

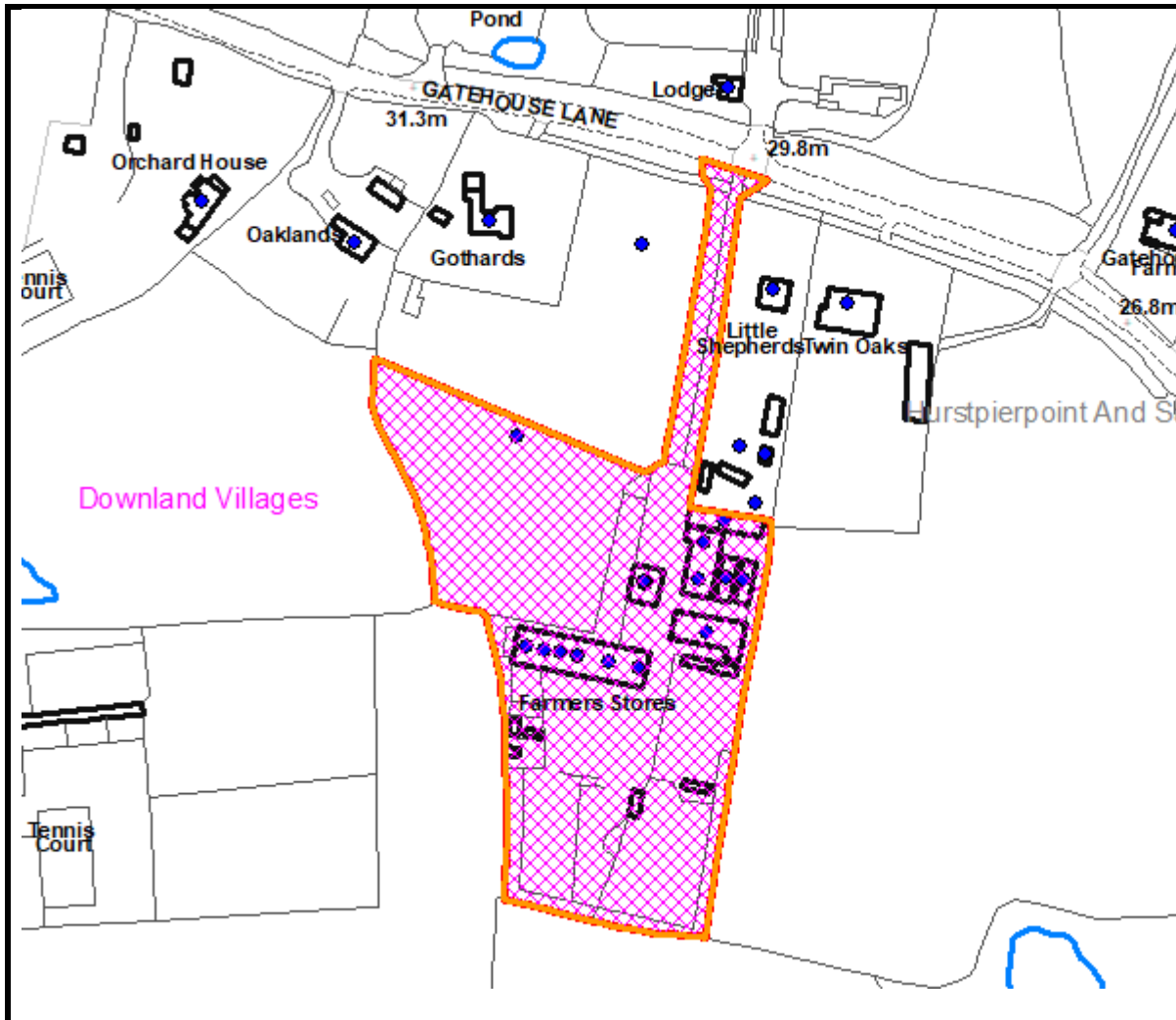
District Planning Committee



Recommended for Permission

10th August 2023

DM/23/1051



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Site:	The Farmers Stores Gatehouse Lane Goddards Green West Sussex BN6 9LE
Proposal:	Proposed mixed used commercial park including a wellness centre Class E(d) and 19 units for Class E(g), B2 or B8 uses.
Applicant:	Mr Ben Ellis
Category:	Largescale Major Other
Target Date:	17th August 2023

Parish:	Hurstpierpoint And Sayers Common
Ward Members:	Cllr Geoff Zeidler /
Case Officer:	Susan Dubberley

Link to Planning Documents:

<https://pa.midsussex.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=RT9N9JKT04L00>

1.0 Purpose of Report

1.1 To consider the recommendation of the Assistant Director for Planning and Sustainable Economy on the application for planning permission as detailed above.

2.0 Executive Summary

2.1 This application seeks full planning permission for a proposed mixed used commercial park including a wellness centre Class E(d) and 19 units for Class E(g), B2 or B8 uses.

2.2 The proposal would redevelop an existing poor quality employment site and would bring forward high quality, fit for purpose commercial units, along with a Wellness Centre.

2.3 Planning legislation holds that the determination of a planning application shall be made in accordance with the Development Plan unless material considerations indicate otherwise.

Specifically, Section 70 (2) of the Town and Country Planning Act 1990 states:

'In dealing with such an application the authority shall have regard to:

- a) The provisions of the development plan, so far as material to application,*
- b) And local finance considerations, so far as material to the application, and*
- c) Any other material considerations.'*

2.4 Section 38(6) Planning and Compulsory Purchase Act 2004 provides:

'If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.'

2.5 In this part of Mid Sussex the development plan comprises the District Plan, the Site Allocations DPD and the Hurstpierpoint and Sayers Common Neighbourhood Plan.

2.6 In making an assessment as to whether the proposal complies with the development plan, the Courts have confirmed that the development plan must be considered as a whole, not simply in relation to any one individual policy. It is therefore not the case that a proposal must accord with each and every policy within the development plan.

2.7 The development lies in the countryside, outside of the built-up area and therefore the development needs to be assessed against policy DP12 of the District Plan. Development can be permitted where it maintains or enhances the quality of the rural

landscape character of the District, and it is supported by a policy reference elsewhere in the DP, a development plan document or a neighbourhood plan.

- 2.8 In this case the proposal is supported by a Development Plan Document. The site is identified as an existing employment site in the Site Allocations DPD for Use Classes: E(g) (Business/Light Industrial), B2 (General Industrial) and B8 (Storage and Distribution) under policy SA34 (Existing Employment Sites – Protection, Intensification and Redevelopment).
- 2.9 Policy SA34 supports the expansion of Existing Employment Sites for E(g)/B2/B8 uses. The 19 industrial units would be used for classes, E(g) (Business/Light Industrial), B2 (General Industrial) and B8 (Storage and Distribution) and would therefore comply with the requirements of policy SA34, also making efficient use of existing employment land. The proposed wellness centre, however would fall under use class E(d),(indoor sport, recreation or fitness) and therefore falls outside of the uses supported by SA34.
- 2.10 The Wellness Centre use is within the NPPF definition of a ‘main town centre use’, for which a sequential test would normally be required to accord with the Framework. In respect of the Wellness Centre, account needs also be taken of the potential impact on the nearby centre of Burgess Hill. However, following the submission of further information by the applicant, it is considered that proposed wellness centre would operate as an integral, ancillary element of the development as a business hub, and therefore a sequential test would not apply.
- 2.11 As an integral, ancillary element of the scheme, it is considered that the Wellness Centre is unlikely to adversely affect the vitality and viability of the Burgess Hill Town centre. It is also noted that the design of the wellness centre would lend itself to conversion to an industrial use should the leisure use cease in the future. Therefore, it is considered that this aspect of the proposal can be supported.
- 2.12 The principle of the development is therefore acceptable.
- 2.13 The proposed design, layout and scale of the development is considered acceptable, and it would not cause harm to the character and appearance of the area or countryside. It is not considered to cause significant harm to the neighbouring amenities.
- 2.14 There will be a neutral impact in respect of highway safety, drainage, contamination, and there will be no likely significant effect on the Ashdown Forest SPA and SAC.
- 2.15 The application is thereby considered to comply with policies DP1, DP12, DP17, DP20, DP21, DP26, DP29, DP39, and DP41 the District Plan, policy SA34 and policy SA38 of the SADPD, policy Countryside HurstC1 of the Neighbourhood Plan, The Mid Sussex Design Guide SPD and the relevant provisions of the NPPF.

3.0 Recommendation

- 3.1 It is recommended that planning permission be approved subject to the conditions set in Appendix A.

4.0 Summary of Representations

- 4.1 None

5.0 Summary of Consultees

- 5.1 **MSDC Drainage Engineer:** No objection subject to conditions.
- 5.2 **WSCC Lead Local Flood Authority:** Under local agreements, the statutory consultee role under surface water drainage is dealt with by Mid-Sussex Council's Flood Risk and Drainage Team.
- 5.3 **Environmental Health- Protection:** No objection subject to conditions.
- 5.1 **Environmental Health-Contaminated Land:** No objection subject to conditions.
- 5.2 **Urban Designer:** In principle proposal is acceptable, however it's worth mentioning that there are number of things that are not addressed, and the scheme would benefit from some improvements.
- 5.3 **Planning Policy:** The proposal meets the requirements of policy SA34 making efficient use of existing employment land and as an integral, ancillary element of the scheme, the Wellness Centre is unlikely to adversely affect the vitality and viability of the Burgess Hill Town centre.
- 5.4 **WSCC Fire and Rescue Service:** No objection subject to condition requiring details of fire hydrant.
- 5.5 **Street Naming and Numbering:** Info 29
- 5.6 **Southern Water:** No objection subject to satisfactory drainage.
- 5.7 **WSCC Highways:** No objection subject to conditions.

6.0 Town/Parish Council Observations

6.1 Hurstpierpoint and Sayers Common Parish Council:

Our recommendation is that MSDC should give permission, subject to a sufficient and robust screening scheme being in place. Deliveries are informed of the appropriate access route via A2300 not via Cuckfield Road south of Gatehouse Lane.

7.0 Introduction

- 7.1 This application seeks full planning permission for a proposed mixed used commercial park including a wellness centre Class E(d) and 19 units for Class E(g), B2 or B8 uses.

8.0 Relevant Planning History

- 8.1 **HP/003/96** - Continued use of all existing premises for commercial purposes on a permanent basis – Approved 23rd February 1996.
- 8.2 **00/01950/FUL** - Variation of condition 11 of consent HP/3/96 for Saturday hours of working to extend from 13.00 to 17.00 – Approved 17th October 2000.
- 8.3 **13/02726/CND** - Variation of Condition 11 of Planning Permission HP/3/96 to allow works to commence at 07.30am – Refused 25th September 2013.

9.0 Site and Surroundings

- 9.1 The site is located on the south side of Gatehouse Lane with a long access drive leading to the site of some 1.6 hectares and is currently occupied by around 11 industrial buildings, with a variety of uses including car repairs and servicing, storage and light manufacturing. Toward the southern end of the site are areas of open storage and a salvage yard.
- 9.2 It is clear the site has developed over time in piecemeal way and the site appears untidy and has not been well maintained with the units having a dilapidated appearance and the road surfaces are uneven.
- 9.3 To the east of the access from Gatehouse Lane there are two residential properties, Little Shepherd and Twin Oaks. The garden of Little Shepherd runs the length of the access drive and the rear boundary adjoins the northern part of the application site. To the west there is open land and beyond this a residential property Gothards, that fronts onto Gatehouse Lane and some 160 metres further to the west beyond the intervening field is Windmill Nursery. To the south of the site there is woodland.
- 9.4 The site is located in the countryside and is allocated as an existing employment site in the Site Allocations Development Plan Document (Sites DPD).

10.0 Application Details

- 10.1 This application seeks full planning permission for a proposed mixed used commercial park including a wellness centre Class E(d) and 19 units for Class E(g), B2 or B8 uses.
- 10.2 The application proposes the complete redevelopment of the site with the demolition of all the existing buildings and their replacement with a new contemporary mixed used commercial park with a total floorspace of 4,615 sqm. The existing floorspace is 3,620 sqm therefore there would be a 995 sqm net increase in floorspace. As part of the proposals a new wellness centre is included in the scheme.
- 10.3 The existing entrance to the site and the access drive are to be widened to allow two vehicles to pass.
- 10.4 The plans show 19 industrial units in total with the size of the units ranging from 90sqm to 600sqm and a 600sqm wellness centre.
- 10.5 The wellness centre would be sited in the north of the development close to the northern boundary of the site and to the east of the access road. The industrial units would be arranged with 5 units forming a terrace to the south of the wellness centre (units 1 to 5) with a terrace of 3 units (units 6 to 8) facing these units with a car parking court between them. To the south of these units there would be group of 4 units forming a courtyard (units 9 to 12). A further 6 units (units 13 to 18) would form a terrace sited along the eastern boundary of the site. Finally, the largest of the units (unit 19) would be located in the southern most section of the site close to the southern boundary.
- 10.6 The design of the units would reflect the proposed industrial use and the units including the wellness centre would have a contemporary design. The commercial units would all have a roller shutter door on the front elevation and a pedestrian entrance, with unit 19 the largest of the units having two roller shutter doors and a side glazed entrance. The proposed materials are a mix of aluminium cladding and

timber cladding with powder coated aluminium window frames. The roof forms would be a mix of pitched and parapeted flat roofs, all with solar panels and units 9 to 18 which have the flat roof would also have green roofs.

- 10.7 The heights of the units would vary with units 1 to 8 being some 6.2m in height, whilst units 9 to 18 would be some 7.4m in height and unit 19 some 6.8m in height.
- 10.8 The wellness centre would measure some 7.5m in height, some 35m in length and 12m in width. The centre would have a pitched roof with solar panels and use the same palette of materials as the industrial units but would also have large areas of glazing. At the rear an open covered area is shown to be used for outdoor yoga and Pilates classes.
- 10.9 There are 136 car parking spaces proposed along with 40 cycle parking spaces. The proposals also incorporate 22 active EVC spaces within the car park with a further 20% to be provided as passive spaces to accommodate future demand.
- 10.10 The landscaping plans show a tree lined access road with planted verges and a new pedestrian footpath and also includes new tree and hedgerow planting. The existing site boundaries to the east, west and south will be reinforced and enhanced with native species. The northern site boundary will be softened and enhanced by the planting native trees and shrubs.

11.0 Legal Framework and List of Policies

- 11.1 Planning legislation holds that the determination of a planning application shall be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 11.2 Specifically Section 70 (2) of the Town and Country Planning Act 1990 states:
'In dealing with such an application the authority shall have regard to:
a) The provisions of the development plan, so far as material to application,
b) And local finance considerations, so far as material to the application, and
c) Any other material considerations.'
- 11.3 Section 38(6) Planning and Compulsory Purchase Act 2004 provides:
'If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.'
- 11.4 The requirement to determine applications "in accordance with the plan" does not mean applications must comply with each and every policy, but is to be approached on the basis of the plan taken as a whole. This reflects the fact, acknowledged by the Courts, that development plans can have broad statements of policy, many of which may be mutually irreconcilable so that in a particular case one must give way to another.
- 11.5 Under section 38(5) of the Planning and Compulsory Purchase Act 2004 if a policy contained in a development plan for an area conflicts with another policy in the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published.
- 11.6 Using this as the starting point the development plan for this part of Mid Sussex consists of the District Plan, the Mid Sussex Site Allocations Development Plan Document and the Hurstpierpoint and Sayers Common Neighbourhood Plan.

11.7 National policy (which is contained in the National Planning Policy Framework and National Planning Policy Guidance) does not form part of the development plan but is an important material consideration.

11.8 **Mid Sussex District Plan**

The District Plan was adopted at Full Council on the 28th March 2018

Relevant policies include;

DP1 Sustainable economic development
DP12 protection and enhancement of countryside
DP17 Ashdown Forest SPA and SAC
DP21 transport
DP26 character and design
DP29 Noise, Air and Light Pollution
DP39 Sustainable Design and Construction
DP37 trees, woodland and hedgerows
DP41 flood risk and drainage

Site Allocations DPD

11.9 The SADPD was adopted on 29th June 2022. It allocates sufficient housing and employment land to meet identified needs to 2031. Relevant policies specific to this application include:

SA34: Existing Employment Sites

SA38: Air Quality

The Hurstpierpoint and Sayers Common Neighbourhood Plan

11.10 The Hurstpierpoint and Sayers Common_Neighbourhood Plan was adopted in March 2015. Relevant policies include:

POLICY Countryside HurstC1 Conserving and enhancing character.

Mid Sussex District Plan 2021-2039 Consultation Draft

11.11 The District Council is now in the process of reviewing and updating the District Plan. The new District Plan 2021 - 2039 will replace the current adopted District Plan. The draft District Plan 2021-2039 was published for public consultation on 7th November and the Regulation 18 Consultation period ran to 19th December 2022. No weight can currently be given to the plan due to the very early stage that it is at in the review process.

Mid Sussex Design Guide Supplementary Planning Document (SPD)

11.12 The Council has adopted a 'Mid Sussex Design Guide' SPD that aims to help deliver high quality development across the district that responds appropriately to its context and is inclusive and sustainable. The Design Guide was adopted by Council on 4th November 2020 as an SPD for use in the consideration and determination of

planning applications. The SPD is a material consideration in the determination of planning applications.

11.13 **MSDC Developer Infrastructure & Contributions SPD (2018)**

National Planning Policy Framework (NPPF) (July 2021)

11.14 The NPPF is a material consideration with specific reference to decision-taking paragraph 47 states that planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise.

11.15 **National Planning Policy Guidance**

National Design Guide

Ministerial Statement and Design Guide

On 1 October 2019 the Secretary of State for the Ministry of Housing, Communities and Local Government made a statement relating to design. The thrust of the statement was that the Government was seeking to improve the quality of design and drive up the quality of new homes. The Government also published a National Design Guide, which is a material planning consideration.

11.16 The National Design Guide provides guidance on what the Government considers to be good design and provides examples of good practice. It notes that social, economic and environmental change will influence the planning, design and construction of new homes and places.

Assessment

Principle of development

12.1 As the site lies within the countryside Policy DP12 of the District Plan is relevant which states:

The countryside will be protected in recognition of its intrinsic character and beauty. Development will be permitted in the countryside, defined as the area outside of built-up area boundaries on the Policies Map, provided it maintains or where possible enhances the quality of the rural and landscape character of the District,

and:

- it is necessary for the purposes of agriculture; or*
- it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan.*

12.2 A similar ethos is found in policy Countryside HurstC1 of the neighbourhood plan.

12.3 District Plan Policy DP1: Sustainable Economic Development supports Effective use of employment land and in part states:
Permitting appropriate intensification, conversion, redevelopment and/ or extension for employment uses providing it is in accordance with other policies in the Plan;

12.4 Policy DP1 also sets out a commitment to allocate further employment sites within the Site Allocations DPD. In this case the proposal is also supported by the adopted

Site Allocations DPD a Development Plan Document. The site is identified as an existing employment site in the DPD for Use Classes: E(g) (Business/Light Industrial), B2 (General Industrial) and B8 (Storage and Distribution) under policy SA34: Existing Employment Sites – Protection, Intensification and Redevelopment.

- 12.1 Policy SA34 in respect of existing employment sites outside of the built-up area boundary states in part:

Outside the built-up area, expansion of Existing Employment Sites for E(g)/B2/B8 uses will only be supported where:

- *Detailed layout and design are in keeping with its countryside location*
- *The expansion is contiguous with the boundary of an existing employment site*
- *Where the impacts of expansion are assessed in-combination with the existing site, and the overall impact of existing plus expansion is considered acceptable.*

- 12.2 The NPPF is also relevant and at para 84, states that:

- 12.3 *‘Planning policies and decisions should enable:*

a) the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings.’

- 12.4 In this case the proposed redevelopment is supported by policy SA34. All existing buildings and structures would be cleared and the 19 industrial units would be used for classes, E(g) (Business/Light Industrial), B2 (General Industrial) and B8 (Storage and Distribution) and would therefore comply with the requirements of policy SA34. However, the wellness centre located in the currently north west corner of the site would fall under use class E(d),(indoor sport, recreation or fitness) and therefore the proposed use falls outside of the uses that are supported by SA34.

- 12.5 In addition, in respect of the Wellness Centre, the potential impact on the nearby centre of Burgess Hill needs to be taken into consideration. The Wellness Centre use is within the NPPF definition of a ‘main town centre use’, for which a sequential test should be taken to accord with the Framework.

- 12.6 However, the applicant has provided further information regarding the specific nature of the proposed Wellness Centre. They state the intention is that the facility will operate as a business hub rather than a standalone leisure facility and will be an integral and subordinate part of the overall development, for use by the future occupiers of the employment units, as well as the general public, providing a flexible space for various practitioners to hire for use and thus should not be considered as a stand-alone element for which a sequential test would apply. The nature of the proposed operation as a flexible space with café is also described as having the potential to help reduce the need to travel off-site for occupiers of the main employment uses, thus also potentially reducing daily trips to and from the site.

- 12.7 In view of the above it is considered that proposed Wellness Centre would predominantly operate as an integral, ancillary element of the development as a business hub, for which a sequential test would not therefore apply. It is also noted that the design of the wellness centre would lend itself to conversion to an industrial use should the leisure use cease in the future.

- 12.8 It is considered that the proposal for 19 industrial units would meet the requirements of policy SA34 making efficient use of existing employment land. As an integral, ancillary element of the scheme, it is considered that the Wellness Centre is acceptable and is unlikely to adversely affect the vitality and viability of the Burgess Hill Town centre. The principle of the development is therefore acceptable.

Design and Impact on the Character of the Area

- 12.9 Policy DP26 in the District Plan seeks to ensure a high standard of design in all new development and requires new development to demonstrate a sensitive approach to urban design by respecting the character of the locality in which they take place.

- 12.10 It states:

'All development and surrounding spaces, including alterations and extensions to existing buildings and replacement dwellings, will be well designed and reflect the distinctive character of the towns and villages while being sensitive to the countryside. All applicants will be required to demonstrate that development:

- *is of high quality design and layout and includes appropriate landscaping and greenspace;*
- *contributes positively to, and clearly defines, public and private realms and should normally be designed with active building frontages facing streets and public open spaces to animate and provide natural surveillance;*
- *creates a sense of place while addressing the character and scale of the surrounding buildings and landscape;*
- *protects open spaces, trees and gardens that contribute to the character of the area;*
- *protects valued townscapes and the separate identity and character of towns and villages;*
- *does not cause significant harm to the amenities of existing nearby residents and future occupants of new dwellings, including taking account of the impact on privacy, outlook, daylight and sunlight, and noise, air and light pollution (see Policy DP29);*
- *creates a pedestrian-friendly layout that is safe, well connected, legible and accessible;*
- *incorporates well integrated parking that does not dominate the street environment, particularly where high density housing is proposed;*
- *positively addresses sustainability considerations in the layout and the building design;*
- *take the opportunity to encourage community interaction by creating layouts with a strong neighbourhood focus/centre; larger (300+ unit) schemes will also normally be expected to incorporate a mixed use element;*
- *optimises the potential of the site to accommodate development.'*

- 12.11 While DP12 seeks to protect and enhance the countryside.

- 12.12 The MSDC Design Guide has been adopted and is a material consideration in the determination of the application. This document seeks to inform and guide the quality of design for all development across Mid Sussex District. It sets out a number of design principles to deliver high quality, new development that respond appropriately to its context and is inclusive and sustainable. Within the Design Guide there is support for site optimisation.

- 12.13 The Urban Designer has commented on the application and is generally supportive of the scheme but has commented that the scheme would benefit from pedestrian and cycle connections to the DSCP1 East Parcels to DSCP1 West Parcels and that the elevations facing out towards the future residential development '*would benefit from more fenestration and better articulation/subdivision of the façade*'. These comments refer to the review of the District Plan and emerging Policy DSPC1: Land to the west of Burgess Hill, which potentially allocates housing sites to the west and east of the application site. However, as no weight can currently be given to the plan due to the very early stage that it is at, these aspirations are considered to be premature.
- 12.14 While the comments of the Urban Designer are noted regarding the elevations, the proposed industrial design of the units is considered acceptable and reflects the proposed use and purpose of the buildings. It is also relevant that the proposal is for a complete and cohesive redevelopment of a site that has been developed in an ad hoc way and the existing units are all dated and need of refurbishment. The development proposes modern sustainable units in a landscaped led setting.
- 12.15 In addition, it is considered that the wellness centre is sufficiently differentiated from the industrial buildings by its location and soft landscape that will screen it from the main site. While the centre does use the same palette of materials as the industrial units but would also have large areas of glazing particularly to the rear with an open covered area to the rear to be used for yoga and Pilates classes. As noted earlier in the report the design of the wellness centre could lend itself to conversion to an industrial use should the leisure use cease in the future.
- 12.16 Although the site is located in the countryside in term of the visual impact, it is relevant that there is existing development on the site with a variety of industrial units on the site with significant existing areas of hard surfacing and parking. The site currently appears untidy and has not been well maintained with the units having a dilapidated appearance and the road surfaces are uneven.
- 12.17 The new contemporary designed units, along with the proposed soft and hard landscaping will significantly improve the character and appearance of the site for the and wider landscape. The proposal does also include mitigation in the form of landscaping with a tree lined access road into the site, the details of which can be secured by condition. Therefore, it is considered that there would not be a significant impact and that any impact needs to be weighed against the associated employment opportunities that the redevelopment of the site would afford in terms of the economic benefits for the District.
- 12.18 In light of the above, the proposed development is considered to be acceptable in terms of design and would not have a significant impact on the wider countryside, being set within an existing Industrial site, thereby according with policies DP12 and DP26 of the District Plan.

Drainage

- 12.19 Policy DP41 of the District Plan requires development proposals to follow a sequential risk-based approach, ensure development is safe across its lifetime and not increase the risk of flooding elsewhere. In areas that have experienced flooding in the past, use of Sustainable Drainage Systems should be implemented unless demonstrated to be inappropriate.

12.20 The Drainage Engineer has considered the information submitted in regard to flood risk, surface water and foul water drainage and has raised no objection. It is considered that these matter can be suitably dealt with by condition, so there should be no conflict with these policies.

12.21 It is therefore considered that the proposal complies with Policy DP41 of the Mid Sussex District Plan.

Access And Transport

12.30 Policy DP21 the Mid Sussex District Plan states:

Development will be required to support the objectives of the West Sussex Transport Plan 2011-2026, which are:

- *A high quality transport network that promotes a competitive and prosperous economy;*
- *A resilient transport network that complements the built and natural environment whilst*
- *reducing carbon emissions over time;*
- *Access to services, employment and housing; and*
- *A transport network that feels, and is, safer and healthier to use.*

To meet these objectives, decisions on development proposals will take account of whether:

- *The scheme is sustainably located to minimise the need for travel noting there might be circumstances where development needs to be located in the countryside, such as rural economic uses (see policy DP14: Sustainable Rural Development and the Rural Economy);*
- *Appropriate opportunities to facilitate and promote the increased use of alternative means of transport to the private car, such as the provision of, and access to, safe and convenient routes for walking, cycling and public transport, including suitable facilities for secure and safe cycle parking, have been fully explored and taken up;*
- *The scheme is designed to adoptable standards, or other standards as agreed by the Local Planning Authority, including road widths and size of garages;*
- *The scheme provides adequate car parking for the proposed development taking into account the accessibility of the development, the type, mix and use of the development and the availability and opportunities for public transport; and with the relevant Neighbourhood Plan where applicable;*
- *Development which generates significant amounts of movement is supported by a Transport Assessment/ Statement and a Travel Plan that is effective and demonstrably deliverable including setting out how schemes will be funded;*
- *The scheme provides appropriate mitigation to support new development on the local and strategic road network, including the transport network outside of the district, secured where necessary through appropriate legal agreements;*
- *The scheme avoids severe additional traffic congestion, individually or cumulatively, taking account of any proposed mitigation;*
- *The scheme protects the safety of road users and pedestrians; and*
- *The scheme does not harm the special qualities of the South Downs National Park or the High Weald Area of Outstanding Natural Beauty through its transport impacts.*

Where practical and viable, developments should be located and designed to incorporate facilities for charging plug-in and other ultra-low emission vehicles. Neighbourhood Plans can set local standards for car parking provision provided that it is based upon evidence that provides clear and compelling justification for doing so.

- 12.22 As the existing vehicle access is not wide enough to allow two-way vehicle movement, the proposal include widening of the existing access to provide a 6.5m wide carriageway, with a 2m wide footway link. A new wider junction would replace the existing access into the site. The plans show visibility splays of 2.4 by 43 metres are to be provided along Gatehouse Lane.
- 12.23 There would be 136 car parking spaces provided along with 40 cycle parking spaces. The proposals also incorporate 22 active EVC spaces within the car park with a further 20% to be provided as passive spaces to accommodate future demand.
- 12.24 The Local Highway Authority (LHA) has reviewed the access and transport information submitted with the application and have raised no objections.
- 12.25 The LHA are satisfied with the visibility splays on the basis that the proposals are in essence using the existing access (albeit upgraded) and are in accordance with the recorded road speeds. The works for the access would be subject to a Section 278 Agreement with the LHA's.
- 12.26 The Transport Statement estimates that the proposed development would generate around 27 new trips in the AM peak and 24 new trips in the PM peak period. This is accepted by the LHA who have commented that:

As such, there is no expectation for this proposal to give rise to any 'Severe' increase in vehicular movements. Consideration is also given to the improvements to the access point which provide a more workable situation over the existing and provides suitable mitigation against the small increase in vehicular movements.

- 12.27 The LHA have also confirmed that the site's internal carriageway geometries can accommodate access and turning manoeuvres by large refuse vehicles.
- 12.28 It is noted that the Parish Council have commented that deliveries should be informed of the appropriate access route via A2300 not via Cuckfield Road south of Gatehouse Lane. This would be difficult to monitor and given that the LHA consider that there is no expectation for the proposal to give rise to any 'Severe' increase in vehicular movements it is not considered to be necessary in this case to control the route of delivery vehicles.
- 12.29 In view of the above it is therefore considered that the proposal would comply with the policy DP21.

Residential Amenity

- 12.30 In regard to residential amenity Policy DP26 states:

"does not cause significant harm to the amenities of existing nearby residents and future occupants of new dwellings, including taking account of the impact on privacy, outlook, daylight and sunlight, and noise, air and light pollution (see Policy DP29)"

- 12.31 The nearest residential properties are to the east of the access from Gatehouse Lane where there are two residential properties, Little Shepherd and Twin Oaks. The garden of Little shepherd runs the length of the access drive and the rear boundary adjoins the northern part of the application site.
- 12.32 Environmental Health officer has commented that the '*proximity of the site, with 19 commercial units and a wellness centre, to residential premises has potential to affect residential amenity by way of noise disturbance. However, the acoustic assessment demonstrates that whilst the noise emitted does depend somewhat on the final use, it can be sufficiently mitigated by imposing conditions for the hours of use and deliveries, and the level of music noise from the wellness centre and general noise from the other units.*'
- 12.33 Conditions relating to the hours of use and deliveries, and the level of music noise from the wellness centre and general noise from the other units therefore form part of the recommendation.
- 12.34 In view of the above it is considered that the proposals would comply with Policies DP26 and DP29 the Mid Sussex District subject to the conditions. set out in appendix A.

Ashdown Forest

- 12.35 Under the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations'), the competent authority - in this case, Mid Sussex District Council - has a duty to ensure that any plans or projects that they regulate (including plan making and determining planning applications) will have no adverse effect on the integrity of a European site of nature conservation importance. The European site of focus is the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC).
- 12.36 The potential effects of development on Ashdown Forest were assessed during the Habitats Regulations Assessment process for the Mid Sussex District Plan. This process identified likely significant effects on the Ashdown Forest SPA from recreational disturbance and on the Ashdown Forest SAC from atmospheric pollution.
- 12.37 A Habitats Regulations Assessment screening report has been undertaken for the proposed development.

Recreational disturbance

- 12.38 Increased recreational activity arising from new residential development and related population growth is likely to disturb the protected near-ground and ground nesting birds on Ashdown Forest.
- 12.39 In accordance with advice from Natural England, the HRA for the Mid Sussex District Plan, and as detailed in District Plan Policy DP17, mitigation measures are necessary to counteract the effects of a potential increase in recreational pressure and are required for developments resulting in a net increase in dwellings within a 7km zone of influence around the Ashdown Forest SPA. A Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) mitigation approach has been developed. This mitigation approach has been agreed with Natural England.

- 12.40 This planning application does not result in a net increase in dwellings within the 7km zone of influence and so mitigation is not required.

Atmospheric pollution

- 12.41 Increased traffic emissions as a consequence of new development may result in additional atmospheric pollution on Ashdown Forest. The main pollutant effects of interest are acid deposition and eutrophication by nitrogen deposition. High levels of nitrogen may detrimentally affect the composition of an ecosystem and lead to loss of species.
- 12.42 The potential effects of the proposed development are incorporated into the overall results of the transport model prepared for the Site Allocations DPD, which indicates there would not be an overall impact on Ashdown Forest. This means that there is not considered to be a significant in combination effect on the Ashdown Forest SAC by this development proposal.

Conclusion of the Habitats Regulations Assessment screening report

- 12.43 The screening assessment concludes that there would be no likely significant effects, alone or in combination, on the Ashdown Forest SPA and SAC from the proposed development.
- 12.44 No mitigation is required in relation to the Ashdown Forest SPA or SAC.

Sustainability

- 12.45 District Plan policy DP39 relates to Sustainable Design and Construction and states:

"All development proposals must seek to improve the sustainability of development and should where appropriate and feasible according to the type and size of development and location, incorporate the following measures:

Minimise energy use through the design and layout of the scheme including through the use of natural lighting and ventilation;

- *Explore opportunities for efficient energy supply through the use of communal heating networks where viable and feasible;*
- *Use renewable sources of energy;*
- *Maximise efficient use of resources, including minimising waste and maximizing recycling/ re-use of materials through both construction and occupation;*
- *Limit water use to 110 litres/person/day in accordance with Policy DP42: Water Infrastructure and the Water Environment;*
- *Demonstrate how the risks associated with future climate change have been planned for as part of the layout of the scheme and design of its buildings to ensure its longer term resilience.'*

- 12.46 Principle DG37 of the Council's Design Guide deals with 'sustainable buildings' and states;

'The Council welcomes innovative and inventive designs that respond to the sustainability agenda by minimising the use of resources and energy both through building construction and after completion.'

- 12.47 Paragraph 154 of the NPPF seeks to ensure new development helps, *"to reduce greenhouse gas emissions, such as through its location, orientation and design."* In determining planning applications paragraph 157 expects new development to, *'take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.'*
- 12.48 Primarily a fabric-first approach has been taken in this case to minimise energy consumption, including the following:
- High levels of thermal insulation
 - Excellent air tightness
 - Rainwater recycling
 - Electric car charging points
 - Low energy lighting
 - Low flow taps and fittings
 - Green roof
 - Solar panels
 - Air source heat pumps.
- 12.49 The submitted Sustainability assessment is considered acceptable in meeting the above policies and guidance in terms of sustainable design and construction. It should be noted that in respect of policy DP39 of the District Plan, the wording of this policy is supportive of improving the sustainability of developments, but there are no prescriptive standards for developments to achieve in respect of carbon emission reductions.
- 12.50 Similarly, the wording of principle DG37 of the Council's Design Guide seeks applicants to demonstrate and consider sustainable matters as part of their design approach, including the use of renewable technologies, but it does not require their use.

Other Matters

- 12.1 All the other issues raised during the consultation period have been taken into account and these other issues are either considered not to warrant a refusal of permission, are items that could be dealt with effectively by planning conditions or other legislation or are not even material planning considerations.
- 12.2 The air quality assessment and proposed mitigation is accepted by Environmental Health officer.
- 12.3 WSCC initially requested a TAD contribution as TAD contributions are required on commercial schemes where there is a net increase of 1,000 sqm or more. However, the plans have been amended by the applicant since the original submission to reduce the net gain in floorspace by 25sqm. The existing floorspace is 3,620 sqm and following the amendment the proposed floorspace is 4,615 sqm therefore there would be an overall 995 sqm net increase in floorspace, which is below the 1,000 sqm threshold. Thus, there is no longer a requirement for a S106 agreement in this case.

13.0 Planning Balance and Conclusion

- 13.1 This application seeks full planning permission for a proposed mixed used commercial park including a wellness centre Class E(d) and 19 units for Class E(g), B2 or B8 uses.
- 13.2 The proposal would redevelop an existing poor quality employment site and would bring forward high quality, fit for purpose commercial units, along with a Wellness Centre.
- 13.3 The development lies in the countryside, outside of the built-up area and therefore the development needs to be assessed against policy DP12 of the District Plan. It is clear that a fundamental principle of policy DP12 is that the countryside is protected for its intrinsic beauty. Development can be permitted where it maintains or enhances the quality of the rural landscape character of the District, and it is supported by a policy reference elsewhere in the DP, a development plan document or a neighbourhood plan.
- 13.4 In this case the proposal is supported by a Development Plan Document. The site is identified as an existing employment site in the Site Allocations DPD for Use Classes: E(g) (Business/Light Industrial), B2 (General Industrial) and B8 (Storage and Distribution) under policy SA34: Existing Employment Sites – Protection, Intensification and Redevelopment.
- 13.5 Policy SA34 supports the expansion of Existing Employment Sites for E(g)/B2/B8 uses. The 19 industrial units would be used for classes, E(g) (Business/Light Industrial), B2 (General Industrial) and B8 (Storage and Distribution) and would therefore comply with the requirements of policy SA34, also making efficient use of existing employment land. However, the wellness centre would fall under use class E(d),(indoor sport, recreation or fitness) and therefore the proposed use falls outside of the uses supported by SA34.
- 13.6 The Wellness Centre use is within the NPPF definition of a ‘main town centre use’, for which a sequential test would normally be required to accord with the Framework. In respect of the Wellness Centre, account needs also be taken of the potential impact on the nearby centre of Burgess Hill. However, following the submission of further information by the applicant, it is considered that proposed wellness centre would operate as an integral, ancillary element of the development as a business hub, and therefore a sequential test would not apply.
- 13.7 As an integral, ancillary element of the scheme, it is considered that the Wellness Centre is unlikely to adversely affect the vitality and viability of the Burgess Hill Town centre. It is also noted that the design of the wellness centre would lend itself to conversion to an industrial use should the leisure use cease in the future. Therefore, it is considered that this aspect of the proposal can be supported.
- 13.8 The principle of the development is therefore acceptable.
- 13.9 The proposed design, layout and scale of the development is considered acceptable, and it would not cause harm to the character and appearance of the area or countryside. It is not considered to cause significant harm to the neighbouring amenities.
- 13.10 There will be a neutral impact in respect of highway safety, drainage, contamination, and there will be no likely significant effect on the Ashdown Forest SPA and SAC.

- 13.11 The application is thereby considered to comply with policies DP1, DP12, DP17, DP20, DP21, DP26, DP29, DP39, and DP41 of the District Plan, policy SA34 and policy SA38 of the SADPD, policy Countryside HurstC1 of the Neighbourhood Plan, The Mid Sussex Design Guide SPD and the relevant provisions of the NPPF.

APPENDIX A – RECOMMENDED CONDITIONS

1. The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990.
2. The development hereby permitted shall be carried out in accordance with the plans listed below under the heading "Plans Referred to in Consideration of this Application".

Reason: For the avoidance of doubt and in the interest of proper planning.
3. The development hereby permitted shall not commence unless and until details of the proposed foul and surface water drainage and means of disposal have been submitted to and approved in writing by the local planning authority. No building shall be occupied until all the approved drainage works have been carried out in accordance with the approved details. The details shall include a timetable for its implementation and a management and maintenance plan for the lifetime of the development which shall include arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. Maintenance and management during the lifetime of the development should be in accordance with the approved details.

Reason: To ensure that the proposal is satisfactorily drained and to accord with the NPPF requirements, and Policy DP41 of the Mid Sussex District Plan (2014 - 2031).
4. Prior to the commencement of the development details showing the proposed location of the required fire hydrants shall be submitted to and approved in writing by the Local Planning Authority in consultation with West Sussex County Council's Fire and Rescue Service. The development shall only be implemented in accordance with the approved details and no dwelling hereby approved shall be occupied until such time as the approved fire hydrants have been installed and are operational.

Reason: In the interests of amenity and in accordance with policy DP20 Mid Sussex District Plan 2014 - 2031 and in accordance with The Fire & Rescue Service Act 2004.'
5. Works of construction or demolition, including the use of plant and machinery, necessary for implementation of this consent shall be limited to the following times:

Monday - Friday 08:00 - 18:00 Hours
Saturday 09:00 - 13:00 Hours
Sundays and Bank/Public Holidays no work permitted

Reason: To protect the amenity of local residents and to accord with Policy DP29 of Mid Sussex District Plan.

6. Hours of Use (operational): no commercial activity is permitted unless within the following hours -

0700 to 2300 hours, on any day.

Reason: To protect the amenity of local residents and to accord with Policy DP29 of Mid Sussex District Plan.

7. Noise Management Plan (all units except Wellness Centre): No unit shall be occupied until a Noise Management Plan for that use, including hours of operation, full details of loading/unloading arrangements, noisy activities and all appropriate noise mitigation measures, has been submitted to and approved in writing by the Local Planning Authority. The Noise Management Plan shall be implemented in full on occupation (initial or subsequent) of each unit and complied with thereafter unless otherwise agreed in writing by the Local Planning Authority.

Reason: To protect the amenity of neighbouring residents and to accord with Policy DP29 of Mid Sussex District Plan.'

8. Noise Management Plan (the Wellness Centre): This unit shall not be occupied until a Noise Management Plan for its use, including hours of operation, full details of external activities and all appropriate noise mitigation measures, has been submitted to and approved in writing by the Local Planning Authority. Noise from music or amplified sound shall not exceed the limits set in table 5.1 of the submitted Phlorum Noise Assessment (ref 12010B.S). The Management Plan shall be implemented in full on occupation and complied with thereafter unless otherwise agreed in writing by the Local Planning Authority.

Reason: To protect the amenity of neighbouring residents and to accord with Policy DP29 of Mid Sussex District Plan.

9. Deliveries and collections: No deliveries or collections of commercial goods or waste outside the following hours:

Mon to Fri 07:00 to 19:00 hours

Sat 08:00 to 13:00 hours

Sun and Public Holidays: none permitted

Reason: to protect the amenity of local residents and to accord with Policy DP29 of Mid Sussex District Plan.

10. Unless otherwise agreed in writing, noise associated with fixed plant and machinery incorporated within the development shall be controlled such that the Rating Level, measured or calculated at 1-metre from the façade of the nearest existing noise sensitive premises, shall not exceed 43dB LA90,(T). The Rating Level is to be determined as per the guidance provided in BS 4142:2014. Details of fixed plant or machinery and any mitigation measures required to achieve this standard shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be implemented before the commercial operation concerned begins

operating on site, and thereafter be maintained in accordance with the approved details. Details of post installation testing shall be submitted to the LPA upon request.

Reason: to protect the amenity of local residents and to accord with Policy DP29 of Mid Sussex District Plan.

11. Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site, including the identification and removal of asbestos containing materials, shall each be submitted to and approved, in writing, by the local planning authority:

- a) A site investigation scheme, based on the phase 1 geo-environmental desk study undertaken by EPS, dated 6th April 2023, ref: UK23.6392, to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site;

and, unless otherwise agreed in writing by the LPA,

- b) Based on the site investigation results and the detailed risk assessment (a) an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken

Reason: To ensure that the risks from land contamination to the future users of the land are minimised, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours, and other offsite receptors and to accord with Policy DP29 of Mid Sussex District Plan.

12. The development hereby permitted shall not be occupied/brought into use until there has been submitted to and approved in writing by the Local Planning Authority a verification plan by a competent person showing that the remediation scheme required and approved has been implemented fully and in accordance with the approved details (unless varied with the written agreement of the LPA in advance of implementation). Any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action shall be identified within the report, and thereafter maintained

Reason : To ensure that the risks from land contamination to the future users of the land are minimised, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours, and other offsite receptors and to accord with Policy DP29 of Mid Sussex District Plan.

13. If during construction, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing by the LPA), shall be carried out until a method statement identifying, assessing the risk and proposing remediation measures, together with a programme, shall be submitted to and approved in writing by the LPA. The remediation measures shall be carried out as approved and in accordance with the approved programme. If no unexpected contamination is encountered during development works, on completion of works and prior to occupation a letter confirming this should be submitted to the LPA. If unexpected contamination is encountered during development works, on completion of works and prior to occupation, the agreed

information, results of investigation and details of any remediation undertaken will be produced to the satisfaction of and approved in writing by the LPA.

Reason : To ensure that the risks from land contamination to the future users of the land are minimised, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours, and other offsite receptors and to accord with Policy DP29 of Mid Sussex District Plan.

14. No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters,
- the anticipated number, frequency and types of vehicles used during construction,
 - the method of access and routing of vehicles during construction,
 - the parking of vehicles by site operatives and visitors,
 - the loading and unloading of plant, materials and waste,
 - the storage of plant and materials used in construction of the development,

 - the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders), or details of public engagement both prior to and during construction works.

Reason: In the interests of highway safety and the amenities of the area and to accord with Policy DP21 of the Mid Sussex District Plan.

15. No development shall be carried out above ground slab level unless and until there has been submitted to and approved in writing by the Local Planning Authority full details of both hard and soft landscaping, which shall include indications of all existing trees and hedgerows on the land, and details of those to be retained, together with measures for their protection in the course of development.

Hard and soft landscape works shall be carried out in accordance with the approved details. The works shall be carried out prior to the occupation of any part of the development or in accordance with the programme agreed with the Local Planning Authority. Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species unless the Local Planning Authority gives written consent to any variation.

Reason: In the interests of visual amenity and of the environment of the development and to accord with Policy DP26 of the District Plan.

16. No development shall be carried out above ground slab level unless and until there has been submitted to and approved in writing by the Local Planning Authority samples and a schedule of materials and finishes to be used for the external walls, roofs and windows/doors of the proposed buildings. The works shall be carried out in accordance with the approved details unless otherwise agreed with the Local Planning Authority.

Reason: To enable the Local Planning Authority to control the development in detail in the interests of amenity by endeavouring to achieve a building of visual quality and to accord with Policy DP26 of the Mid Sussex District Plan.

17. No part of the development shall be first occupied until the vehicle parking has been constructed in accordance with the approved plan including 22 active EVC spaces. These spaces shall thereafter be retained for their designated use.

Reason: To provide adequate on-site car parking space for the development and to accord with Policy DP21 of the Mid Sussex District Plan.

18. No part of the development shall be first occupied until the cycle parking spaces have been provided in accordance with the plans and details approved by the Local Planning Authority.

Reason: To provide alternative travel options to the use of the car in accordance with current sustainable transport policies and to accord with Policy DP21 of the Mid Sussex District Plan.

19. No part of the development shall be first occupied until such time as the vehicular access serving the development has been constructed in accordance with the details shown on the drawing numbered T727_DD_01 REV A.

Reason: In the interests of road safety. and to accord with Policy DP21 of the Mid Sussex District Plan.

20. No part of the development shall be first occupied until a Travel Plan has been submitted to and approved in writing by the Local Planning Authority. The Travel Plan once approved shall thereafter be implemented as specified within the approved document. The Travel Plan shall be completed in accordance with the latest guidance and good practice documentation as published by the Department for Transport or as advised by the Highway Authority.

Reason: To encourage and promote sustainable transport and to accord with Policy DP21 of the Mid Sussex District Plan.

INFORMATIVES

1. The applicant is required to obtain all appropriate consents from West Sussex County Council, as Highway Authority, to cover the off-site highway works. The applicant is requested to contact The Implementation Team Leader (01243 642105) to commence this process. The applicant is advised that it is an offence to undertake any works within the highway prior to the agreement being in place.
2. The proposed development will require formal address allocation. You are advised to contact the Council's Street Naming and Numbering Officer before work starts on site. Details of fees and advice for developers can be found at www.midsussex.gov.uk/streetnaming or by phone on 01444 477175.

3. In accordance with Article 35 Town and Country Planning (Development Management Procedure) (England) Order 2015, the Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern within the application (as originally submitted) and negotiating, with the Applicant, acceptable amendments to the proposal to address those concerns. As a result, the Local Planning Authority has been able to grant planning permission for an acceptable proposal, in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework

Plans Referred to in Consideration of this Application

The following plans and documents were considered when making the above decision:

Plan Type	Reference	Version	Submitted Date
Location and Block Plan	2210-P-001		17.04.2023
Existing Site Plan	2210-P-002	A	17.04.2023
Existing Floor and Elevations Plan	2210-P-003		17.04.2023
Existing Floor and Elevations Plan	2210-P-004		17.04.2023
Existing Floor and Elevations Plan	2210-P-005		17.04.2023
Existing Floor and Elevations Plan	2210-P-006		17.04.2023
Existing Floor and Elevations Plan	2210-P-007		17.04.2023
Proposed Site Plan	2210-P-008	B	29.06.2023
Landscaping Details	2210-P-009	A	29.06.2023
Proposed Floor Plans	2210-P-010	A	29.06.2023
Proposed Floor Plans	2210-P-011	A	29.06.2023
Proposed Floor Plans	2210-P-012		17.04.2023
Proposed Floor Plans	2210-P-013		17.04.2023
Proposed Floor Plans	2210-P-014		17.04.2023
Proposed Elevations	2210-P-015		17.04.2023
Proposed Elevations	2210-P-016		17.04.2023
Proposed Elevations	2210-P-017		17.04.2023
Proposed Elevations	2210-P-018		17.04.2023
Proposed Elevations	2210-P-019	A	29.06.2023
Proposed Elevations	2210-P-020		17.04.2023
Proposed Elevations	2210-P-021		17.04.2023
Proposed Elevations	2210-P-022		17.04.2023
Street Scene	2210-P-023		17.04.2023

APPENDIX B – CONSULTATIONS

DRAINAGE ENGINEER

FLOOD RISK

The application is supported by a Flood Risk Assessment and Drainage Strategy report dated April 2023. The report has assessed the flood risk posed to the site, and the development, from all sources of flood risk. It concludes that flood risk across the development is low.

The submitted report is considered to meet with all national and local policies and guidance in relation to assessing flood risk and is therefore considered acceptable.

SEWERS ON SITE

The Southern Water public sewer map does not show any public sewers located within the redline boundary of the site.

There may be sewers located on the site not shown on the plan which are now considered public sewers. Any drain which serves more than one property, or crosses into the site from a separate site may be considered a public sewer. Advice in relation to this situation can be found on the relevant water authority's website.

SURFACE WATER DRAINAGE

INFORMATION

Surface water drainage will ultimately need to be designed to meet the latest national and local drainage policies. The drainage system will need to consider climate change, the allowances for which should be based on the [latest climate change guidance](#) from the Environment Agency.

Detailed drainage design calculations should utilise a CV = 1.0.

APPLICATION SPECIFIC COMMENT

The BGS infiltration potential map shows the site to be in an area with low infiltration potential. Therefore, the use of infiltration drainage such as permeable paving or soakaways is unlikely to be possible on site. To ensure the drainage hierarchy is followed this will need to be confirmed through infiltration testing on site as part of detailed drainage design.

The application is supported by a Flood Risk Assessment and Drainage Strategy dated April 2023. The report proposes to attenuate and discharge surface water into an existing ditch located along the southern boundary of the site. It is proposed to discharge surface water at a variable rate all of which provide a betterment over the existing brownfield situation.

The principle of attenuating and discharging surface water into the watercourse is considered acceptable. We would however, advise the applicant that discharge into the watercourse should be restricted to as close as practically possible to the Greenfield (as if site was currently undeveloped) QBar runoff rate for all events up to and including the 1:100 plus climate change event.

Information into our general requirements for detailed surface water drainage design is included within the 'General Drainage Requirement Guidance' section. This level of information will be required to address the recommended drainage condition.

To ensure the final drainage design meets with the latest design requirements we would advise the applicant to confirm the design parameters required in relation to climate change etc prior to undertaking detailed design.

FOUL WATER DRAINAGE

It is proposed that the development will utilise a private package treatment plant to manage foul water drainage.

The principle of utilising a package treatment plant to manage foul water drainage is considered acceptable in principle. We would advise the applicant that an appropriate means of managing foul water discharge, in line with the Environment Agency's General Binding Rules, should be considered as early as possible within the development design process.

Information into our general requirements for detailed foul water drainage design is included within the 'General Drainage Requirement Guidance' section.

To ensure the final drainage design meets with the latest design requirements we would advise the applicant to confirm the design parameters required prior to undertaking detailed design.

CONDITION RECOMMENDATION

C18F - MULTIPLE DWELLINGS/UNITS

The development hereby permitted shall not commence unless and until details of the proposed foul and surface water drainage and means of disposal have been submitted to and approved in writing by the local planning authority. No building shall be occupied until all the approved drainage works have been carried out in accordance with the approved details. The details shall include a timetable for its implementation and a management and maintenance plan for the lifetime of the development which shall include arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. Maintenance and management during the lifetime of the development should be in accordance with the approved details.

Reason: To ensure that the proposal is satisfactorily drained and to accord with the NPPF requirements, Policy CS13 of the Mid Sussex Local Plan, Policy DP41 of the Pre-Submission District Plan (2014 - 2031) and Policy ...'z'... of the Neighbourhood Plan.

WORKS WITHIN 5M OF DRAIN OR WATERCOURSE

No part of any concrete foundations or features, including boundary treatments, and no construction activities shall be within 5 metres of any drain or watercourse without written permission from the Local Planning Authority.

Reason: In the interests of protecting the natural environment and in line with West Sussex Lead Local Flood Authority Culvert Policy.

SURFACE WATER DRAINAGE VERIFICATION REPORT

No building is to be occupied, or brought into use, until a Verification Report pertaining to the surface water drainage system, carried out by a competent Engineer, has been submitted to the Local Planning Authority. The Verification Report shall demonstrate the suitable operation of the drainage system such that flood risk is appropriately managed, as approved by the Lead Local Flood Authority. The Report shall contain information and evidence (including photographs) of earthworks; details and locations of inlets, outlets, and control structures; extent of planting; details of materials utilised in construction including subsoil, topsoil, aggregate and membrane liners; full as built drawings; and topographical survey of 'as constructed' features. The Verification Report should also include an indication of the adopting or maintaining authority or organisation.

Reason: To ensure that the constructed surface water drainage system complies with the approved drainage design and is maintainable.

Southern Water

Thank you for your letter dated 19/04/2023.

The Environment Agency should be consulted directly by the applicant regarding the use of a private wastewater treatment works which disposes of effluent to sub-soil irrigation.

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS).

Under certain circumstances SuDS will be adopted by Southern Water should this be requested by the developer. Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDS component, adoption will be considered if such systems comply with the latest Design and Construction Guidance (Appendix C) and CIRIA guidance available here:

water.org.uk/sewerage-sector-guidance-approved-documents/

ciria.org/Memberships/The_SuDS_Manual_C753_Chapters.aspx

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The Council's technical staff and the relevant authority for land drainage consent should comment on the adequacy of the proposals to discharge surface water to the local watercourse.

It is possible that a sewer now deemed to be public could be crossing the development site. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its ownership before any further works commence on site.

For further advice, please contact Southern Water, Southern House, Yeoman Road, Worthing, West Sussex, BN13 3NX (Tel: 0330 303 0119).

Website: southernwater.co.uk or by email at: SouthernWaterPlanning@southernwater.co.uk

WSCC Highways

Background

WSCC in its role of Local Highway Authority (LHA) has been consulted on the proposals for highway safety, capacity and access. This application proposes a comprehensive redevelopment of the employment site known as Farmers Stores, Gatehouse Lane, Goddards Green. Farmer's Stores is an existing employment site, which accommodates a range of businesses that all carry out activities and processes, all of which are general industry and fall under land use class E and B2.

The LHA provided pre-application advice to the proposals in March 2023 and following this consultation the applicant has prepared the accompanying Transport Statement (TS) which has been provided in support of this application. The LHA undertook a site visit on the morning of the 9th May 2023 to assess the access in its current form and provide further assessment on how the access will be improved as part of these proposals.

Access and Visibility

As outlined within the TS the existing vehicle access is not wide enough to enable two-way vehicle movement simultaneously, this was observed during our site visit. The redevelopment proposals include a 6.5m wide carriageway, meeting LHA standards, this is supported by a 2m wide footway link. The new junction would replace the existing access therefore acting as a replacement junction. The TS includes a speed survey which includes average and 85th percentile road speeds along Gatehouse Lane. For ease of reference the recorded speeds were:

- 31.8 mph Eastbound
- 31 mph Westbound

As agreed at the pre-application stage splays of 2.4 by 43 metres are to be provided along Gatehouse Lane. The splays have been demonstrated on drawing T727_DD_01 REV A. The LHA would accept the splays on the basis that the proposals in essence are the existing access (albeit upgraded) and are in accordance with the recorded road speeds.

The works for the access would be subject to a Section 278 Agreement with the LHA's Highway Agreements Team.

Stage 1 Road Safety Audit

In accordance with the adopted LHA's 'Road Safety Audit Policy', a Stage 1 RSA has been undertaken in accordance with the GG119 governance document by an independent Audit. One matter has been raised in relation to visibility however the Auditor has now commented on this and the issues raised and has confirmed the issues have been addressed.

Capacity

Traffic flow information has been provided with the current application within the TS, this has been provided by the applicant on what vehicular activity currently exists at the site. This information considers the permitted and proposed uses and was agreed with the LHA at the pre-application stage. The traffic flow generation is based upon the use of TRICS. TRICS is a database containing surveys of other completed and occupied developments. The database can be refined to use comparably located site uses to forecast potential traffic generation. TRICS is an accepted means of determining traffic generation. Using this data, it is evident that the proposed development for 27 new trips (14+13) in the AM peak and 24 new trips in the PM peak period (11+13). As such, there is no expectation for this proposal to give rise to any 'Severe' increase in vehicular movements. Consideration is also given to the improvements to the access point which provide a more workable situation over the existing and provides suitable mitigation against the small increase in vehicular movements.

Layout and Parking

Car and cycle parking provision will be in line with current WSCC guidelines. The applicant has stated 114 parking spaces within their supporting TS. The LHA would be satisfied with this amount of parking and given the sites layout this is likely to be the maximum that could realistically be provided. Cycle parking would be provided in line with WSCC's residential cycle parking standards.

The site's internal carriageway geometries can accommodate access and turning manoeuvres by large refuse vehicles. Bin carry distances for residents and collectors are in line with the maximum thresholds set out in MfS guidance.

Accessibility

As discussed at the pre-application stage it is proposed to include a non-motorised user link along with a wider access route to enable cycles to use the road and pass vehicles simultaneously. As outlined above the redevelopment proposals include a 6.5m wide carriageway, meeting LHA parameters, this is supported by a 2m wide footway link. The new footway link connects the site to Gatehouse Lane and is placed on the western side, to provide a more accessible connection to the busier side of Gatehouse Lane at the earliest point.

Conclusion

Based on the information within the TS the LHA would not consider the application would result in an 'Severe' residual impact on the adjoining highway network in accordance with Paragraph 109 of the National Planning Policy Framework (NPPF). Any approval of planning permission would be subject to the following conditions:

Access (Access to be provided prior to first occupation)

No part of the development shall be first occupied until such time as the vehicular access serving the development has been constructed in accordance with the details shown on the drawing numbered T727_DD_01 REV A.

Reason: In the interests of road safety.

Construction Management Plan

No development shall take place, including any works of demolition, until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters,

- the anticipated number, frequency and types of vehicles used during construction,
- the method of access and routing of vehicles during construction,
- the parking of vehicles by site operatives and visitors,
- the loading and unloading of plant, materials and waste,
- the storage of plant and materials used in construction of the development,
- the erection and maintenance of security hoarding,
- the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
- the prevention of deliveries at the site during school drop-off and pick-up time (generally 0800-0900 and 1430-1530),
- Access arrangements from the public highway, including temporary accesses and alterations to existing accesses.
- details of public engagement both prior to and during construction works.

Reason: In the interests of highway safety and the amenities of the area.

Travel Plan (to be approved)

No part of the development shall be first occupied until a Travel Plan has been submitted

to and approved in writing by the Local Planning Authority. The Travel Plan once approved shall thereafter be implemented as specified within the approved document. The Travel Plan shall be completed in accordance with the latest guidance and good practice documentation as published by the Department for Transport or as advised by the Highway Authority.

Reason: To encourage and promote sustainable transport.

INFORMATIVE

The applicant is required to obtain all appropriate consents from West Sussex County Council, as Highway Authority, to cover the off-site highway works. The applicant is requested to contact The Implementation Team Leader (01243 642105) to commence this process. The applicant is advised that it is an offence to undertake any works within the highway prior to the agreement being in place.

Planning Policy

Thank you for consulting the planning policy team on the planning application for: Proposed mixed used commercial park including a wellness centre Class E(d) and 19 units for Class E(g), B2 or B8 uses.

The policy team would like to make the following comments which focus predominantly on the acceptability of the principle of the proposal.

Planning applications should be determined in accordance with the Development Plan unless other material considerations dictate otherwise. The Development Plan comprises the Mid Sussex District Plan 2031, which is currently under review, and the Site Allocations DPD (Adopted June 2022).

National Planning Policy Framework

Paragraphs 7 and 8 of the Framework highlight the purpose of the planning system to contribute towards achieving sustainable development. Paragraph 11 goes on to state that decisions should apply a presumption in favour of sustainable development and approving development proposals that accord with an up-to-date development plan without delay.

Mid Sussex District Plan

The District Plan was adopted in March 2018 and is currently under review, the process of which commenced in 2021. The review process is a method to ensure that a Plan and the policies within it remain effective. The emerging District Plan (Regulation 18 October 2022) was recently consulted upon but is at a relatively early stage in the plan making process and as such the draft policies within the plan only have limited weight currently but gives an indication of the direction of travel.

Site Allocations Development Plan Document

The Site Allocations Development Plan Document (Sites DPD), is the 'daughter' document to the District Plan; it identifies additional housing allocations to meet the residual housing requirement, employment allocations to meet additional identified need, and other strategic policies. The Sites DPD was adopted on 29 June 2022 and the subject of this application is allocated as an Existing Employment Site for Use Classes: E(g) (Business/Light Industrial), B2 (General Industrial) and B8 (Storage and Distribution) under policy *SA34: Existing Employment Sites – Protection, Intensification and Redevelopment*.

The application is seeking to redevelop and expand the existing employment site to create a mixed use commercial development totalling 4,640sqm of new floorspace, 600sqm of which will be in E(d) use class to be used a wellness centre and the remaining 4,040sqm is proposed to be used flexible under E(g), B2 and B8 uses.

The industrial employment generating uses are proposed wholly within the area allocated in the Sites DPD whilst the wellness centre is located in the currently undeveloped north west corner of the site and includes a small area outside the extent of the allocated site but within an area of land in the applicant's ownership.

The site is made up of a series of single storey buildings of various ages, with areas of hardstanding and open storage and has permission for uses including car repairs/servicing, light engineering and storage. The buildings are of varying styles and are in various states of repair. The existing access is via a long narrow driveway.

Site Allocations DPD Policy SA34: *Existing Employment Sites – Protection, Intensification and Redevelopment*, seeks to strike an appropriate balance between ensuring protection of valued employment generating sites, whilst enabling sites which are no longer economically viable for continued employment use, to be considered for appropriate alternative uses. For the purposes of policy SA34, in respect of existing employment sites, they are classified as those in use classes E(g): Business, B2: General Industrial or B8: Storage or Distribution and are afforded protection under this policy.

Redevelopment

As set out in policy SA34, redevelopment for employment use within the boundary of Existing Employment Sites will be supported where it does not result in the overall loss of employment floorspace.

The policy goes on to state that proposals for alternative uses, with the exception of residential use, within Existing Employment Sites will only be supported where it can be demonstrated that the sequential approach has been applied to the redevelopment of the site, and the proposals support their integrity and function as centres of employment.

The majority of the site is proposed for redevelopment of employment uses in accordance with the requirements of SA34. The proposal would bring forward high quality fit for purpose employment generating commercial units resulting in an uplift of c.2,577sqm (excluding the wellness centre), compared to the existing provision.

The proposed wellness centre is not defined as a traditional employment use in the terms of SA34, although it is noted that the use would indeed have the potential to generate some additional employment. On assessing whether the proposal can demonstrate it has taken a sequential approach and the use supports the integrity and function as a centre of employment, the majority of the site is clearly proposed for employment generating uses with a small, currently undeveloped area of the site being proposed for the Wellness Centre. As described in more detail below, the additional information provided by the applicant on the nature of the intended operation of the facility as an integral part of the overall development, the proposal is considered to meet this requirement of the policy.

The proposal would therefore also represent a small expansion of the site as defined by policy SA34 and encompasses a sliver of land not within the defined boundary of the allocation. As such, further consideration should be given to the relevant elements of SA34 as follows:

Outside the built-up area, expansion of Existing Employment Sites for E(g)/B2/B8 uses will only be supported where:

- *Detailed layout and design are in keeping with its countryside location*
- *The expansion is contiguous with the boundary of an existing employment site*
- *Where the impacts of expansion are assessed in-combination with the existing site, and the overall impact of existing plus expansion is considered acceptable.*

In addition to consideration of SA34 in respect of the Wellness Centre, account should also be taken of the potential impact on the nearby centre of Burgess Hill. The Wellness Centre use is within the NPPF definition of a 'main town centre use', for which a sequential test should be taken to accord with the Framework.

The applicant has provided further information regarding the specific nature of the proposed Wellness Centre. They state the intention is that the facility will operate as a business hub rather than a standalone leisure facility and will be an integral and subordinate part of the overall development, for use by the future occupiers of the employment units, as well as a wider customer base, providing a flexible space for various practitioners to hire for use and thus should not be considered as a stand-alone element for which a sequential test would apply. The nature of the proposed operation as a flexible space with café is also described as having the potential to help reduce the need to travel off-site for occupiers of the main employment uses, thus also potentially reducing daily trips to and from the site.

Consideration should be given to the suggested widening of the uses allowed within the Wellness Centre to encompass use classes E(d), E(g) or B8 to allow for greater flexibility and potentially avoid the need to re-apply for planning permission in the event the leisure use ceases.

Conclusion

The proposal would redevelop an existing poor quality employment site, allocated by DPD policy SA34 and would bring forward high quality, fit for purpose employment generating commercial units, resulting in an uplift of c.2,577sqm (excluding the wellness centre) floorspace, compared to the existing mixed employment provision. Additional evidence provided by the agent following submission of the application has sought to clarify that the proposed Wellness Centre would predominantly operate as an integral, ancillary element of the development as a business hub, for which a sequential test would not therefore apply. The proposal meets the requirements of policy SA34 making efficient use of existing employment land and as an integral, ancillary element of the scheme, the Wellness Centre is unlikely to adversely affect the vitality and viability of the Burgess Hill Town centre.

Environmental Protection

The proximity of the site, with 19 commercial units and a wellness centre, to residential premises has potential to affect residential amenity by way of noise disturbance. However, the acoustic assessment demonstrates that whilst the noise emitted does depend somewhat on the final use, it can be sufficiently mitigated by imposing conditions for the hours of use and deliveries, and the level of music noise from the wellness centre and general noise from the other units.

The air quality assessment is accepted and has calculated an appropriate sum to be allocated AQ mitigation. This sum is agreed, and an appropriate scheme should be submitted.

I therefore recommend noise related conditions in order to protect the noise sensitive receptors should this development receive approval. Additionally, I recommend conditions to control construction hours, noise from any plant & machinery installed in the commercial unit and delivery hours:

Construction hours: Works of construction or demolition, including the use of plant and machinery, necessary for implementation of this consent shall be limited to the following times:

Monday – Friday 08:00 - 18:00 Hours

Saturday 09:00 - 13:00 Hours

Sundays and Bank/Public Holidays no work permitted.

Reason: to protect the amenity of local residents.

Hours of Use (operational): no commercial activity is permitted unless within the following hours -

0700 to 2300 hours, on any day.

Noise Management Plan (all units except Wellness Centre): No unit shall be occupied until a Noise Management Plan for that use, including hours of operation, full details of loading/unloading arrangements, noisy activities and all appropriate noise mitigation measures, has been submitted to and approved in writing by the Local Planning Authority. The Noise Management Plan shall be implemented in full on occupation (initial or subsequent) of each unit and complied with thereafter unless otherwise agreed in writing by the Local Planning Authority.

Reason: To protect the amenity of neighbouring residents and to accord with Policy DP29 of Mid Sussex District Plan.'

Noise Management Plan (the Wellness Centre): This unit shall not be occupied until a Noise Management Plan for its use, including hours of operation, full details of external activities and all appropriate noise mitigation measures, has been submitted to and approved in writing by the Local Planning Authority. Noise from music or amplified sound shall not exceed the limits set in table 5.1 of the submitted Phlorum Noise Assessment (ref 12010B.S). The Management Plan shall be implemented in full on occupation and complied with thereafter unless otherwise agreed in writing by the Local Planning Authority.

Reason: To protect the amenity of neighbouring residents and to accord with Policy DP29 of Mid Sussex District Plan.'

Plant & Machinery: Unless otherwise agreed in writing, noise associated with fixed plant and machinery incorporated within the development shall be controlled such that the Rating Level, measured or calculated at 1-metre from the façade of the nearest existing noise sensitive premises, shall not exceed 43dB LA90,(T). The Rating Level is to be determined as per the guidance provided in BS 4142:2014. Details of fixed plant or machinery and any mitigation measures required to achieve this standard shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be implemented before the commercial operation concerned begins operating on site, and thereafter be maintained in accordance with the approved details. Details of post installation testing shall be submitted to the LPA upon request.

Environmental Protection Contaminated Land.

As part of the application, a phase 1 geo-environmental desk study has been undertaken by EPS, dated 6th April 2023, ref: UK23.6392.

The report advises that due to the site's previous as an agricultural dept, and current light industrial and commercial uses, that potential source-pathways-receptor linkages are present and should be investigated further. As such, the report recommends that an intrusive investigation will need to be undertaken as part of the development of the site.

The intrusive investigation will be part of a phased approach, whereby if contamination is found above the assessment criteria, a remediation options appraisal, remediation plan, and verification report will be required. As such, a phased condition should be attached. If no contamination is found during the intrusive investigation, then the entire phased condition can be discharged at that stage.

Additionally, a discovery strategy should also be attached, so that in the event that contamination not already identified through the desktop study is found, that works stop until such time that a further assessment has been made, and further remediation methods put in place if needed.

1) Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site, including the identification and removal of asbestos containing materials, shall each be submitted to and approved, in writing, by the local planning authority:

a) A site investigation scheme, based on the phase 1 geo-environmental desk study undertaken by EPS, dated 6th April 2023, ref: UK23.6392, to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site;

and, unless otherwise agreed in writing by the LPA,

b) Based on the site investigation results and the detailed risk assessment (a) an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken

2) The development hereby permitted shall not be occupied/brought into use until there has been submitted to and approved in writing by the Local Planning Authority a verification plan by a competent person showing that the remediation scheme required and approved has been implemented fully and in accordance with the approved details (unless varied with the written agreement of the LPA in advance of implementation). Any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action shall be identified within the report, and thereafter maintained

Reason (common to all): To ensure that the risks from land contamination to the future users of the land are minimised, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours, and other offsite receptors

In addition, the following precautionary condition should be applied separately:

3) If during construction, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing by the LPA), shall be carried out until a method statement identifying, assessing the risk and proposing remediation measures, together with a programme, shall be submitted to and approved in writing by the LPA. The remediation measures shall be carried out as approved and in accordance with the approved programme. If no unexpected contamination is encountered during development works, on completion of works and prior to occupation a letter confirming this should be submitted to the LPA. If unexpected contamination is encountered during development works, on completion of works and prior to occupation, the agreed information, results of investigation and details of any remediation undertaken will be produced to the satisfaction of and approved in writing by the LPA.

Urban Designer

I support this scheme subject to changes.

In principle proposal is acceptable, however it's worth mentioning that there are number of things that are not addressed, and the scheme would benefit from some improvements:

- Layout: considering the 'DSCP1: Land to the West of Burgess Hill' layout would benefit from incorporating some level of anticipation for future development:

- Wider context: MOVEMENT and PEDESTRIAN LINKAGES:

It would be of great benefit if the pedestrian connection from DSCP1 East Parcels to DSCP1 West Parcels would be created, forming a new 'pedestrian and cyclist link' stretching from west boundary, along trees (on the southern elevation of Wellness Centre), pass north elevation of Unit 13 to the east boundary– this would allow for better pedestrian linkages in a wider context and better access to Wellness Centre and Cafe by non-car users from surrounding sites.

- Wider context: ELEVATIONS and MASSING:

Trees forming natural site boundaries will most likely be incorporated into the design of the surrounding parcels; Residential Street elevations will likely be formed facing those trees. Elevations facing OUT towards future development would benefit from more fenestration and better articulation/subdivision of the façade.

I would recommend conditions requiring the approval of the following details/information:

- Detailed landscape drawings: hard and soft landscaping details including boundary treatments and street furniture (seating and lighting) arrangements.
- Details and samples of the facing materials.
- 1:20 sections and front elevations of the typical features (shown in context) including windows, doors etc.
- Detailed drawing explaining sustainability strategy.