developed built form of the farm yard. The proposal looks to be sited roughly where there was a previous agricultural barn though this has now been removed. The proposal comprises a structure approximately 25m in width, 12m in depth with an overall height of around 4.2m. Each workshop (4 total) is approximately 6.3m in width with a front pedestrian door and front roller shutter door.

The workshops are served by a proposed new access track which runs to the west of the existing track. Given the agricultural context of the site and the established built form, it would be considered that the development would likely integrate within the site and could be considered akin to an agricultural barn. The proposal, though lengthy, would be considered to have a fairly small impact on the landscape given the proposal is only just over 4m in height and thus would not be a particularly large development on the landscape. The site would be screened from the roadside by existing vegetation though would only be partially screened from the west, which is where the Listed Building of Wynstrode sits.

As such, it is considered the proposal integrates well within the site and is considered to abide by the policies identified above.

Trees and Landscaping and Ecology:

Policy 31 of the HDPF promotes development that protects and enhances green infrastructure and biodiversity. It supports projects that maintain ecological networks, create new habitats, and improve existing biodiversity. Loss of green infrastructure must be mitigated or compensated, and protected trees must be replaced if felled. The policy prioritizes safeguarding designated nature sites and habitats, and requires rigorous assessment and mitigation for developments impacting sensitive areas like the Arun Valley SPA and the Mens SAC.

Horsham District Council's Arboriculture Officer has inspected the plans and confirmed that there may have been historic and potentially ongoing activities that may have damaged tree rooting areas. The proposal is to implement a no-dig area which should preserve tree health. A tree on the eastern boundary is also identified as of significant value. The Officer advised that additional specialist engineering will be required beyond the scope of that indicated to protect the tree but no additional amendment to the arboricultural report was required precluding the assessment of the application as the minimal requirement had been met. An informative would be recommended to be attached if approved.

The Ecological Consultant reviewed the proposal and required further information "request[ing] clarification as to whether there will be any impact to bats, including Barbastelle bats". As this information was not available it is not considered that the proposal would satisfy the above policy without further evidence.

Heritage and Archaeology:

Section 16, Paragraph 208 of the NPPF (2024) states that "the local planning authority should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise". Paragraph 213 adds that "[a]ny harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Policy 34 of the HDPF seeks to conserve, sustain and protect the cultural and heritage assets that are within the district. It ensures that development within conservation areas is consistent with the special character of buildings and areas of which they are located within. Areas and buildings that fall under conservation, Listed Building designations or are approximate to them will be protected from inappropriate development which will harm the character and setting of the area / building.

The proposal is located approximately 100m from the Grade II Listed Building. The Conservation Officer commented that "the proposal will not visually harm the setting of the neighbouring listed building". However, the Conservation Officer commented that the proposed use would dilute the ability appreciate the Listed Building's historical context as an agricultural building in association with the farm. This is as the farm would typically operate somewhat quietly in association with the historic building. Whilst the proposal from a design standpoint would likely integrate with the Listed Building. The proposed use as 4 individual workshops would likely emanate noises of a higher decibel level and would likely disturb the tranquil environ of the countryside, and as the Conservation Officer notes, dilute the appreciation of the Grade II Listed Building. However, the Conservation Officer conceded that the harm materialising from this would be less than substantial. In addition, it is considered that the built form would be somewhat akin to an agricultural building and would continue a modern agricultural ethos in association with Listed Building. However, the orientation of the building with openings to the west (towards the Listed Building) would likely to depreciate the stature of the Listed Building with vehicles parked out the front and eroding the agricultural relationship the Listed Building has with the site, functioning like a new industrial estate which can be seen from the grounds of the Listed Building.

Overall, it would be considered that the proposal would harm the Listed Building- however, the Council's Conservation Officer has identified the harm on the lower end of the scale. To this end, Paragraph 215 of the NPPF states '*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*' As above, though the proposal has not demonstrated compliance with Policy 10 (and others), the Council acknowledges that *some* economic benefit could exist as a result of the development through the

collection of business rates and additional commerce within the District. Given that the identified harm is on the lower end of the scale, Officers are of the view that this benefit would outweigh the identified harm, thus demonstrating compliance with Paragraph 215 of the NPPF.

Residential Amenity:

Policy 33 of the HDPF states that permission will be granted for development that does not cause unacceptable harm to the amenity of the occupiers/users of nearby properties and land.

The proposal for 4 workshops in abstract given the immediate surroundings within a farm yard complex would be not considered to be of detriment to the majority of the neighbouring amenity given the separation from immediate neighbouring properties. However, given the use of the building as workshops that could operate under a multitude of uses (current proposal for unrestricted Class E), it is thought it would likely damage and erode the tranquil countryside setting by introducing noises that would be atypical to the environment.

It is considered that there would be an increase in vehicular movements for workshops in comparison to the existing agricultural use. Using OffPAT's Employment Densities Guide 2010, it would be considered that the workshops are likely to be used Industrial Purposes (B1(c)) (informed by the previous Use Class Order categorisations). OffPAT's calculations state that space required for a FTE (full time employee) for a B1(c) use requires 47m². The GIA (gross internal area) of one workshop is 105m². This would mean that each workshop would facilitate around 2.2 FTEs, for a total onsite of 8.8 FTEs. Given the location, it is unlikely that sustainable options to travel to the employment site both for employees and visitors would be afforded as the location of the site would facilitate the requirement of a car. This too is likely to erode the peaceful nature of the site and thus be of detriment to the environment generating many movements. No transport statement was provided to be inspected nor specific uses with Class E and thus it cannot be ascertained whether vehicle movements would be high. As such, it is considered that the proposal would be of detriment to the neighbouring amenity and fails to accord with the policy above.

The proposed four workshops, with unrestricted Class E use, would potentially introduce noise and activity uncharacteristic of the rural setting, resulting in harm to the tranquillity of the countryside. The likely increase in vehicular movements arising from the anticipated employment levels associated with the workshop floorspace and the site's reliance on private car travel and would further erode the peaceful character of the area. Accordingly, the proposal is considered to cause unacceptable harm to the amenity of the area and fails to accord with Policy 33 of the Horsham District Planning Framework.

Highways Impacts:

Policy 40 of HDPF promote development that provides safe and adequate access, suitable for all users. Policy 40 focuses on supporting development of a sustainable and integrated transport system that supports sustainable transport travel to access jobs, homes, and services. It encourages development that aligns with existing transport infrastructure, reduces carbon emissions, and looks to reduce travel distances and conflicts. Development will be supported where public transport access is improved, routes for cyclists and pedestrians are well implemented and ensures safe highways use for all transport modes.

Policy 41 seeks to find the right balance between ensuring that adequate parking is provided and that it is suitably located and does not conflict with other uses. It should be of good urban design and be appropriate to ensure highway safety. Development which involves the loss of existing parking spaces will only be allowed if suitable alternative provision has been secured elsewhere the need for the development overrides the loss of parking and where necessary measures are in place to mitigate against the impact.

The site would be served by a new access track to the west of the existing track that access the farm yard. Access to the site is provided by Okehurst Lane and as noted by West Sussex County Council (WSCC), speeds are not anticipated to exceed posted limits given the constraints of the road and the position of access to the wider site. WSCC were asked to comment on the proposal regarding

highways impacts. Further detail was requested by them in this regard as no transport statement was provided.

Given the highways concerns listed above in the *Residential Amenity* section of this report it is considered that there would be an increase in vehicular movements with around 8.8 FTEs expected not including customers / clients. Given the location, it is unlikely that sustainable options to travel to the employment site both for employees and visitors would be afforded as the location of the site would facilitate the requirement of a car to access. Though parking for vehicles is thought to be achievable on site, no detailed plan has been submitted regarding this. It is noted electric vehicle charging points are identified for vehicles.

Given the lack of detail it is considered that the proposal would not accord with the policies identified above.

Water Neutrality:

A 2021 Position Statement from Natural England identified that it could not be concluded with the required degree of certainty that new development in the Sussex North Water Supply Zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites. As a consequence, and to comply with the legal duties set out in the Conservation of Habitats and Species Regulations 2017 (known as the Habitat Regulations), all new development since has been required to demonstrate water neutrality.

On 31st October 2025 Natural England formally withdrew the 2021 Position Statement, citing a package of measures that they were satisfied would safeguard the Arun Valley sites. Principal amongst these measures is a reduction in the Southern Water abstraction licence 'by March 2026'. However, given the licence change has not yet taken place Horsham District Council, as competent authority under the Habitats Regulations, cannot yet be certain that new development will not result in adverse impacts on the Arun Valley sites.

To ensure development can come forward as water neutral in the meantime, the Council has agreed with Natural England to use the significant water savings made by Southern Water in 2024/25 through their programme of leakage reduction (amongst other measures). This has generated some 3,240,000 litres per day of water savings that can now be attributed to new development without increasing water abstraction in the Arun Valley beyond baseline. These savings were previously to be used to launch the Sussex North Water Certification Scheme (SNWCS), however following the withdrawal statement SNWCS will no longer be launching. Natural England standing advice dated 10 November 2025 raises no objection to using these savings to enable development to come forward. The standing advice clarifies that it functions as Natural England's formal response pursuant to Regulation 63(3) of the Conservation of Habitats and Species Regulations 2017 to all relevant planning applications which seek to achieve water neutrality using the above Southern Water savings.

Officers have undertaken an Appropriate Assessment which demonstrates that the anticipated increase in mains water consumption from this development, alongside all other development granted since the 31st October 2025, will not exceed 3,240,000 litres per day.

Accordingly, Officers consider that the proposed development will not have an Adverse Effect on the Integrity of the Arun Valley Site, either alone or in combination with other plan and projects, thereby complying with Regulations 63 and 70 of the Conservation of Habitats and Species Regulations 2017, HDPF Policy 31, and paragraph 193 of the NPPF.

Other Matters:

Contaminated Land:

Given the previous agricultural use, it is possible there is contaminated land present. No contaminant report was submitted with the application. Given the proposal is not supported in principle, the report was not requested by the Council for inspection by the Environmental Health department.

Climate Change:

Policies 35, 36 and 37 require that development mitigates to the impacts of climate change through measures including improved energy efficiency, reducing flood risk, reducing water consumption, improving biodiversity and promoting sustainable transport modes. These policies reflect the requirements of Chapter 14 of the NPPF that local plans and decisions seek to reduce the impact of development on climate change. The proposed development includes the following measures to build resilience to climate change and reduce carbon emissions:

- Electric vehicle charging points

Biodiversity Net Gain (BNG):

Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) mandates that every development must achieve at least a 10% Biodiversity Net Gain (BNG) (unless the development qualifies as exempt under the Biodiversity Gain Requirements (Exemptions) Regulations 2024) and that every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition that development must not be begun unless a Biodiversity Gain Plan has been submitted to the planning authority and the planning authority has approved the Plan.

The Biodiversity Gain Plan must show how the development will achieve the required minimum 10% BNG using the statutory biodiversity metric tool, and must demonstrate how the habitats will be managed and maintained for 30 years, starting from the date the development is completed. Off-site gains (on unregistered sites) and significant on-site enhancements will be secured over this period by way of a Legal Agreement.

The applicant has submitted a Biodiversity Statement with the Ecological Impact Assessment (EclA). This demonstrates a greater than 10% net gain is achievable on site. However, the specific BNG metric has not been submitted to the Council for review. The Council can therefore not inspect the metric and thus the Council is unable to verify the approach.

Given the proposal is not supported in principle, the metric was not requested by the Council for inspection.

Conclusions:

The proposal is not considered to meet all policies considered against the proposal and as such the proposed development is recommended for refusal.

Recommendation: Application Refused

Reasons for Refusal:

1. The proposal is located outside of the built-up area boundary, on a site not allocated for commercial development, and it has not been sufficiently demonstrated that the development would contribute to the diverse and sustainable farming enterprises within the district, in accordance with the Provisions of Policy 10(a) or (b) of the Horsham District Planning Framework (2015). Furthermore, the applicant has not demonstrated to the satisfaction of the Local Planning Authority that the proposal would be essential to its countryside location. The principle of development is therefore not supported, and the proposal would be contrary to Policies 10, 25 and 26 of the Horsham District Planning Framework (2015), and Policies BILL1, and BILL10 of the Billingshurst Neighbourhood Plan (2021).
2. The proposed four workshops, with unrestricted Class E use, would introduce noise and activity uncharacteristic of the rural setting, resulting in harm to the tranquillity of the countryside. The likely increase in vehicular movements arising from the anticipated employment levels associated with the workshop floorspace and the site's reliance on private car travel and would further erode the peaceful character of the area. Accordingly, the proposal is considered to

cause unacceptable harm to the amenity of the area and fails to accord with Policy 33 of the Horsham District Planning Framework (2015).

3. Insufficient information has been provided to demonstrate safe and suitable access or compliance with sustainable transport objectives as no transport statement was submitted. The isolated location would lead to a significant reliance on private car travel, with increased vehicular movements expected. As a result, the development fails to show that it accords with Policies 40 and 41 of the Horsham District Planning Framework (2015)
4. Insufficient ecological information has been provided to confirm whether the development would result in harm to protected species, particularly bats (including Barbastelle bats). In the absence of clear evidence demonstrating that potential impacts have been adequately assessed and avoided or mitigated, the Local Planning Authority cannot conclude that the proposal would safeguard biodiversity or prevent unacceptable ecological harm in conflict of Policy 31 of the Horsham District Planning Framework (2015).

POSITIVE AND PROACTIVE STATEMENT

Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received, in order to be able to, where possible, grant permission.

Plans list for: DC/26/0051

Schedule of plans/documents **not approved**:

Plan Type	Description	Drawing Number	Received Date
Supporting Statement	Arboricultural Impact Assessment & Method Statement	NONE	20.01.2026
Supporting Statement	Biodiversity Net Gain (BNG) Statement for Validation	NONE	13.01.2026
Supporting Statement	Ecological Impact Assessment (EcIA)	NONE	13.01.2026
Design & Access Statement		NONE	13.01.2026
Tree plan		19960625/TS	13.01.2026
Location plan		1639/P013	13.01.2026
Block plan		1639/P012	13.01.2026
Block plan		1639/P011 REV C	13.01.2026
Site plan		1639/P010 REV C	13.01.2026
Section plan		1639/P04	20.01.2026
Roof plan		1639/P03	20.01.2026
Elevation plan	Proposed	1639/P02 REV B	20.01.2026
Floor plan	Proposed ground	1639/P01 REV A	20.01.2026

DELEGATED

Case Officer sign/initial JBurrowes Date: 14/04/2026

Authorising Officer sign/initial RHERMITAGE Date: 12.05.2026