Horsham District Council

DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:

DC/26/0143
Hollinger, Marthas Barn Warehouse , Wheatsheaf Road, Henfield, West Sussex, BN5 9AX

DESCRIPTION:

Erection of 3 buildings (D, E & F), reposition PD Building C, provision of a formal parking and turning layout to serve all units along with dedicated internal access to land to the rear, the use of Buildings C, D & E for variable B8 and E(g) use, Building F for variable B8, E(d), and E(g) use and for all Buildings (A, B, C, D, E & F) and all units to be capable of being used independently of each other

RELEVANT PLANNING HISTORY:

DC/10/0650	Use of barn for storage, distribution and finishing of furniture (B8/B1), widening of existing access and provision of hardstanding	Application Permitted on 28.07.2012
DC/12/0650	Retrospective application to vary Condition 8 (No produce, crates, packing materials or waste shall be stacked or stored on the site except within the building) of DC/10/0650 (Use of barn for storage, distribution and finishing of furniture (B8/B1)) to say "No produce, crates, packing materials or waste shall be stacked or stored on the site except within the building or within the area immediately to the south of the barn as on shown on the storage area plan. Any external storage shall be limited to a maximum height of 3m."	Application Permitted on 11.07.2012
DC/17/1246	Proposed erection of a storage building, alterations to crossover/access and provision of 6 parking spaces	Application Permitted on 17.07.2017
DC/17/2554	Erection of storage building, alterations to crossover and access and provision of 6 parking spaces (minor amendment to previously approved DC/17/1246)	Application Permitted on 27.12.2017
DC/20/0996	Change of use of part of ground floor of existing B1/B8 commercial building to ancillary kitchen showroom (A1) with re-cladding of exterior walls and roof and replacement windows and doors.	Application Permitted on 07.10.2020
DC/22/1236	Creation of a car parking/hardstanding area for deliveries.	Withdrawn Application on 17.11.2022
DC/22/1790	Change of use of land to lorry turning and delivery area and creation of hardstanding (retrospective)	Application Refused on 12.06.2024
DC/23/2178	Exempted Camp Site - to accommodate a maximum of 5 caravans/motorhomes onsite at any one time, plus no more than 10 tents unless express permission has been granted by the Camping and Caravan Club	COMMENTS on Consultation on 11.12.2023
DC/23/2311	Change of use of land for works associated with bespoke detailing and distribution of premium vehicles. (Retrospective)	Application Refused on 12.06.2024

		Appeal Dismissed on 28.04.2025 PINs Ref: APP/Z3825/W/24/3348204
DC/25/0887	Erection of new B8 building and hard surface. (Lawful Development Certificate - Proposed).	Application Permitted on 06.08.2025
DC/25/1767	Upgrade LV conductors from 2w ABC to 4w ABC between poles 635470 and 635466 inclusive, 635471 and 635472 and the HV Conductors from 2w to 3w by replacing all the conductors and steel works between poles 617600 and 617605 inclusive.	NO OBJECT Overhead Line on 01.12.2025

DESCRIPTION OF THE SITE

The application site lies on the southern side of the B2116 / Wheatsheaf Road, approximately 1km east of the junction with the A281 Brighton Road. The site lies in a rural location but is sited within a cluster of commercial buildings and dwellings that have been developed over the past decade. The application site is accessed by its own vehicular access off the B2116 / Wheatsheaf Road.

The existing commercial use of the application site emanates from approval[1] of a Class B1/B8 use within an agricultural barn which formed part of a wider land holding associated with the neighbouring property to the east known as Hollinger. This building already had an established small-scale B1/B8 use in connection with an agricultural trenching business[2].

Further B8 uses, to be used ancillary to the main building, were approved under DC/17/1246 and DC/17/2554, (the most westerly of the buildings that exist on site).

A Lawful Development Certificate was granted[3] for the erection of a third B8 building and hard surface.

It is however acknowledged that there are active compliance investigations at the site, with the most relevant as follows:

EN/25/0148	Continued change of use of land to lorry turning and delivery area and creation of hardstanding following dismissal of appeal in relation to DC/22/1790	Pending Consideration

As such, the lawful baseline of the site is regarded as the two existing B8 buildings (identified as buildings A and B in the supporting Design and Access Statement) and building C (unimplemented). The lawful extent of hardstanding would be that it extends to the build line of neighbouring dwelling 'Hollinger'. As existing, the hardstanding extends further beyond to the south east and is the subject of the above noted Enforcement Investigation EN/25/0148.

.

DESCRIPTION OF THE APPLICATION

Planning Permission is sought for the following:

- Erection of 3 new buildings (D, E & F)
  - Building D variable B8 and E(g) use
  - Building E variable B8 and E(g) use
  - Building F variable B8, E(d), and E(g) use
- Reposition of building C (B8 use) (approved under DC/25/0887)
- Provision of a formal parking and turning layout to serve all units along with dedicated internal access to land to the rear

[1] DC/10/0650
[2] HF/32/94
[3] DC/25/0887

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 7 - Strategic Policy: Economic Growth
Policy 9 - Employment Development
Policy 10 - Rural Economic Development
Policy 11 - Tourism and Cultural Facilities
Policy 24 - Strategic Policy: Environmental Protection
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
Policy 26 - Strategic Policy: Countryside Protection
Policy 31 - Green Infrastructure and Biodiversity
Policy 32 - Strategic Policy: The Quality of New Development
Policy 33 - Development Principles
Policy 35 - Strategic Policy: Climate Change
Policy 36 - Strategic Policy: Appropriate Energy Use
Policy 37 - Sustainable Construction
Policy 40 - Sustainable Transport
Policy 41 - Parking

Henfield Neighbourhood Plan (2017 – 2031):
Policy 1: A Spatial Plan
Policy 3.2: Development of New and Existing Employment Uses
Policy 4: Transport, Access and Car Parking
Policy 12: Design Standards for New Development

Horsham District Local Plan (2023-40) (Regulation 19):
Strategic Policy 1: Sustainable Development
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 11: Environmental Protection
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
Policy 25: Parking
Strategic Policy 27: Inclusive Communities, Health and Wellbeing
Policy 28: Community Facilities, Leisure and Recreation
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)

Parish Design Statement:
Henfield Parish Design SPD Dec 2008

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:
INTERNAL CONSULTATIONS

HDC Environmental Health: Objection (16.03.26)
[Summary]
The site is located in the primarily rural area of the district, although domestic properties are positioned to the east within 5 metres of the site boundary and within 10m of the closest industrial unit. It is noted that no hours-of-operation have been proposed in the application.

It is also noted that the application is not currently supported by noise assessment or noise management plan to allow evaluation of the potential impact from the development on local amenity, including noise breakout from the operation of the industrial units or vehicle movements at the site.
To this end, this Service OBJECTS to the application due to inadequate consideration of the potential for noise disturbance. The Applicant should support the application with a noise assessment undertaken in accordance with BS 4142, to demonstrate that no adverse impact resulting in loss of amenity will affect neighbouring domestic properties from the development.

Specifically, this Service would require that operational and vehicle noise from the site, for the life of the development, shall not exceed background levels as measured at a position on the eastern boundary of the application site adjacent to the dwelling at Green Oaks Barn. Daytime and night-time noise measurements are to be based on a 1 hour LAeq and a 15 Minute LAeq respectively, in line with BS 4142: 2014+A1:2019 (or subsequent superseding equivalent).

HDC Landscape Architect: Objection (26.03.26)
[Summary]
There is currently insufficient information to enable a full review and assessment of the proposed development in relation to its potential landscape impacts. Based on the information provided, we consider that the proposal fails to demonstrate how it will be assimilated into the rural character of the existing landscape without major concerns.

We request further assessment of the baseline landscape character and visual qualities is undertaken and submitted, which should then inform any development on site. We anticipate that further landscaping will be required on the southern and western boundaries to reduce visual impacts and mitigate any landscape effects.

OUTSIDE AGENCIES
Southern Water: No Objection (24.02.2026)
[Summary]
Subject to conditions

WSCC Highways: Comment (18.03.2026)
[Summary]
Further information is required prior to the LHA fully assessing the highway safety and capacity aspects of the scheme:

- *Considering the increase in floorspace at the site and thus staff and some visitors may choose to use PROW networks nearby to travel to and from site – applicant should explore provision of linking footway on Wheatsheaf Road to these PROW.*
- *Clarify whether formal Travel Plan Statement will be provided.*
- *Vehicular visibility splays from site access to Wheatsheaf Road and forward visibility splay on Wheatsheaf Road require updating along with plotting of trees in splays.*
- *Existing vehicle movements for Building A and B should be set out (peak hours and over day) and clearly set out anticipated increase from existing to proposed.*

- *Further justification on car parking and bicycle parking provision, consideration of additional accessible bay and motorcycle parking.*

PUBLIC CONSULTATIONS:

Representations:

12 letters of Objection have been received from 9 addresses, objecting to the application on the following grounds:

- Objections are raised to the principle of the development, noting that the site lies outside any defined built-up area boundary within open countryside.
- The proposal represents inappropriate development in a rural location, conflicting with Policy 26 of the Horsham District Planning Framework (HDPF) and Policy 3.2 of the Henfield Neighbourhood Plan
- The proposed commercial uses are not essential to a countryside location and would result in an unjustified intensification of development.
- The site is in a remote location with limited access to services, public transport, or non-car modes of travel
- The introduction of additional buildings, hardstanding, and a formalised layout would urbanise the site and erode the intrinsic character of the countryside
- Visually intrusive and out of keeping
- Overdevelopment of the site through the cumulative addition of multiple buildings (A–F), increased hardstanding
- Would effectively create a small industrial estate in a rural location
- The development would generate a significant increase in vehicle movements, including HGVs, on Wheatsheaf Road
- Concerns regarding existing drainage issues in the area. No supporting drainage information is provided.
- Loss of greenfield land and associated wildlife habitat.
- The proposal would result in a net loss of biodiversity
- Potential loss of trees and vegetation
- Existing natural screening has been reduced
- Proposed screening would not offset the impacts of development
- Concerns regarding the flexibility of the proposed uses
- This would lead to less controllable activity levels with associated impacts on amenity, traffic and character
- Objectors dispute the weight that should be given to the identified fallback position, noting that the lawful development relates to a single B8 building and associated works. It is argued that the current proposal represents a materially different and more intensive form of development, and that the fallback does not justify the scale of the scheme.
- Concerns are raised regarding alleged unauthorised development on the site, including hardstanding, and references are made to ongoing enforcement investigations. Objectors consider that it would be premature to determine the application prior to the resolution of these matters.

The following matters have also been raised but are not material planning considerations:

- Allegations regarding inconsistency or “double standards” in decision-making by the Local Planning Authority
- Reference to unrelated planning applications submitted by third parties
- Generalised objections to development or industrial uses not supported by policy-based reasoning

1 letter of Support has been received from Oakley Property Experts. The letter summarises that

- The development proposed will allow for the demand in the locality and wider market to offer space to local and out-of-town businesses to move into much required space to either grow as a business or to set up;

- If approved it will prove to be a popular development, similar to other sites locally and satisfy demand seen in Horsham and further afield.

Parish Comments:

Henfield Parish Council: Objection (16.03.26)

This Committee deems that this application is contrary to HDC Planning Framework policies:-

- 2 as it is not a nominated site in the Neighbourhood Plan (and there are already two far more appropriate sites nominated as employment/economic development sites (in the more industrialised area of Henfield Business Park) which have not yet been developed).
- 26 as the site lies outside built-up area boundaries and does not provide for quiet informal recreational use or enable the sustainable development of a rural area, this proposal is not of a scale appropriate to its countryside character and location.
- 33.2 as there is loss of amenity to the neighbouring property; or the design is not sensitive to surrounding buildings
- 33.3 as the scale and massing and appearance of the proposal is out of keeping and unsympathetic with the built surroundings.
- 33.4 in that it does not respect the character of the surrounding area and buildings.

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

Principle of Development:

The application site is located beyond a defined built-up area, therefore constituting a countryside location for the purposes of planning policy in accordance with paragraph 4.7 of the Horsham District Planning Framework (HDPF) (2015), and where countryside protection policy set-out at HDPF policy 26 applies.

In this context, in accordance with HDPF policy 26, it would be expected that development be essential to this countryside location and not lead to a significant increase in overall activity on an individual or cumulative basis. Essential development under HDPF 26 is considered to involve works supporting the needs of agriculture or forestry, mineral extraction or waste disposal, quiet recreational use or sustainable development of rural areas. One of the criteria of HDPF policy 26 is that suitable proposals must be of a scale appropriate to its countryside character and location, and would be considered acceptable where they do not ‘lead, individually or cumulatively, to a significant increase in the overall activity in the countryside, and protects, and/or conserves, and/or enhances, the key features and characteristics of the landscape character area in which it is located.

HDPF policy 10 accepts that sustainable rural economic development and enterprise within the district is necessary and can bring social, economic and environmental benefits. However, against this, it is

essential that for any development to be acceptable in such locations, the appropriate re-use of existing buildings is first considered, and in the case of established rural industrial sites, lies within the existing boundaries thereof.

Policy 1 of the Henfield Neighbourhood Plan (HNP) (2021) operates to support the spatial strategy of the development plan in seeking to support development beyond defined settlement boundaries where appropriate in location to national and local planning policy. Policy 3.2 of the Henfield Neighbourhood Plan does offer support for extensions to or intensifications of, existing employment uses, but only if they are within the defined BUAB of Henfield; or in locations outside of the BUAB, would be accommodated within the existing curtilage of the existing employment site, would have acceptable access to the principal Henfield Road network (A281 / A2037), would meet relevant car parking standards and would be able to minimise the visual impacts on the street-scene, local amenity or adjoining rural countryside.

The lawful use of the site originates from the use of the original agricultural barn for B1/B8 purposes associated with the storage, distribution and finishing of furniture, with subsequent permissions allowing for an additional ancillary storage building and ancillary showroom use. As confirmed by the recent appeal decision dated 28 April 2025, the commercial use of the site is subject to a number of planning conditions which tightly control its scale and nature, including restrictions tying the use to the primary furniture business and preventing the introduction of independent commercial uses.

The Inspector identified that the lawful commercial use of the site is “compact” and relates well to its surroundings, with a defined and limited commercial curtilage. Importantly, it was found that this curtilage extends only a short distance to the rear of the buildings, broadly aligning with the rear of the adjacent dwelling at Hollinger, beyond which land remains part of the open countryside.

The Inspector further noted that, notwithstanding the applicant’s wider land ownership, commercial activities extending southwards beyond this defined area represent encroachment into open countryside and materially alter the character of the site.

The current proposal, similar in principle to the previously refused and dismissed schemes, involves development extending beyond the established and lawful commercial curtilage into land that has historically formed part of an open grassed field.

In the appeal decision, the Inspector concluded that such southward encroachment, including hardstanding, commercial activity, and associated paraphernalia, resulted in a harmful urbanising effect, significantly eroding the open and undeveloped character of the countryside. This encroachment was found to conflict with Policies 10 and 26 of the HDPF and Policy 3.2 of the HNP. The Inspector attributed significant weight to this harm, concluding that it was not outweighed by the economic benefits associated with the proposals. This finding is a highly material consideration and carries substantial weight in the determination of the current application.

Since the appeal decision, a Lawful Development Certificate (DC/25/0887) has confirmed that a single B8 warehouse building (198sqm) with associated hardstanding could be constructed under permitted development rights. This fallback position is a material consideration. However, it is limited in scope and nature. The lawful fallback comprises:

- A single building of modest scale;
- Development that must take place within the curtilage of the existing industrial building;
- Use restricted to purposes incidental to the existing undertaking.

The fallback does not represent the establishment of a wider industrial estate, nor does it facilitate multiple independent commercial uses or a materially intensified level of activity across the site.

As such, while the fallback attracts some weight, it does not justify or equate to the scale, form, and intensity of development proposed under the current application, particularly where this extends beyond the established commercial envelope identified by the Inspector.

In light of the above, the proposal represents an extension and intensification of commercial activity beyond the established and lawful curtilage of the site, into open countryside. This form of development is not essential to a countryside location and would result in a significant increase in activity and a harmful urbanising encroachment into the rural landscape.

The proposal therefore conflicts with Policy 26 of the HDPF. Furthermore, it fails to comply with Policy 10, as it does not prioritise the use of existing buildings or remain within the established employment site, and conflicts with Policy 3.2 of the Henfield Neighbourhood Plan, which requires such development to be contained within the existing curtilage.

Accordingly, the principle of the development is not supported by the development plan, and the identified conflict is reinforced by the conclusions of the recent appeal decision.

Design and Appearance

Policies 25, 32 and 33 of the HDPF require development to be of a high standard of design and layout. Development proposals must be locally distinctive in character and respect the character of their surroundings. Where relevant, the scale, massing and appearance of development will be required to relate sympathetically with its built-surroundings, landscape, open spaces and to consider any impact on the skyline and important views.

The proposal seeks the erection of four new buildings (Buildings C–F), comprising a series of portal-framed structures of substantial footprint and height. Building C (198sqm), previously confirmed as lawful under permitted development (DC/25/0887), would be re-orientated, with three additional buildings (D, E and F) proposed alongside it. Collectively, the buildings would result in a significant quantum of additional built form extending across the southern part of the site. The dimensions of these are as follows:

Building	Height (Eaves)	Height (Ridge)	Length	Depth	GEA (m^2)
C	5.2	6.2m	22	9	198
D	5.2	6.2m	22	9	198
E	4.9	6.2	18	9	162
F	3.0	4.9	29	7	203

Whilst Buildings C and D would each measure approximately 22m in length with ridge heights of 6.2m, Building E would measure 18m in length and Building F would extend to approximately 29m in length. The cumulative footprint and disposition of these buildings would introduce a substantial block of built development across an area that has historically formed part of an open and undeveloped field.

As identified within the recent appeal decision, the lawful commercial use of the site is characterised by a compact form of development, closely related to the existing buildings and limited in its southward extent. The introduction of additional buildings in this location would extend built form well beyond this established envelope, resulting in a pronounced encroachment into the open countryside.

The layout and disposition of the proposed buildings would fundamentally alter the spatial character of the site. Rather than maintaining the existing farmstead-like arrangement of buildings focused around a courtyard to the frontage, the proposal would create a more expansive and fragmented pattern of development extending into the field to the south. This would erode the clear distinction between the developed part of the site and the surrounding rural landscape.

In visual terms, the scale, massing and spread of the proposed buildings, alongside the associated hardstanding, vehicle movements and general activity, would give rise to a markedly more urban and industrial character. The presence of multiple large structures, together with the likely associated paraphernalia of commercial use, would significantly diminish the openness of the site and introduce built form that is incongruous with the prevailing pattern of sporadic and low-density development in the surrounding countryside.

The application proposes a landscape buffer to the east, adjacent to Hollinger. However, as previously identified, the effectiveness of such measures is limited. The presence of built form of this scale and

extent cannot be adequately mitigated through landscaping alone, particularly in the short to medium term. Furthermore, concerns remain regarding the implementation and retention of landscaping, given the site's planning history and previous non-compliance with landscape conditions.

Even if successfully implemented, landscaping would not overcome the fundamental harm arising from the encroachment of built development into an area that presently contributes to the wider open and agrarian character of the landscape. The introduction of multiple buildings, together with associated activity, would result in a permanent and irreversible change to the character of the site.

Accordingly, it is considered that the proposal would result in a significant and harmful erosion of the rural character and appearance of the site and its surroundings. The development would fail to respect the established character of the area and would not be sympathetic to its landscape setting.

The proposal is therefore contrary to Policies 25, 32 and 33 of the Horsham District Planning Framework and the relevant provisions of the National Planning Policy Framework, which seek to ensure that development contributes positively to local character and conserves and enhances the natural environment.

Landscape:

Policy 26 of the Horsham District Planning Framework (HDPF) seeks to protect the rural character and undeveloped nature of the countryside, requiring development to conserve and enhance the key characteristics of the landscape, including its openness, pattern of fields and vegetation, and sensitivity to change. This is supported by Policies 25, 31, 32 and 33 of the HDPF, which require development to be of a high standard of design, integrate with its landscape setting, and contribute positively to the natural environment. At a neighbourhood level, Policies 3.2, 10 and 12 of the Henfield Neighbourhood Plan require that development outside the built-up area is appropriately contained, responds to its rural context, and is supported by effective landscaping that protects visual amenity and the wider countryside.

The application site is located within open countryside to the north-west of Henfield and is characterised by a predominantly open and agrarian landscape, comprising a patchwork of fields bounded by hedgerows, trees and sporadic built development. The site currently comprises a small cluster of buildings and associated hardstanding, with the land to the south forming part of a wider open field which contributes positively to the rural character of the area. Public Rights of Way are located in close proximity to the site, including routes to the east and west, increasing the sensitivity of the site in visual terms.

The proposed development would introduce a series of additional buildings (C–F), together with associated hardstanding, access and parking areas, extending built form and activity further into the open countryside beyond the established and lawful extent of development. The cumulative scale, layout and disposition of these buildings would result in a significant encroachment into the adjoining field, eroding its openness and altering the simple and undeveloped field pattern that is characteristic of the area.

The Council's Landscape Advisor (Place Services) has raised concerns that insufficient information has been submitted to enable a full assessment of the landscape and visual impacts of the proposal. In particular, no Landscape and Visual Appraisal (LVIA) has been provided to assess the effects of the development on the character of the landscape or on receptors, including users of nearby Public Rights of Way. Furthermore, the submitted plans provide only limited detail in respect of landscaping, with minimal provision shown along the site boundaries, particularly to the south and west where the site is most exposed to the wider countryside.

In the absence of a robust assessment and detailed landscaping proposals, it has not been demonstrated that the development can be satisfactorily assimilated into the landscape. The limited and fragmented planting proposed would be insufficient to mitigate the visual impact of multiple large-scale buildings positioned in close proximity to site boundaries. This is particularly the case given the elevated height and bulk of the proposed structures, which would be visible in both near and medium-distance views, especially from nearby Public Rights of Way.

Even if additional landscaping were to be secured, it is considered that this would not overcome the fundamental harm arising from the scale and extent of built development proposed. As identified by the Planning Inspector in the recent appeal decision, development extending into this part of the site results in an urbanising encroachment into the rural landscape, eroding its open and undeveloped character. The current proposal would reinforce and intensify this harm through the introduction of further built form and associated activity.

In addition, insufficient information has been provided in respect of the detailed design, materials and colour treatment of the proposed buildings. The landscape advisor has recommended that an Environmental Colour Assessment be undertaken to ensure that materials and finishes respond appropriately to the surrounding landscape. In the absence of such information, it cannot be concluded that the development would integrate sympathetically with its rural setting.

Accordingly, the proposal fails to demonstrate that it would conserve or enhance the character and appearance of the countryside and would instead result in a harmful and urbanising form of development that is not adequately mitigated. The proposal is therefore contrary to Policies 25, 26, 31, 32 and 33 of the Horsham District Planning Framework, and Policies 3.2, 10 and 12 of the Henfield Neighbourhood Plan.

Residential Amenity:

Policy 32 of the Horsham District Planning Framework (HDPF) requires development to achieve a high standard of amenity for existing and future occupiers, ensuring that it does not result in unacceptable harm through noise, disturbance, overlooking, overshadowing or other adverse impacts. This is supported by paragraph 135(f) of the National Planning Policy Framework (NPPF), which seeks to secure a high standard of amenity for existing and future users of land and buildings.

The application site lies immediately adjacent to a small cluster of residential properties to the east, including Hollinger and Green Oaks Barn, with the nearest residential curtilage located approximately 5 metres from the site boundary and within close proximity (circa 10 metres) of the nearest proposed and existing buildings. Additional residential receptors are located approximately 100 metres to the west. The proximity of Hollinger and Green Oaks Barn to the site renders them highly sensitive to changes in activity and intensity of use.

Whilst the proposal would not give rise to material harm in terms of overlooking, loss of privacy or overshadowing, it would result in a significant intensification and expansion of commercial activity across the site. In particular, the erection of additional buildings (C–F), the formalisation of parking and turning areas, and the introduction of flexible B8, E(g) and E(d) uses across multiple units would facilitate a materially higher level of activity than the existing lawful baseline.

This intensified activity would extend further into the site, including areas which have historically remained open and undeveloped and have not been subject to lawful commercial use. The likely associated operations, including general commercial processes, comings and goings of vehicles (including potentially large goods vehicles), loading and unloading, and general external activity, would introduce a materially greater level of noise and disturbance in close proximity to neighbouring residential properties.

The Council's Environmental Health Officer has raised a formal objection to the proposal on the basis that insufficient information has been provided to assess the potential noise impacts. In particular, no noise impact assessment or noise management plan has been submitted to evaluate the effects of operational noise, vehicle movements or noise breakout from the proposed units. Furthermore, no details of proposed hours of operation have been provided.

Given the rural context of the site, where background noise levels are likely to be low, the introduction of an intensified industrial-style use has the potential to result in significant adverse impacts on residential amenity. The Environmental Health Officer has advised that, in order to demonstrate acceptability, a noise assessment undertaken in accordance with BS 4142:2014+A1:2019 would be

required, with operational and vehicle noise not exceeding background levels when measured at the site boundary adjacent to the nearest residential receptors.

In the absence of such assessment, the Local Planning Authority cannot be satisfied that the proposal would not result in unacceptable levels of noise and disturbance to neighbouring occupiers. Given the close proximity of residential properties—particularly to the eastern boundary—the risk of harm is considered to be significant.

Moreover, the nature of the proposed flexible uses across multiple units, combined with the absence of defined operating parameters, introduces a high degree of uncertainty regarding the intensity, timing and character of activities on site. This further undermines the ability to appropriately assess and mitigate impacts on neighbouring amenity.

It is not considered that the identified harm could be adequately controlled through the use of planning conditions in the absence of a supporting noise assessment, as there is insufficient evidence to establish an appropriate baseline or to determine suitable mitigation measures.

Accordingly, the proposal fails to demonstrate that it would safeguard the amenity of neighbouring residential occupiers and is therefore contrary to Policy 32 of the Horsham District Planning Framework and paragraph 135(f) of the National Planning Policy Framework.

Highways Impacts:

Policy 40 of the HDPF states that transport access and ease of movement is a key factor in the performance of the local economy. The need for sustainable transport and safe access is vital to improve development across the district. This is supported by paragraph 116 of the National Planning Policy Framework (NPPF), which states that development should only be refused on highways grounds where there would be an unacceptable impact on highway safety or where the residual cumulative impacts on the road network would be severe.

Policy 41 of the HDPF stipulates that development must provide adequate parking and facilities to meet the needs of anticipated users, with consideration given to the needs of cycle parking, motorcycle parking and electric/low emission vehicles.

West Sussex County Council, in its capacity as Local Highway Authority (LHA), have been consulted on proposals. The application is supported by a Transport Statement.

The application site is accessed via Wheatsheaf Road (B2116), a rural road subject to the national speed limit (60mph) with no footways. The site currently benefits from an established access, which has previously been upgraded under planning permission DC/17/2254, including widening and improved junction radii. The surrounding highway network is rural in character, with limited opportunities for sustainable transport, and users of the site are therefore likely to be predominantly reliant on private vehicles.

The proposal seeks to intensify the use of the site through the erection of additional buildings (C–F), flexible commercial uses, and the creation of a formalised parking and turning layout. The submitted Transport Statement (TS) indicates that the development could generate between 72 and 298 vehicle movements per day, with peak hour flows of up to 31 movements in the AM peak and 36 in the PM peak. However, the Local Highway Authority (LHA) has identified that the TS does not clearly establish the existing baseline vehicle movements associated with the lawful use of Buildings A and B. As such, it has not been demonstrated what the net increase in traffic movements arising from the proposal would be.

In the absence of this information, the Local Planning Authority cannot properly assess the impact of the development on the capacity or safety of the local highway network. The LHA has advised that clarification of baseline and proposed trip generation is necessary in order to determine whether a Road Safety Audit (RSA) is required and to assess whether the increase in vehicle movements would give rise to material harm.

In addition, concerns have been raised in relation to the visibility splays at the site access. The submitted plans do not reflect the correct visibility requirements based on recorded vehicle speeds, and it has not been demonstrated that adequate visibility can be achieved in both directions. The presence of existing vegetation, including an oak tree within the required splay, has not been adequately addressed. Given the proposed intensification of the site and the increase in vehicle movements, it is essential that safe and policy-compliant visibility splays are demonstrated. In the absence of accurate drawings and supporting evidence, the Local Planning Authority cannot be satisfied that the access arrangements would operate safely.

The internal layout of the site has also been subject to review. Whilst swept path analysis demonstrates that larger vehicles can manoeuvre within the site, the proposed access road to the rear is of a substandard width for two-way vehicle movements, relying instead on passing places. Whilst this may not in itself give rise to a severe highway safety concern, it raises questions regarding the operational efficiency and functionality of the site, particularly given the scale and intensity of the proposed uses.

In respect of parking provision, the LHA has identified inconsistencies and insufficient justification within the submitted details. Whilst 58 car parking spaces are proposed across the site, the maximum potential requirement—based on the most intensive use scenarios—could be up to 66 spaces. Furthermore, the level of accessible parking falls below the standards set out in West Sussex County Council guidance, and further clarification is required in respect of both cycle parking provision and parking associated with existing buildings on the site.

The site is located in an area with very limited accessibility by sustainable modes of transport. There are no footways along Wheatsheaf Road, and whilst Public Rights of Way exist nearby, no provision has been made to connect the site to these routes. The LHA has recommended that opportunities to improve connectivity to the Public Rights of Way network should be explored. In addition, no Travel Plan or equivalent strategy has been submitted to demonstrate how reliance on private vehicle use could be minimised.

Overall, the Local Highway Authority has advised that further information is required to fully assess the application, including clarification of trip generation, updated visibility splays, and justification of parking provision. In the absence of this information, the Local Planning Authority cannot be satisfied that the proposal would not result in an unacceptable impact on highway safety or the operation of the local road network.

Accordingly, the proposal fails to demonstrate compliance with Policy 40 of the Horsham District Planning Framework and paragraph 115 of the National Planning Policy Framework and is therefore unacceptable on highway grounds.

Ecology:

Policy 31 of the Horsham District Planning Framework (HDPF) requires development to conserve and enhance biodiversity, ensure that protected species and habitats are not harmed, and to deliver appropriate mitigation and, where possible, net gains for biodiversity. This is supported by paragraphs 187 and 193 of the National Planning Policy Framework (NPPF), which require planning decisions to minimise impacts on biodiversity and provide measurable net gains. Where there is a reasonable likelihood of protected species being present, up-to-date ecological information is required to inform the decision-making process.

The application site lies within a rural context, with boundaries that are partially open to the wider agricultural landscape and in proximity to features such as hedgerows, trees and Public Rights of Way, all of which may provide ecological value and habitat connectivity. Notwithstanding this, no ecological survey, Preliminary Ecological Appraisal (PEA), or biodiversity assessment has been submitted in support of the application.

It is acknowledged that part of the site has been subject to the laying of hardstanding, which is currently under investigation by the Council through a separate enforcement process. However, the presence of existing hardstanding does not negate the requirement to properly assess the ecological value of the site, including any remaining habitats, boundary features, and the potential for protected or notable

species to be present. Furthermore, the proposal seeks to formalise and intensify the use of the site, including the erection of additional buildings and further operational activity, which may give rise to additional ecological impacts beyond those associated with the existing unauthorised works.

In the absence of a robust ecological assessment, the Local Planning Authority cannot determine the baseline ecological conditions of the site, nor assess the potential impacts of the development on habitats, species, and ecological networks. It is also not possible to establish whether protected species may be affected, or to identify appropriate mitigation, compensation or enhancement measures. Additionally, no information has been provided in respect of biodiversity net gain, as now required by national policy and legislation.

The lack of ecological information is particularly significant given the site's rural location and its relationship with the surrounding landscape, where ecological receptors are likely to be present and potentially sensitive to change. The Council is therefore unable to conclude that the proposal would not result in harm to protected species and habitat.

It is not considered that this matter could be adequately addressed through the use of planning conditions, as the absence of baseline survey information prevents a proper understanding of the impacts of the development and the identification of suitable mitigation measures at the decision-making stage.

Accordingly, the proposal fails to demonstrate that it would conserve and enhance biodiversity and is therefore contrary to Policy 31 of the Horsham District Planning Framework and paragraphs 193 of the National Planning Policy Framework.

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.

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 Metric which states that the proposed development will result in a net loss of 0.91 habitat units. In order to deliver 10 % net gain under the current scheme it will be necessary to secure 1.08 habitat units from an off site source.

The report indicates that the proposed development would deliver a biodiversity net gain through off-site measures, and primarily the purchase of habitat units. Should the application be considered acceptable in all other regards, this matter would have been addressed by the statutory condition.

Other Matters

A representation has been received raising concerns that part of the land within the application site, particularly along the eastern boundary, may fall outside the ownership of the applicant.

The application has been submitted with Certificate A under Article 14 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, which certifies that the applicant is the owner of all land within the application site as defined by the red line boundary.

In light of the representation received, the Local Planning Authority sought clarification from the applicant's agent regarding land ownership. The agent has subsequently confirmed in writing, on behalf of the applicant, that all land within the red line application site is within the applicant's ownership and that Certificate A has been correctly completed on that basis.

The Local Planning Authority notes that it is not within its remit to determine disputes relating to land ownership or boundary positions. Such matters are private legal issues between the relevant parties. The role of the Authority is limited to ensuring that the appropriate ownership certificate has been completed in accordance with the requirements of the above legislation.

On the basis of the written confirmation provided by the applicant's agent, the Local Planning Authority has proceeded on the basis of the ownership certificate as submitted.

The issue of land ownership is not a material planning consideration and does not affect the assessment of the application.

Planning Balance and Conclusion

The proposed development seeks to intensify the use of the site through the erection of additional commercial buildings (C–F), the formalisation and expansion of hardstanding, and the introduction of flexible industrial and commercial uses capable of operating independently across the site. Whilst it is acknowledged that the proposal would result in some economic benefits through the provision of

additional employment floorspace and associated job creation, these benefits are limited in scale and are not considered to outweigh the identified harms.

The site lies within the countryside, outside of any defined built-up area boundary, where policies seek to protect the intrinsic character and beauty of the rural area. In this regard, Policies 25, 26, 32 and 33 of the Horsham District Planning Framework require development to respond positively to landscape character, maintain openness, and avoid the encroachment of urbanising forms of development into rural areas. Paragraphs 135 and 210 of the National Planning Policy Framework similarly require development to be sympathetic to local character and to ensure a high standard of amenity for existing and future users.

In this case, the proposal would result in a significant intensification and urbanisation of a currently transitional rural site through the introduction of large-scale built form, extensive hardstanding, and associated commercial activity extending further into an area that has historically remained open and undeveloped.

Furthermore, the proximity of the site to neighbouring residential properties—particularly those immediately adjoining the eastern boundary—gives rise to concerns in respect of residential amenity. The proposed scale and flexibility of uses, combined with the lack of any noise assessment or mitigation strategy, fails to demonstrate that the development would not result in unacceptable levels of noise and disturbance.

In addition, insufficient information has been provided to fully assess the transport impacts of the development. In particular, the absence of clarity regarding trip generation, visibility splays, and parking provision prevents the Local Planning Authority from concluding that the development would operate safely or without detriment to the local highway network.

Finally, the absence of ecological survey information, particularly in the context of unauthorised works and the formalisation of hardstanding, prevents a proper assessment of impacts on biodiversity and fails to demonstrate measurable biodiversity net gain as required by national policy.

Taken together, these harms are significant and demonstrable. The economic benefits associated with the proposal do not outweigh the identified adverse impacts. The proposal therefore conflicts with the development plan when read as a whole, and there are no material considerations that indicate a decision should be taken other than in accordance with it.

Recommendation: Application Refused

Reasons

1 The proposed development, by reason of the scale, siting and cumulative extent of built form, hardstanding and commercial activity, would result in the urbanisation and erosion of the rural character of the site and its surroundings. The proposed development would fail to protect, conserve and enhance the key features and characteristics of the landscape character area in which it is located. The development is therefore contrary to Policies 25, 26, 32 and 33 of the Horsham District Planning Framework, Policies 10 and 12 of the Henfield Neighbourhood Plan, and paragraphs 135 and 210 of the National Planning Policy Framework.

2 It has not been demonstrated to the satisfaction of the Local Planning Authority that the proposed development, due to the nature of uses, scale and level of activity, and proximity to nearby residential properties, would not result in unacceptable levels of noise and disturbance. The proposal therefore fails to demonstrate that it would safeguard the amenity of neighbouring occupiers, contrary to Policies 25 and 33 of the Horsham District Planning Framework and paragraph 135 of the National Planning Policy Framework.

3 Insufficient information has been provided in respect of trip generation, existing and proposed traffic movements, visibility splays, and parking provision. It has not therefore been demonstrated to the satisfaction of the Local Planning Authority that the proposed development

would benefit from safe and adequate access, and would not result in unacceptable impact on highway safety or severe residual cumulative impacts on the road network, contrary to Policy 40 of the Horsham District Planning Framework and paragraph 116 of the National Planning Policy Framework.

4 Insufficient information has been provided to demonstrate that the proposed development would have no adverse impact on protected species and its habitat, and to establish how the development will contribute to measurable Biodiversity Net Gain, contrary to Policy 31 of the Horsham District Planning Framework (2015) and Paragraph 193 of the National Planning Policy Framework.

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/26/0143
Schedule of plans/documents **not approved**:

Plan Type	Description	Drawing Number	Received Date
Location plan	Location Plan	1891.3/01	28.01.2026
Site plan	Block Plan	1891.3/02	28.01.2026
Elevation & Floor plan	Floor Plan and Elevations of Building C	1891.3/03	11.02.2026
Elevation & Floor plan		1891.3/04	28.01.2026
Floor plan	Floor Plans of Buildings E & F	1891.3/05	28.01.2026
Elevation plan	North and South Elevations of Buildings E & F	1891.3/06	28.01.2026
Elevation plan	East and West Elevations of Buildings E & F	1891.3/07	28.01.2026
Plans	Baseline Habitat	NONE	28.01.2026
Plans	Proposed Habitat Map	NONE	28.01.2026
Elevation & Floor plan	Floor Plan and Elevations of PD B8 Building	1831.3/03	28.01.2026

DELEGATED

Case Officer sign/initial Daniel Holmes Date: 27/03/2026

Authorising Officer sign/initial Guy Everest Date: 15.04.2026