

7th August 2026

Mid Sussex District Council
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Dear Sir / Madam

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
APPLICATION FOR FULL PLANNING PERMISSION AT UNIT 16, THE BIRCHES INDUSTRIAL ESTATE, EAST GRINSTEAD, RH19 1XZ

We write on behalf of Royal London Mutual Insurance Society Limited C/O Royal London Property Pension Fund, *'the Applicant'*, to apply for full planning permission for the following flexible change of use at Unit 16, The Birches Industrial Estate, East Grinstead, RH19 1XZ *'the Site'*:

"Change of Use of Existing Industrial Unit from Use Class B8 to flexible employment Use Class E(g) (ii), E (g) (iii), B2 and B8"

The purpose of this application is to provide the utmost flexibility for an industrial unit within an Existing Employment Site that has experienced a period of vacancy under its current lawful Use Class B8. The applicant has been proactive in seeking to secure a new tenant, with active marketing since March 2025¹. This planning application is therefore necessary to ensure the asset, which currently achieves an EPC rating A, is well positioned to actively contribute to employment-generating uses within one of Mid Sussex District Council's (*'MSDC'*) designated Existing Employment Sites.

We enclose the following documentation to support this planning application:

- Covering Letter to be read as Planning Statement
- Application form
- Site Location Plan
- Existing and Proposed Drawings
- Noise Impact Assessment

The planning application fee of **£701.00** (inclusive of VAT and service charge) has been paid by online electronic payment via the Planning Portal website (Ref. PP- 15047215).

¹ www.thebirchesindustrialestate.co.uk

The Site and Surrounding Context

Unit 16 is an existing industrial warehouse located on the north side of Hills Road, within the Birches Industrial Estate (Figure 1). The application site extends to circa 3900sqm and falls within the East Grinstead Imberhorne ward under the jurisdiction of Mid Sussex District Council ('MSDC').



Figure 1 - Satellite View of the Site (Google Maps, 2026)

The lawful use of the unit is Use Class B8, in accordance with the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020

To the north, east, and south, the site is bounded by two- and three- storey industrial buildings accommodating industrial and logistics uses. Residential properties are located to the to the northeast of the site.

The site is not located within a conservation area, does not contain any listed buildings, and there are no listed buildings in its vicinity.

The application site is located on a long-established industrial estate within an Existing Employment Site (Birches Industrial Estate). The site lies within the Ashdown Forest 7km Zone of Influence, but does not contain any trees or TPOs.

The character of the area is defined by industrial buildings and employment-generating uses. The nearest residential dwellinghouses are located approximately 30m to the northeast of the site, along Stream Park.

The Birches Industrial Estate is located approximately 1.8 kilometres north-west of East Grinstead town centre and approximately 9 kilometres east of Gatwick Airport. The site benefits from close proximity to the A264, and provides 20 car parking spaces and 8 cycle parking spaces.

East Grinstead railway station is located approximately 1.75 kilometres south-east of the site, measured by straight-line distance, and provides services to London via Southern Railway, with half-hourly services to London Victoria.

The site is well served by local bus services, with bus stops located within approximately 500m of the site on both London Road and Imberhorne Lane. These bus stops provide onward connections to Crawley, Gatwick, and Tunbridge Wells, with services running every 30 minutes to hourly.

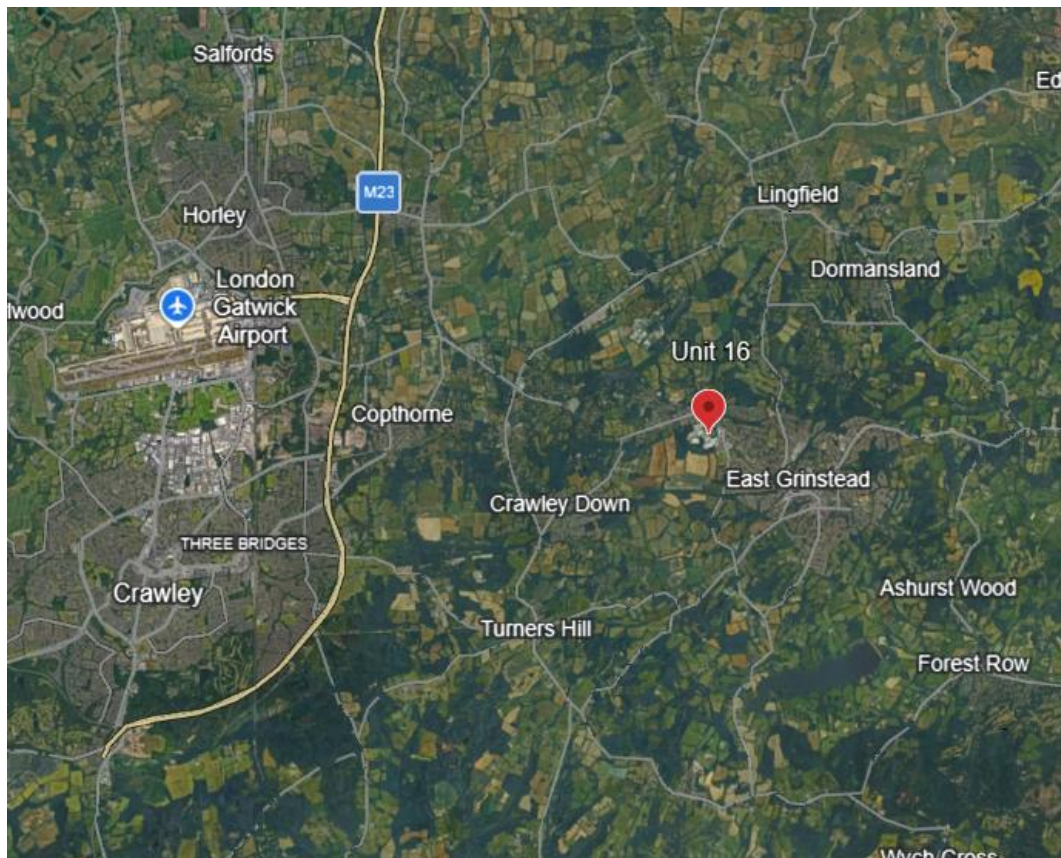


Figure 2 - Strategic Site Context

The site is located within Flood Zone 1, in accordance with the Environment Agency's Flood Map for Planning (2025).

Planning Policy Context

The statutory development plan relating to the Site comprises the Mid Sussex District Plan 2014-2031 (adopted March 2018) and associated Policy Map (adopted June 2022), the West Sussex Joint Minerals Local Plan (adopted 2018), and the West Sussex Waste Local Plan (adopted 2014). Regard should also be given to the Government's National Planning Policy Framework (NPPF, 2024).

There are no Article 4 Directions imposed on the Site which are pertinent to this application.

The Site is subject to the following designations on the Mid Sussex District Plan Policy Map (2022):

- SA34 – Existing Employment Site (SA34)
- Birches Industrial Estate
- Ashdown Forest 7km Zone of Influence
- Built Up Area Boundary
- Policy SS4 – East Grinstead Neighbourhood Plan site allocation

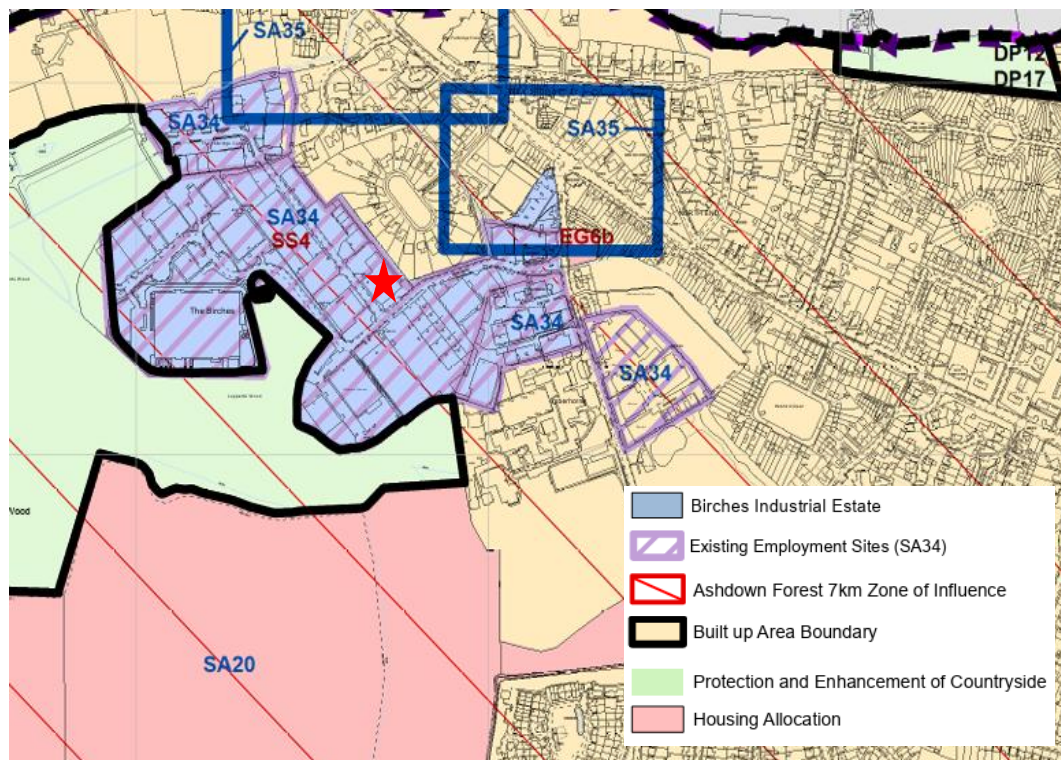


Figure 3 - Extract of Policy Map (2026) with the Site indicated by red Star

Relevant Planning History

A desk-based planning history search of MSDC's online statutory register of planning applications has been undertaken.

The planning history of the Site reflects the industrial nature of the property and employment generating nature of the wider Industrial Estate. A summary of the available online planning records is shown in the below **Table 1** and **Table 2**.

Table 1 – Unit 16, The Birches Industrial Estate Relevant Planning History

Application Reference	Description	Decision
DM/25/1126	Minor external refurbishment works to enhance the appearance of the buildings, consisting of new timber cladding and decorative paint finish to doors, windows and entrance canopy.	Approved 20/06/2025

03/00581/COU	Change of use from Class B1 (Business) to Class B1 (Business) and B8 (Storage).	Approved 12/06/2003
02/00726/FUL	Alterations to external elevations.	Approved 23/08/2002
GR/336/99	Temporary bulk storage container outside the rear of unit 16.	Approved 20/01/2000
GR/049/96	Renewal of temporary permission for the retention of storage shed used for storing and packing materials (GR/43/91).	Approved 17/05/1996
GR/085/96	A porch to cover the front entrance to building.	Approved 09/05/1996
GR/043/91	Retention of storage shed used for storing packing materials and stainless steel swarf, formerly used as bicycle and motor cycle shelter.	Approved 21/03/1991
GR/095/86	Retention of building and change of use from cycle shed to storage.	Approved 01/05/1986
GR/169/85	To fit windows at high level on two sides of factory building for additional natural light.	Approved 09/08/1985
GR/336/81	Increase car parking space.	Approved 06/01/1982
GR/053/81	Renewal of planning permission to erect shelter for cycles and motor cycles belonging to employees.	Approved 18/03/1981
GR/224/78	Erection of shelter to house emergency power generator and oil tank.	Approved 31/10/1978

The site has an established planning history comprising industrial, storage, and ancillary operational development. A key consent was granted under application 03/00581/COU in 2003 for the change of use from Class B1 (Business) to a mixed B1 and B8 (Storage) use, which established the current operational use of the site. More recently, application DM/25/1126 was approved on 20/06/2025 for minor external refurbishment works to enhance the appearance of the buildings, including new timber cladding and decorative paint finishes to doors, windows and the entrance canopy.

The wider planning history also includes a number of permissions for minor operational and external works, including alterations to external elevations, entrance canopy works, additional windows, increased car parking, storage structures, cycle shelters, and associated ancillary storage and plant facilities.

The surrounding planning history (See Table 2) demonstrates a pattern of flexible employment uses within the Birches Industrial Estate. Permissions on nearby sites, including within the estate, have consistently supported mixed and interchangeable industrial, warehousing and business uses (Classes B2, B8 and E(g)(ii-iii)), reflecting the estate's operational character.

Table 2 - Relevant Surrounding Planning History

Address and Application Reference	Description	Decision
Unit 12, Birches Industrial Estate, RH19 1XZ DM/19/1796	Change of use from B2 (Light Industrial) to D2 (Leisure) as an indoor climbing wall.	Approved 10/07/2019
Unit 13, Birches Industrial Estate, RH19 1XZ DM/19/1449	Continued use of premises in Use Class B2 (General Industrial) and the external installation of four flues, and a new pedestrian entrance to the front elevation.	Approved 07/06/2019
Units 2A and 6, The Felbridge Centre, Birches Industrial Estate, RH19 1XP DM/17/3788	Change of Use of unit 2A and unit 6 from Class B1 to Class B8	Approved 06/11/2017
The Felbridge Centre, Birches Industrial Estate, RH19 1XP DM/17/3207	To allow the flexible Class B1 (b) and/or (c), Class B2 and/or Class B8 use of Units 1-11 (inclusive) at the Felbridge Centre	Withdrawn 19/09/2017
Unit 3B, Birches Industrial Estate, RH19 1XZ DM/17/0597	Change of Use from B1/B8 (Storage/Distribution) to D2 (Gym).	Approved 29/03/2017
Unit 23, Birches Industrial Estate, RH19 1XZ DM/16/3634	Change of use from storage and distribution to A1 retail, adding an extra 950 sq meters of mezzanine floor	Withdrawn 30/11/2016
Unit 11, The Felbridge Centre, Birches Industrial Estate, RH19 1XP DM/15/5127	Retrospective change of use from B1 (office) to B2 (meat preparation).	Approved 01/03/2016
Unit B, Birches Industrial Estate, RH19 1XZ 14/00720/FUL	External alterations to existing warehouse (Class B8/B1(c)) and part change of use to a builders' merchant (sui generis) for display, sale and storage of building, timber and plumbing supplies, plant and tool hire including outside display and storage; and associated works.	Approved 22/04/2014
Unit 4, Birches Industrial Estate, RH19 1XZ 10/02086/COU	Change of use of Unit 4 to Use Class B1c (light industrial) or B8 (Storage and Distribution).	Approved 08/10/2010

Unit 3, Birches Industrial Estate, RH19 1XZ 10/02086/COU	Change of use of Unit 3 to Use Class B1c (light industrial) or B8 (Storage and Distribution).	Approved 08/10/2010
Unit 3A, Birches Industrial Estate, RH19 1XZ 10/02086/COU	Change of use of Unit 3A to Use Class B1c (light industrial) or B8 (Storage and Distribution).	Approved 08/10/2010

Previous planning approvals further confirm the acceptability of such flexibility in response to changing market demand. Planning permissions 10/02086/COU, 10/02087/COU and 10/02088/COU have historically provided flexibility for individual units across the estate, while current market conditions, *(particularly in light of the prolonged period of vacancy at Unit 16, despite the unit achieving an EPC rating of A)*, demonstrate the need for even greater flexibility to support its long-term occupation and viability.

Furthermore, alternative approaches have been supported through recent approvals under application references DM/19/1796 and DM/17/0597, which permitted changes of use from employment to leisure uses (a climbing wall and gym respectively). These uses have contributed to the overall attractiveness and vitality of the industrial estate for existing and future occupiers. The associated officer reports considered the loss of employment use to be acceptable, having regard to the absence of any physical loss of floorspace, the prolonged vacancy of the units, the continued provision of employment opportunities, and the delivery of a productive economic use for the premises.

Unit 16 has also experienced a period of prolonged vacancy (since January 2025) and a change of use is sought to attract a broad range of employment occupiers, ensuring that the estate is in a strong position to attract new tenants to the designated Existing Employment Site.

Application ref. DM/19/1449 received approval for the continuation of Class B2 at Unit 13.

In this context, the proposed change of use would align with the established character of the area, support the retention of employment generating uses within the industrial estate, and enable the efficient use of Unit 16 to meet evolving business needs.

The Development Proposal

Full planning permission is sought for:

“Change of Use of Existing Industrial Unit from Use Class B8 to flexible employment Use Class E(g) (ii), E (g) (iii), B2 and B8.”

The proposed change of use will introduce greater flexibility in employment uses, supporting the continued employment-generating function of the site. Greater flexibility in use classes is required to improve the marketability of the unit, support the operational needs of future occupiers, and maintain the site’s ongoing economic function. The proposal is limited to a change of use only and would not alter the appearance of the existing building.

No internal or external alterations to the existing buildings or site layout are proposed as part of this planning application.

Overall, the proposed change of use is consistent with the Existing Employment Site designation of the site and the surrounding Birches Industrial Estate and will support the unit’s return to productive use.

Relevant Planning Policy

This section provides an overview of national, regional, and local planning policy framework and other material planning considerations against which the planning application will be assessed.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise.

The Statutory Development Plan relating to the Site comprise:

- The Mid Sussex District Plan 2014-2031 (adopted March 2018) and associated Policy Map;
- The East Grinstead Neighbourhood Plan (adopted November 2016);
- The West Sussex Joint Minerals Local Plan (adopted 2018);
- The West Sussex Waste Local Plan (adopted 2014).

Regard should also be had to the following material considerations in the determination of the planning application: The Government’s National Planning Policy Framework (NPPF, 2024); and The Government’s National Planning Policy Guidance (NPPG, 2014 as amended). Regard should also be had to material considerations contained within Supplementary Planning Documents and Guidance (SPDs and SPGs) produced by MSDC.

Mid Sussex District Plan (2018)

A review of the Mid Sussex District Plan has been undertaken, and the following policies have been found of relevance to the proposals.

Economy

Policy DP1 (Sustainable Economic Development) seeks to protect existing employment floorspace, and supports development involving the intensification, redevelopment, and conversion for employment uses. The policy highlights the need for development to meet the needs of modern businesses.

Amenity

Policy DP26 (Character and Design) states that development should 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.

Policy DP29 (Noise, Air and Light Pollution) seeks to protect the amenity of neighbouring properties and the surrounding area from unacceptable levels of noise, light, and air pollution.

Transport

Policy DP21 (Transport) supports development in sustainable locations, and where adequate car parking is provided in line with the West Sussex County Council parking guidance.

East Grinstead Neighbourhood Plan (2016)

A review of the East Grinstead Neighbourhood Plan has been undertaken, and the following policies have been found of relevance to the proposals.

Economy

Policy EG10 (Employment Provision) supports the redevelopment, extension or alteration of existing employment premises, provided development does not severely impact the transport network.

Policy SS4 (Birches Industrial Estate) supports employment related development within the Birches Industrial Estate. Permission will be granted for extensions to existing buildings or the creation of new employment related development subject to the following criteria:

- “(1) The proposals are accompanied by a landscape strategy for the site;*
- (2) The proposals meet the adopted parking standards;*
- (3) Appropriate highway and infrastructure mitigation is provided;*
- (4) Proposals for new development include a proportion of smaller start up units for new business use; and*
- (5) Where possible an additional highway access should be provided to the north to alleviate pressure on vehicles turning from the A22 southbound onto the current access road and the agreement of the Highway Authority will be required.”*

The supporting text to the policy highlights the importance of providing additional development within the existing estate in the future to provide “flexibility and choice of sites for firms wishing to relocate to, or move within, the town”, and identifies Birches Industrial Estate as the most appropriate location for such development.

Amenity

Policy EG3 (Promoting Good Design) states that the layout of proposed development should not harm adjoining amenity.

Mid Sussex District Plan Review

The Mid Sussex District Plan Review was submitted to the planning inspectorate on 8 July 2024. Following comments from the Inspector and publication of additional sites for testing, further examination hearings are expected to take place in November 2026.

Given the indicative timeline, it is therefore considered that the Plan Review is of limited weight and is not considered further in this assessment.

Planning Policy Assessment

Principle of Use

The proposal seeks a change of use from Use Class B8 to flexible employment uses within Classes E(g)(ii), E(g)(iii), B2, and B8. The objective is to improve the marketability of Unit 16 for future occupiers, ensuring that it makes a valuable contribution to the Council’s sustainable economic development objectives and safeguards the long-term vitality of Birches Industrial Estate.

The application site lies within Birches Industrial Estate, a designated Existing Employment Site. Policy DP1 of the District Plan supports the appropriate intensification and conversion of employment uses to meet the needs of modern businesses. By introducing flexible use classes within an employment-generating use, the proposal directly supports MSDC’s objectives of promoting a wide range of employment opportunities, attracting new business occupiers, and enabling sites to adapt to evolving employment requirements. The change of use application should therefore be supported in principle.

The planning history of Birches Industrial Estate demonstrates a consistent and established approach towards providing flexibility for individual units in response to changing market demands and occupier requirements. Planning permissions 10/02086/COU, 10/02087/COU and 10/02088/COU historically granted flexible use permissions across individual units within the estate, recognising the need to support the ongoing occupation and viability of the premises.

The current proposal for Unit 16 follows this established approach. In light of the unit’s prolonged vacancy despite achieving an EPC rating of A, the proposed flexible change of use is intended to provide the adaptability necessary to respond to current market conditions and secure the unit’s return to a productive economic use.

This approach is further supported by more recent permissions within the estate, including application references DM/19/1796 and DM/17/0597, which approved changes from traditional employment uses to leisure uses. These permissions demonstrate the Council’s acceptance of alternative and flexible uses where they support occupancy, vitality and the continued economic function of the estate.

Policy DP1 of the District Plan and Policy SS4 of the Neighbourhood Plan seek to retain employment uses within existing employment areas. Unit 16 has experienced a prolonged period of vacancy and difficulties in securing a tenant under its existing B8 use. The proposed change of use directly supports these policy objectives by retaining the site in employment use while providing the flexibility needed to attract tenants in a challenging market.

The planning history of the wider Birches Industrial Estate also establishes a precedent for flexible use class permissions, with a range of uses operating across the wider estate.

The Northern West Sussex Economic Growth Assessment for Mid Sussex (2026) identifies a need for additional Class E(g) and B8 floorspace within the district, further supporting the proposed flexible change of use. This flexibility would allow the site to respond effectively should industrial market demand fluctuate. The proposal is therefore consistent with both the identified economic need and the statutory development plan. The application would provide approximately 3,900 sq m of employment floorspace for flexible uses, directly aligning with District Plan Policy DP1 and ensuring that the site continues to contribute to local economic objectives.

Amenity

District Plan Policies DP26 and DP29, together with Neighbourhood Plan Policy EG3, require development to avoid unacceptable impacts on the amenity of existing and future occupiers, particularly in respect of noise, air quality, lighting, and land contamination.

The site is located within Birches Industrial Estate, a designated Existing Employment Site, surrounded by established industrial and employment-generating uses, with residential properties located to the east and north-east at Stream Park.

The proposed flexible change of use from Class B8 to Classes E(g)(ii), E(g)(iii), B2, and B8 would not materially alter the prevailing environmental conditions within the estate. The proposal involves no changes to the building footprint or servicing arrangements, and the site would continue to operate within an established industrial and commercial context.

A Noise Impact Assessment prepared by SLR Consulting concludes that the proposed development would result in a “low impact” at the nearest noise-sensitive receptors, with predicted rating levels remaining below representative background sound levels during both daytime and night-time periods. The assessment further confirms that the likely acoustic effects would remain below the Lowest Observed Adverse Effect Level (LOAEL), such that the proposal would not result in any perceptible change to residents’ quality of life.

The assessment also acknowledges that the surrounding acoustic environment is already influenced by existing industrial operations, HGV movements, and commercial activity within the estate, and concludes that the proposed uses would not be out of character with the prevailing environment.

Accordingly, the proposal would not give rise to unacceptable amenity impacts and is considered to accord with District Plan Policies DP26 and DP29 and Neighbourhood Plan Policy EG3.

Transport

The existing lawful use of the site is Class B8, which is typically one of the more intensive employment uses in terms of servicing activity, HGV movements, and operational traffic generation. As no

additional floorspace or alterations to the site layout are proposed, the existing transport baseline would remain largely unchanged.

The proposed flexible change of use to Classes E(g)(ii), E(g)(iii), B2, and B8 is not anticipated to generate materially greater vehicle movements than the existing lawful B8 use. The submitted Noise Impact Assessment also confirms that operational vehicle movements, including HGVs and forklifts, would result in a low impact at nearby receptors within the context of the established industrial estate.

Parking demand associated with the proposed uses would remain capable of being accommodated within the existing site. While Class E(g)(ii-iii) uses can generate a higher parking requirement than B8 uses, the sustainable location including access to sustainable and active modes of travel, combined with the site's existing servicing arrangements and established employment use, means that no unacceptable parking or highway impacts are anticipated.

The site occupies a sustainable location in accordance with national planning policy. It benefits from direct access to the wider highway network via Imberhorne Lane and is located within accessible proximity to East Grinstead railway station and local bus services, providing opportunities for travel by sustainable transport modes. The proposal would therefore support the continued viable use of the site for employment purposes without resulting in unacceptable impacts on the local or strategic highway network.

Conclusion

The proposed flexible employment change of use at Unit 16 is fully supported by the development plan and will positively contribute to the vitality and viability of the Birches Industrial Estate Existing Employment Area. By retaining the full quantum of employment floorspace and introducing flexibility for Class E(g)(ii), E(g)(iii), B2, and B8 uses, the proposal accords with District Plan Policy DP1 and Neighbourhood Plan Policies EG10 and SS4.

The proposal will secure the long-term economic use of the site, attract a wider range of occupiers, and ensure the unit remains adaptable to changing employment needs. Given the established industrial context, the proposed uses would not give rise to unacceptable amenity impacts and are unlikely to exceed those associated with the existing lawful B8 use. The submitted Noise Impact Assessment concludes that the proposed development would result in a low impact at the nearest noise-sensitive receptors, with predicted noise levels remaining below representative background sound levels.

No increase in floorspace is proposed and the flexible change of use is not anticipated to result in materially greater trip generation than the existing lawful use. The site also occupies a sustainable location with good access to public transport and the wider highway network. The proposal can therefore be accommodated without harm to the amenity of neighbouring occupiers or the operation of the local or strategic transport network.

Overall, the proposal represents a policy-compliant form of employment development and planning permission should therefore be granted.

We trust that you have everything that you require to properly assess and determine the application accordingly, but please do not hesitate to contact Matthew.oconnor1@jll.com (07752 467007) or James.Sheppard@jll.com (07827 937992) should you require any further information.

Yours sincerely,

Jones Lang LaSalle Ltd

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