



PLANNING COMMITTEE REPORT

TO: Planning Committee

BY: Head of Development and Building Control

DATE: 25 January 2021

DEVELOPMENT: Change of Use from Agricultural Barn (Stables/Equestrian) to Sus Generis to form new game processing workshop

SITE: Woodmans Farm London Road Ashington West Sussex

WARD: West Chiltington, Thakeham and Ashington

APPLICATION: DC/21/1756

APPLICANT: **Name:** Mr Anthony Skeet **Address:** North Farm Game Workshop North Farm Washington RH20 4BB

REASON FOR INCLUSION ON THE AGENDA: More than eight persons in different households have made written representations within the consultation period raising material planning considerations that are inconsistent with the recommendation of the Head of Development and Building Control.

RECOMMENDATION: To approve planning permission subject to appropriate conditions

1. THE PURPOSE OF THIS REPORT

- 1.1 To consider the planning application.

DESCRIPTION OF THE APPLICATION

- 1.2 The application seeks full planning permission for the change of use of the 2no. buildings to provide for the processing, packaging and distribution of game meat (a sui generis use) and associated office accommodation.
- 1.3 Chanctonbury Game is an established business currently operating from a site on the Wiston Estate, but following an end to the tenancy, is looking to relocate to Woodmans Farm. The proposal would involve no external alterations to the subject building, albeit that existing windows and doors would likely be replaced, with internal alterations undertaken to provide the necessary areas for the operation, including processing areas for birds and venison, freezer and chiller spaces, and staff mess accommodation.
- 1.4 The access to the site would remain unchanged, with the hardstanding areas to the east and west of the building utilised for loading and distribution purposes.

DESCRIPTION OF THE SITE

- 1.5 The application building was previously used as a racing stable albeit that this would appear to be excess of the permitted use for private equestrian facilities approved under planning reference WX/4/89. The interior of the building is arranged to provide 22no. stables and managers office. Several of the stables remain in use for the purpose of keeping horses, albeit that the majority are currently unused.
- 1.6 The wider site comprises a number of agricultural buildings used as part of a former dairy farm, with these buildings no longer in use. A cluster of residential dwellings are located to the south-west of the subject building and these comprise converted agricultural barns, with the residential dwelling of Woodmans House located further to the west. These dwellings are located approximately 30m from the western elevation of the subject building, with each benefitting from an off-road parking area and small amenity space.
- 1.7 The wider area is characterised by open countryside and woodland, with the A24 located to the far-west of the site. The surrounding land comprises undulating topography, with the land immediately to the east of the subject building stepped down.

2. INTRODUCTION

STATUTORY BACKGROUND

- 2.1 The Town and Country Planning Act 1990.

RELEVANT PLANNING POLICIES

- 2.2 The following Policies are considered to be relevant to the assessment of this application:

2.3 National Planning Policy Framework

2.4 Horsham District Planning Framework (HDPF 2015)

Policy 1 - Strategic Policy: Sustainable Development
Policy 2 - Strategic Policy: Strategic Development
Policy 3 - Strategic Policy: Development Hierarchy
Policy 4 - Strategic Policy: Settlement Expansion
Policy 7 - Strategic Policy: Economic Growth
Policy 9 - Employment Development
Policy 10 - Rural Economic Development
Policy 24 - Strategic Policy: Environmental Protection
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
Policy 26 - Strategic Policy: Countryside Protection
Policy 29 - Equestrian Development
Policy 31 - Green Infrastructure and Biodiversity
Policy 32 - Strategic Policy: The Quality of New Development
Policy 33 - Development Principles
Policy 35 - Strategic Policy: Climate Change
Policy 36 - Strategic Policy: Appropriate Energy Use
Policy 37 - Sustainable Construction
Policy 38 - Strategic Policy: Flooding
Policy 40 - Sustainable Transport
Policy 41 - Parking

RELEVANT NEIGHBOURHOOD PLAN

- 2.5 N/A

PLANNING HISTORY AND RELEVANT APPLICATIONS

WX/3/86	C/u of 2 bays of existing covered yard from agricultural use to corn merchants mill and retail shop (From old Planning History)	Application	Refused	on
		03.06.1986		
WX/4/89	C/u of agricultural building to provide stabling for horses (From old Planning History)	Application	Permitted	on
		11.07.1986		
WX/3/90	Residential holiday complex catering for the physically handicapped - 5 holiday units and 1 farmhouse Site: Woodmans Barn Farm Dial Post	Application	Permitted	on
		06.09.1993		
WX/6/94	Retention of two mobile homes for domestic purposes Site: Woodmans Farm London Road Ashington	Application	Refused	on
		04.07.1994		
WX/5/95	Conversion of existing disused barns to form 2 holiday accommodation units, 3 dwellings and parking Site: Woodmans Barn Farm London Road Ashington	Application	Permitted	on
		08.08.1996		
WX/3/02	Change of use of building to 24 hour security unit Site: Unit 5 Woodmans Barn Farm London Road Ashington	Application	Permitted	on
		15.04.2002		
WX/9/02	Variation of condition 4 on wx/3/02 to allow sleep over facilities in security unit Site: Woodmans Barn Farm London Road Ashington	Application	Permitted	on
		30.07.2002		
WX/7/84	Conversion of redundant barn and outbuildings for residential use. one single dwellinghouse (From old Planning History)	Application	Permitted	on
		18.09.1985		
WX/15/02	Conversion of building into security/sleeping accommodation Site: Small Barn Woodmans Farm Barn London Road Ashington	Application	Permitted	on
		19.11.2002		
WX/2/03	Conversion of building into security/shepherds & holiday accommodation Site: Woodmans Farmhouse London Road Ashington	Application	Permitted	on
		15.05.2003		
WX/5/03	Conversion of existing barn to 1 holiday unit for all year round use Site: Unit 2 Woodmans Barn Farm London Road Ashington	Application	Permitted	on
		29.05.2003		
DC/05/0828	Installation of an underground raw sewage pumping unit to serve the cart shed	Application	Permitted	on
		25.05.2005		
DC/09/1406	Removal of all occupancy restrictions relating to Unit 1 (owner's farmhouse), Unit 3 (Woodmans Cottage), Unit 6 (The Granary) and removal of Condition 10 of WX/5/95 relating to Unit 7 (The Cartshed) relating to limiting holiday let periods, to enable the letting of all or any of the residential units to others so that the units can continue to be used in conjunction with the stables, gallops and grazing	Withdrawn Application		on
		12.10.2009		
DC/11/2486	Continued use of former farm buildings as 4 self contained dwellings and 1 to be occupied by owner/farm manager, provision of parking for 10 cars and use of further building as farm office.	Application	Permitted	on
		07.11.2012		
DC/13/1516	Non-material amendment to previously approved DC/11/2486 (Continued use of former farm buildings as 4 self contained dwellings and 1 to be occupied by owner/farm manager, provision of parking for 10 cars and use of further building as farm office) to include retention of 2 conservation roof lights on Unit 2 Granary Barn and installation of 3 conservation roof lights on south elevation of Unit 6 The Granary in replacement for 3 existing velux roof lights	Application	Permitted	on
		17.09.2013		

3. OUTCOME OF CONSULTATIONS

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

INTERNAL CONSULTATIONS

- 3.2 **HDC Environmental Health:** Given the location of the site and nature of the area, activities at this site are unlikely to have any adverse impact however there are some residential properties in close proximity that may be impacted.

This business will require approval from the Food Standards Agency in order for the business to operate. As part of the initial approval process the operators will be required to demonstrate full details of safe and legal storage & collection of animal by-products waste by a licensed collector. This department would however be responsible for the enforcement of any odour nuisance.

Conditions regarding construction hours, delivery hours, storage, external lighting, and details regarding external plant.

- 3.3 **HDC Economic Development:** The proposal aligns with several of the key priorities set out in our Economic Strategy. In particular, it supports Priority 2 which highlights the importance of supporting local businesses to start-up, grow and remain within the District. It is important that we facilitate business growth within our District, as it ensures that our existing businesses remain viable in the long-term and contributes towards long-term economic growth. This proposal would enable an established local business to relocate having been given notice on their existing premises. It would allow them to establish a new game processing workshop at the site, providing them with an opportunity for growth. The Department would be in favour of a proposal that supports this existing business in its long-term viability and enables them to continue operating within our District's boundaries.

Moreover, the proposal would also support a local producer, which supplies its meat to local businesses alongside larger wholesalers. The Department is keen to support businesses supplying other businesses and this aligns with the 'Buy Local' approach, which not only supports other local businesses but also contributes towards a more sustainable local economy by maintaining a local supply chain and reducing food miles. As one of the few businesses of its kind within the local area, we would encourage a proposal which enables this business to grow and remain within our District so it can continue to supply its meat to other local businesses.

As well as benefitting the business, the proposal would also continue to support and maintain the jobs that are currently provided by them within the local area. It is also suggested that the creation of this new workshop, could facilitate additional employment opportunities within the local area in the future.

Overall, Economic Development supports this proposal as it enables a local business to grow and remain within the District, supports a local producer supplying other local businesses and has the potential to provide further employment opportunities in the future.

OUTSIDE AGENCIES

- 3.4 **WSCC Highways:** The site is located on North Lane, an un-adopted road maintained as Public Bridleway no. 2500. WSCC in its role as Local Highway Authority (LHA) raises no highway safety concerns for this application.

The Applicant proposes no alterations to the existing access arrangements. The Applicant has provided details of anticipated trip generation and vehicle types within the Design & Access Statement. Vehicles travelling to or from the site mainly consist of rigid lorries and

vans, visiting a few times per week, depending on which game is being delivered. A couple of vans per day are also anticipated, as are approximately three cars for staff. Having considered these trip generation details, the LHA does not anticipate that the proposed change of use would give rise to a material intensification of movements to or from the site, compared with the potential of the existing agricultural use.

The Applicant has demonstrated a turn on-site via swept path tracking for both a fire appliance and rigid lorry. From inspection of the plans, there also appears to be sufficient space on-site for the parking and unloading of lorries/vans. An inspection of collision data provided to WSCC by Sussex Police from a period of the last five years reveals no recorded injury accidents attributed to road layout within the vicinity of the site. Therefore, there is no evidence to suggest the existing access is operating unsafely or that the proposal would exacerbate an existing safety concern.

The Local Highways Authority does not consider that this proposal would have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network, therefore is not contrary to the National Planning Policy Framework, and that there are no transport grounds to resist the proposal.

- 3.5 **WSCC Fire and Rescue:** Having viewed the plans for planning application DC/21/1756, the nearest fire hydrant to the Change of Use from Agricultural Barn (Stables/Equestrian) to Sus Generis to form new game processing workshop is 360 metres away, 270 metres more than the required 90 metres distance for a commercial property. Should an alternative supply of water for firefighting be considered it will need to conform with the details identified in Approved Document – B (ADB) Volume 1 2019 edition: B5 section 16.

- 3.6 **Natural England:** West Sussex is one of the most heavily wooded counties in England, with the highest proportion of ancient and semi-natural woodland. Many of these sites are designated as Sites of Species Scientific Interest (SSSIs).

A number of these SSSIs have recently been assessed and found to be in declining condition due to the impact of deer browsing. This includes SSSIs woodlands within Horsham District such as St. Leonard's Forest.

Deer are an important part of the UK's woodland ecology and can have a vital role to play in balanced woodland and wood-pasture ecosystems. However, recent decades have seen a sharp rise in the UK's deer population. Browsing by deer is now a major threat to the health and resilience of many woodlands, and to the favourable condition of woodland SSSIs.

Deer management carried out collaboratively at a landscape scale (due to the free-roaming nature of individual and herds of deer) is therefore essential for the future condition of these SSSIs and other woodland sites.

An essential part of that mechanism is the network of Approved Game Handling Establishments (AGHEs) which take the majority of carcasses resulting from culling operations. Since AGHEs are already scarce, there is concern that if these numbers decrease further, fewer deer will be culled and that may significantly affect current woodland management and the condition of woodland SSSIs.

Understand that the AGHE in the region is undergoing a planning review. This particular AGHE is of critical importance as an outlet for deer carcasses throughout the Wealden area and Western Downs.

- 3.7 **Natural England - Water Neutrality:** Objection if the development is not water neutral

It cannot be concluded that existing abstraction within the Sussex North Water Supply Zone is not having an adverse effect on the integrity of the Arun Valley SAC/SPA/Ramsar sites. Developments within Sussex North must therefore must not add to this impact and one way of achieving this is to demonstrate water neutrality. The definition of water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place.

To achieve this Natural England is working in partnership with all the relevant authorities to secure water neutrality collectively through a water neutrality strategy. Whilst the strategy is evolving, Natural England advises that decisions on planning applications should await its completion. However, if there are applications which a planning authority deems critical to proceed in the absence of the strategy, then Natural England advises that any application needs to demonstrate water neutrality.

- 3.8 **South Downs National Park Authority:** Deer are an important part of the UK's woodland ecology and can have a vital role to play in balanced woodland and wood-pasture ecosystems. However, recent decades have seen a sharp rise in the UK's deer population. Browsing by deer is now a major threat to the health and resilience of woodlands. Therefore, deer management to achieve sustainable and healthy deer populations is most effective when carried out collaboratively at a landscape scale (due to the free-roaming nature of individual and herds of deer).

Managing deer reduces their browsing and trampling impacts, which is important for biodiversity. By protecting natural regeneration, young trees, growing forests and biodiversity we will be addressing some of the challenges of the climate emergency.

One of the constraints to undertaking deer management is the ability to market the venison, which is processed into high quality and affordable food products. Unfortunately, the number of game dealers has decreased over the last few years and prices have dropped due to cheaper imports. Losing another local game dealer would have a direct negative impact on deer management across the SDNP. This business contributes to SDNP's high quality food sector by providing venison for the local and national markets and helping to sustain jobs in rural communities.

Chanctonbury Game is not only the major processor of game and deer in the region, but it also is a conduit for distribution. It is important to emphasise the significance of Chanctonbury Game to the local and wider community in West Sussex. The employment and supply chain that depends on its continued existence (farms, farm shops, shoots, pet food manufacturers) is something to be taken into consideration.

Deer Management needs an outlet to improve the condition of designated habitats (the condition of many designated sites across the SDNP is declining due to deer pressure/browsing) and to secure the establishment of new woodlands through natural regeneration. It is also worth mentioning that by breaking the food supply chain, deer control might drop, leading to an increase in the population with the subsequent increase in road traffic accidents, crop failures and environmental damage.

This type of business is important for the local economy, its contribution to the provision of jobs, the local food supply chain and the ability of stalkers to source a home for their produce and manage deer numbers in the SDNP. The advantages of local stalkers supplying local game dealers is that the supply chain is short and food miles are greatly reduced. The link to local provenance and traceability of products are increasingly recognised and valued due to the reduced carbon footprint and the importance of knowing the source of those products.

PUBLIC CONSULTATIONS

- 3.9 **Wiston Parish Council:** Strong Objection

- Access to and from site is dangerous
- Impact on public bridleway

- 3.10 18 letters of objections were received from 16 separate households, and these can be summarised as follows:

- Loss of amenity due to traffic
- Inappropriate location
- Increased frequency of traffic and heavy goods vehicles

- Noise pollution
- Safety risk
- Odour pollution to neighbouring properties
- Impact on users of the public bridleway
- Impact on ambience of the countryside
- Dangerous point of access
- Loss of privacy
- Number of visitors to the site
- Waste collections and accessibility to site
- Not essential to the rural location
- Inappropriate delivery hours
- Intensification of activity
- Construction works undertaken without approval
- Unacceptable impact on adjacent residential properties
- Antisocial hours of use

3.11 5 letters of support were received from 5 separate households, and these can be summarised as follows:

- Need to control deer populations
- Important service to the local community
- Easily accessible to highway network
- An essential service to farms in the locality
- Would support the rural economy
- Provides healthy and sustainable food source
- Small increase in vehicle movements
- Reduced vehicle movements compared to former equine use

3.12 1 letter of objection was received from a household outside of the District, and this can be summarised as follows:

- Impact on residential amenity
- Inappropriate site for the proposed use

3.13 10 letters of support were received from 10 separate households outside of the District, and these can be summarised as follows:

- Need for a local game outlet
- Could result in the loss of skilled labour and tradesmen
- Valuable service to the community and local businesses
- Sustainable business
- Local employer
- Re-use of an existing building

4. HOW THE PROPOSED COURSE OF ACTION WILL PROMOTE HUMAN RIGHTS

4.1 Article 8 (Right to respect of a Private and Family Life) and Article 1 of the First Protocol (Protection of Property) of the Human Rights Act 1998 are relevant to this application, Consideration of Human rights forms part of the planning assessment below.

5. HOW THE PROPOSAL WILL HELP TO REDUCE CRIME AND DISORDER

5.1 It is not considered that the development would be likely to have any significant impact on crime and disorder.

6. PLANNING ASSESSMENTS

- 6.1 The application seeks full planning permission for the change of use of the 2no. building to provide for the processing, packaging and distribution of game meat (a sui generis use) and associated office accommodation.

Principle of Development

- 6.2 Policy 10 of the Horsham District Planning Framework (HDPF) states, in part, that sustainable rural economic development and enterprise within the District will be encouraged in order to generate local employment opportunities and economic, social and environmental benefits for local communities. In the countryside, development which maintains the quality and character of the area, whilst sustaining its varied and productive social and economic activity will be supported in principle.
- 6.3 In addition, Policy 26 of the HDPF states that outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to its countryside location, and in addition meet one of the following criteria: support the needs of agriculture or forestry; enable the extraction of minerals or the disposal of waste; provide for quiet informal recreational use; or enable the sustainable development of rural areas. In addition, proposals must be of a scale appropriate to its countryside character and location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside, and protects, and/or conserves, and/or enhances, the key features and characteristics of the landscape character area in which it is located.
- 6.4 The Planning Statement outlines that Chanctonbury Game has operated for over 20 years and is one of only two licensed approved dealers in West Sussex. The business initially processed game on an individual level, but in later years has grown to processing game for many of the local shoots within the South Downs area. As surplus from shoots became available, the Applicant began purchasing this meat and selling it to local markets. The business now primarily acts as a fully licensed processing establishment, focusing on the processing and sale of fowl and venison to local wholesalers, restaurants and pubs, as well as internationally. It is outlined that the business now processes in excess of 40,000 birds and 1,000 venison carcasses a year.
- 6.5 The proposal seeks to relocate the established rural business to a new site within Horsham District, where it would continue to provide local employment and generate economic benefits for local communities. The proposal would be contained within a building suitable of conversion and would contribute to the rural economy; and would consequently sustain the varied and productive economic activity in the locality. The proposal is therefore considered to result in social and economic benefits that would weigh in favour of the proposal.
- 6.6 While the proposal has the potential to increase the level of activity in the countryside, it is recognised that the proposal relates to a countryside-based enterprise that supports the needs of the rural community. The proposed use would take place within the confines of an existing building, with the nature of such use likely comparable to the former agricultural activity taking place on the wider site. On the balance of these considerations, it is not therefore considered that the proposal would result in a significant increase in the overall level of activity in the countryside.
- 6.7 The proposal would result in social and economic benefits and would support and contribute to the wider rural economy. The proposal would be located within an established building suitable for conversion, and would sustain the countryside-based enterprise. For these reasons, the proposed development is considered acceptable in principle, subject to the detailed consideration of all other planning matters, including the amenity of nearby residential properties.

Design and Appearance

- 6.8 Policies 25, 32, and 33 of the HDPF promote development that protects, conserves and enhances the landscape character from inappropriate development. Proposal should take into account landscape characteristics, with development seeking to provide an attractive, functional and accessible environment that complements the locally distinctive character of the district. Buildings should contribute to a sense of place, and should be of a scale, massing, and appearance that is of a high standard or design and layout which relates sympathetically to the landscape and built surroundings.
- 6.9 Paragraph 130 of the NPPF states that planning decisions should ensure that developments function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting; establish a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and create places that are safe, inclusive and accessible.
- 6.10 The proposed development seeks to convert the existing buildings, with internal alterations to re-configure the floor layout to accommodate the various processing spaces required. External alterations to repair and replace the existing cladding, windows and doors are proposed. This would include the addition of 2no. roller doors on the northern elevation.
- 6.11 The proposed alterations would retain the utilitarian character of the existing building, with no alterations to the form or massing. As such, the proposal is considered to maintain the character of the rural building and result in no further harm to the landscape character and visual amenity of the site and wider surroundings. The proposal is therefore considered to accord with Policies 25, 32, and 33 of the Horsham District Planning Framework (2015).

Amenity Impacts

- 6.12 Policy 32 of the HDPF states that development will be expected to provide an attractive, functional, accessible, safe, and adaptable environment that contributes a sense of place both in the buildings and spaces themselves. Policy 33 continues that development shall be required to ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land.
- 6.13 Paragraph 130 of the NPPF states that planning decisions should ensure that developments will function well and add to the overall quality of the area; establish or maintain a strong sense of place to create attractive and welcoming places; and create places that are safe, inclusive and accessible, with a high standard of amenity of existing and future users. Paragraph 174 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by "...preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability..." Paragraph 187 furthers that planning decisions should ensure that new development can be integrated effectively with existing businesses and community facilities. Where the operation of an existing business or community facility could have a significant adverse effect on new development in its vicinity, the Applicant should be required to provide suitable mitigation. Paragraph 183 of the NPPF continues that "the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions."
- 6.14 Residential amenity for the purposes of planning does not focus solely on whether a statutory noise nuisance would occur as a result of the proposed development, but rather gives

consideration to other forms of disturbance. Significant loss of amenity will often occur at lower levels of emission than would constitute a statutory nuisance. It is therefore important for planning authorities to consider properly, loss of amenity from noise in the planning process in a wider context and not just from the limited perspective of statutory nuisance.

- 6.15 The Design and Access Statement outlines that game birds and some venison are dropped off at the site, with most venison picked up from site by the Applicant. As a seasonally based business, the number and frequency of vehicle movements and deliveries fluctuates throughout the year. On average, there are approximately 5/6 vehicle movements a week, and an additional 2/3 vehicles a week carried out by the Applicant. The Applicant transports the finished products to local farmers markets, and this is transferred by van, with the deliveries to wholesalers carried out by van or arctic lorry (subject to export) between the hours of 8am and 7pm, but not continuously. From August to December, a loaded van would leave the site on Tuesday at approximately 10am and would return at approximately 3am the next day, and this would become more frequent (possibly 3/5 times a week) as it gets closer to Christmas.
- 6.16 The Statement outlines that waste is picked up and disposed of by registered waste companies (Gibbs Waste Ltd and Harry Hawkins). Bird and bone waste is stored in 240 litre bins and kept in the fridge until collection where it is moved outside for pick-up. Collection is usually on a Monday morning, and dependent on weather, the bins may be left outside from September onwards, but they are sprayed down to prevent blow flies and odour. This waste is generally picked up by lorry at approximately 6am. Fur and guts are stored in 1100 litre bins and picked up twice a week, usually on a Tuesday and Friday, and sometime during the day (not usually after 5pm).
- 6.17 The application site has most recently been used as a racing stable for up to 22no. horses, and formerly was in use for agricultural purposes. It is recognised that these uses generate a level of activity and frequency of vehicle movements that have the potential to result in noise and disturbance, particularly to the nearby residential properties. This existing context is of relevance when weighing the impacts and implications of the proposed development.
- 6.18 The proposed use does however have the potential to result in a number of vehicle movements and level of general activity that could adversely impact on the amenity of nearby residential properties. In particular, it is likely that the proposal would involve a high frequency of vehicle movements, of a variety of sizes, to accommodate delivery, dispatch, and waste removal. While it is recognised that the former use for agriculture and as a racing stable would likely have produced a relatively high frequency of vehicle movements, no comparative information has been provided. Notwithstanding this, it is likely that the vehicle traffic associated with the equestrian use would primarily have comprised horse trailers and horse boxes. In contrast, the supporting documents outline that the dispatch, delivery and waste vehicles associated with the proposed use would be of a range of sizes, including arctic lorries. These movements would occur throughout the day and week, and would take place in the early hours and early evenings.
- 6.19 Following consultation with the Environmental Health Officer, it is recognised that the proposed activities have the potential to impact upon the adjacent residential properties. A number of conditions have been recommended to mitigate potential harm to neighbouring occupiers, including restrictions on hours of use and hours of deliveries. While it is recognised that restrictions on the hours of operation and deliveries would impact the operation of the business, which has sought permission for deliveries in the early hours of the morning (3am to 6am), it is recognised that the proposal would be located in immediate proximity to a number of residential properties. This is a material consideration of significant weight, particularly as all vehicle movements would pass in close proximity to these residential properties. Given the low ambient noise level in this location, and coupled with the early hours as proposed, it is likely that the associated vehicle movements would be recognisable from the residential dwellings, and this has the potential to result in harm. For

these reasons, it is considered reasonable and necessary to impose conditions to limit operations and delivery movements to more reasonable hours to reflect the constraints of the site. This would reduce the impact and would overcome concerns regarding potential noise and disturbance to the nearby residential properties.

- 6.20 While recognised that the proposal would result in additional activity and vehicle movements when compared with the existing situation, the proposal is not considered to result in a material intensification above the previous uses of the site. This is a material consideration of significant weight in the assessment of the current application. Subject to the recommended conditions, the proposed development is considered to result in no further harm to the amenities and sensitivities of neighbouring residential properties, in accordance with Policies 32 and 33 of the Horsham District Planning Framework (2015).

Highways Impacts

- 6.21 Policies 40 and 41 of the HDPF promote development that provides safe and adequate access, suitable for all users.
- 6.22 Paragraph 111 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Paragraph 110 continues that within this context, development should allow for the efficient delivery of goods, and access by service and emergency vehicles.
- 6.23 The application site is accessed from an existing private track which serves a number of residential properties, as well as the subject building and adjacent agricultural buildings. This is a single access track, albeit that passing places are available; with the subject building including areas of hardstanding to the east and west of the building. Access to the east of the building is provided by a track which runs along the northern perimeter. The proposal seeks to utilise this existing access, which passes in close proximity to a number of residential dwellings. Swept-path analysis has been provided for an estate car, an emergency fire vehicle, and a rigid vehicle.
- 6.24 The proposal has the potential to introduce a number of vehicle movements of various sizes, all of which would be channelled along a narrow private track. While recognised that this track has formerly been used for agricultural and equestrian purposes, it is necessary to demonstrate that safe and adequate access can be provided for all users.
- 6.25 Following consultation with WSCC Highways, it is not anticipated that the proposed change of use would give rise to a material intensification of movements to or from the site when compared against the existing use. An inspection of collision data provided to WSCC by Sussex Police from a period of the last five years reveals no recorded injury accidents attributed to road layout within the vicinity of the site. Therefore, there is no evidence to suggest the existing access is operating unsafely or that the proposal would exacerbate an existing safety concern. Furthermore, the swept path tracking demonstrates that there is sufficient space on-site for parking and unloading of lorries and vans, and no concerns are raised in this regard. The Local Highways Authority therefore does not consider that the proposal would have an unacceptable impact on highway safety or result in severe cumulative impacts on the operation of the highway network.
- 6.26 It is recognised that concerns have been raised in respect of the potential frequency of vehicle movements and the access arrangement from the A24. However, in light of the comments from the Local Highways Authority, it is not considered that the proposal result in harm to the function and safety of the highway network, in accordance with Policies 40 and 41 of the Horsham District Planning Framework (2015).

Water Neutrality

- 6.27 Horsham District is supplied with water by Southern Water from its Sussex North Water Resource Zone. This supply is sourced from abstraction points in the Arun Valley, which includes locations such as Amberley Wild Brooks Site of Special Scientific Interest (SSSI), Pulborough Brooks SSSI and Arun Valley Special Protection Area/Special Area of Conservation and Ramsar site.
- 6.28 On 14 September 2021, the council received a Position Statement from Natural England. The Natural England position is that it cannot be concluded that the existing abstraction within the Sussex North Water Supply Zone is not having an impact on the Arun Valley sites. It advises that development within this zone must not add to this impact.
- 6.29 The Position Statement is a new material consideration, and if an application cannot demonstrate water neutrality is reasonably achievable, this will mean the development will not meet the requirements of section 63 of the Habitats Regulations.
- 6.30 The Applicant has submitted a Water Neutrality Statement demonstrating the existing water consumption of the site and the water consumption levels of the proposed use. The Statement has demonstrated that the existing use for equestrian purposes as a racing stable has a greater water consumption than the proposed use for the processing of game, and this has been evidenced through the submission of previous Water Utility Bills. The grant of planning permission would not therefore adversely affect the integrity of these sites or otherwise conflict with Policy 31 of the HDPF, NPPF paragraph 180 and the Council's obligations under the Conservation of Habitats and Species Regulations 2017.

Climate change

- 6.31 Policies 35, 36 and 37 require that development mitigates to the impacts of climate change through measures including improved energy efficiency, reducing flood risk, reducing water consumption, improving biodiversity and promoting sustainable transport modes. These policies reflect the requirements of Chapter 14 of the NPPF that local plans and decisions seek to reduce the impact of development on climate change.
- 6.32 Should the development be approved, the following measures to build resilience to climate change and reduce carbon emissions would be secured by condition:
- Water consumption limited to 110litres per person per day
 - Requirement to provide full fibre broadband site connectivity
 - Dedicated refuse and recycling storage capacity
 - Cycle parking facilities
 - Electric vehicle charging points
- 6.33 Subject to these conditions the application will suitably reduce the impact of the development on climate change in accordance with local and national policy.

Conclusions

- 6.34 The proposed development would be located within an established building suitable for conversion, and would sustain the established countryside-based enterprise. The proposal would result in social and economic benefits in this regard and would support and contribute to the wider rural economy. These are material considerations that weigh in favour of the proposal.
- 6.35 While recognised that the proposed development would introduce a greater intensity of activity and vehicle movements when compared to the existing situation on-site, the proposal is not considered to result in a material intensification when compared to the established equestrian/agricultural uses. Conditions to control noise, disturbance and odour are

recommended, including restrictions on operating hours, delivery hours, and waste management. These are considered reasonable and necessary to mitigate potential amenity conflict, and subject to such conditions, it is not considered that the proposal would result in material harm to the amenities and sensitivities of the nearby residential properties to the north-east. Furthermore, it has been sufficiently demonstrated that the proposed development would result in no further intensification in use of the access, with vehicle parking and turning considered to meet the anticipated needs.

- 6.36 On the balance of these considerations, the proposed development is considered acceptable, in accordance with all relevant local and national planning policies.

COMMUNITY INFRASTRUCTURE LEVY (CIL)

- 6.37 Horsham District Council has adopted a Community Infrastructure Levy (CIL) Charging Schedule which took effect on 1st October 2017.
- 6.38 **It is considered that this development constitutes CIL liable development.** At the time of drafting this report the proposal involves the following:

Use Description	Proposed	Existing	Net Gain
	553.3	553.3	0
	Total Gain		
	Total Demolition		

- 6.39 Please note that exemptions and/or reliefs may be applied for up until the commencement of a chargeable development.
- 6.40 In the event that planning permission is granted, a CIL Liability Notice will be issued thereafter. CIL payments are payable on commencement of development.

7. RECOMMENDATIONS

- 7.1 To approve the application subject to the following conditions.
Conditions:

- 1 **Approved Plans**
- 2 **Standard Time Condition:** The development hereby permitted shall begin before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990.

- 3 **Pre-Commencement Condition:** No development shall commence until a drainage strategy detailing the proposed means of foul and surface water disposal has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved scheme.

Reason: As this matter is fundamental to ensure that the development is properly drained and to comply with Policy 38 of the Horsham District Planning Framework (2015).

- 4 **Pre-Occupation Condition:** No part of the development hereby permitted shall be occupied until a Waste Management Plan has been submitted and approved in writing by the Local

Planning Authority. The Plan shall include but not be limited to, the location and storage of waste prior to collection, the location of waste on day of collection, and measures to control and minimise odour from waste at the site. The Waste Management Plan shall be implemented and complied with thereafter for the duration of the use.

Reason: In order to ensure that the safe operation of the development and to protection of the amenities of nearby residents, in accordance with Policies 33 and 40 of the Horsham District Planning Framework (2015).

- 5 **Pre-Occupation Condition:** No internally and/or externally located plant, machinery equipment or building services plant shall be operated until an assessment of the acoustic impact arising from the operation of all such equipment has been undertaken and has been submitted to and approved in writing by the Local Planning Authority. The assessment shall be undertaken in accordance with BS 4142:2014 and shall include a scheme of attenuation measures to mitigate any adverse impacts identified in the acoustic assessment and ensure the rating level of noise emitted from the proposed building services plant is no greater than background levels. The scheme as approved by the Local Planning Authority shall be fully installed prior to first operation of the plant and shall be retained as such thereafter.

Reason: To safeguard the amenities of the nearby residential properties to the north-west and in accordance with Policy 33 of the Horsham District Planning Framework (2015).

- 6 **Pre-Occupation Condition:** No part of the development hereby permitted shall be occupied until the parking, turning and access facilities necessary to serve the approved use have been implemented in accordance with the approved details as shown on plan 2021-6336-000 rev A and shall be thereafter retained as such.

Reason: To ensure adequate parking, turning and access facilities are available to serve the development in accordance with Policy 40 of the Horsham District Planning Framework (2015).

- 7 **Pre-Occupation Condition:** No part of the development hereby permitted shall be occupied until a scheme for the provision of electrical vehicle charging points has been submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be installed prior to first occupation of the development and shall thereafter remain as such.

Reason: To provide electric vehicle car charging space for the use in accordance with Policies 35 and 41 of the Horsham District Planning Framework (2015) and the WSCC Parking Standards (2019).

- 8 **Pre-Occupation Condition:** No part of the development hereby permitted shall be occupied until details of secure and covered cycle parking facilities for the occupants of, and visitors to, the development have been submitted to and approved in writing by the Local Planning Authority. No use hereby permitted shall be occupied or use hereby permitted commenced until the approved cycle parking facilities associated with that dwelling or use have been fully implemented and made available for use. The provision for cycle parking shall thereafter be retained for use at all times.

Reason: To ensure that there is adequate provision for the parking of cycles in accordance with Policy 40 of the Horsham District Planning Framework (2015).

- 9 **Pre-Occupation Condition:** No part of the development hereby permitted shall be occupied until the necessary in-building physical infrastructure and external site-wide infrastructure to enable superfast broadband speeds of 30 megabytes per second through full fibre broadband connection has been provided to the premises.

Reason: To ensure a sustainable development that meets the needs of future occupiers in accordance with Policy 37 of the Horsham District Planning Framework (2015).

- 10 **Regulatory Condition:** The materials and finishes of all new external walls, windows and roofs of the development hereby permitted shall match in type, colour and texture those of the existing building.

Reason: In the interests of visual amenity and in accordance with Policy 33 of the Horsham District Planning Framework (2015).

- 11 **Regulatory Condition:** The premises hereby permitted shall be used for the processing, preparation and packaging of game meat only and for no other purpose.

Reason: Changes of use as permitted by the Town and Country Planning (General Permitted Development) Order or Use Classes Order 1987 are not considered appropriate in this case due to (insert with reasons) under Policy 33 of the Horsham District Planning Framework (2015).

- 12 **Regulatory Condition:** The premises shall not be open for trade or business except between the hours of 07:00 hours to 19:00 hours Mondays to Fridays and 08:00 hours to 13:00 hours on Saturdays nor at any time on Sundays, Bank or public Holidays

Reason: To safeguard the amenities of adjacent occupiers in accordance with Policy 33 of the Horsham District Planning Framework (2015).

- 13 **Regulatory Condition:** No deliveries to or from the site in connection with the development hereby approved shall take place outside of 08:00 hours to 18:00 hours Mondays to Fridays and 08:00 hours to 13:00 hours on Saturdays nor at any time on Sundays, Bank or public Holidays

Reason: To safeguard the amenities of adjacent occupiers in accordance with Policy 33 of the Horsham District Planning Framework (2015).

- 14 **Regulatory Condition:** No external storage of any materials or waste shall take place at any time.

Reason: To safeguard the amenities of the locality in accordance with Policies 32 and 33 of the Horsham District Planning Framework (2015).

- 15 **Regulatory Condition:** No external lighting or floodlighting shall be installed other than with the permission of the Local Planning Authority by way of formal application.

Reason: In the interests of the amenities of the locality and in accordance with Policy 33 of the Horsham District Planning Framework (2015).