

PLANNING STATEMENT

IN RELATION TO:

‘Retrospective Planning Application for change of use from Use Class B2 (general industrial) to Use Class B8 (storage and distribution).’

**21 Victoria Gardens, Burgess Hill,
West Sussex, RH15 9NB**

December 2025

1.0 INTRODUCTION

- 1.1 On behalf of our Client, Tates Property Limited, this Retrospective Planning Application is submitted to the Local Authority seeking planning permission for change of use from Use Class B2 (general industrial) to Use Class B8 (storage and distribution).
- 1.2 This Planning Statement is submitted in support of the above detailed planning application. The statement describes the site, its surroundings and the proposal itself. The Planning Policy background is considered along with an assessment of the proposal considering the relevant policy and all other material planning considerations.
- 1.3 This application is accompanied by a package of application drawings, which have been prepared by Folkes Architects and a Transport Statement, which has been prepared by Motion.

2.0 SITE CIRCUMSTANCES

- 2.1 The application site comprises a parcel of land, located to the northern side of Victoria Gardens. The site area is 1968.6m².
- 2.2 There is a large shallow pitched building on site, with an existing flat roofed front projection, which is the subject of this retrospective planning application for change of use. It was previously used for light industrial (B1) with office accommodation and was changed to storage (B8) in 1994 under planning application **ref: BH/232/94**. Permission was subsequently approved to change the use of the building from B8 back to B2 in December 2018 (**ref: DM/18/37814**).
- 2.3 There is a currently a separate retrospective application being considered by MSDC in relation to the site (application reference currently awaited), for the permanent siting of 3 No. storage containers on the site.
- 2.4 To the eastern side of the building, is an existing area of hardstanding and parking area for the property.
- 2.5 The site is occupied by EBISS, which is a logistics company specialising in international shipping for events and exhibitions.
- 2.6 Victoria Gardens is part of an industrial estate characterised by commercial properties of varying designs, forms and scales and used as offices, light and general industrial uses, and storage (B1, B2 and B8).



Fig 1. Aerial photograph detailing the sites and its immediate surroundings
(courtesy of Google Maps – red line is indicative only)

- 2.7 To the rear of the site are the dwellings of Victoria Close, which back onto the application property and the other industrial units located on the northern side of Victoria Gardens.

3.0 PLANNING DESIGNATIONS

- 3.1 It is defined by the Mid Sussex Local Plan Proposals Maps that the site lies within the defined Built-up Area Boundary.
- 3.2 The site is within the Existing Employment Sites allocation (SA34), as defined by purple diagonal hatching. To our knowledge no other constraints or restrictions relate to the site.



Fig 2. Extract of the Mid Sussex Local Plan Proposals Map: Inset 7: Burgess Hill

4.0 THE PROPOSAL

- 4.1 This proposal seeks retrospective planning permission for change of use from Use Class B2 (general industrial) to Use Class B8 (storage and distribution). The use commenced on 15th August 2025. No external alterations or extensions are proposed as part of the development proposals.



Fig 3. Proposed Site Layout Plan

- 4.2 The use is operated by EBISS, a logistics company specialising in international shipping for events and exhibitions. They take their clients exhibition stands, models and materials to world-wide events, handle installation and return. They store their clients' assets between events.
- 4.3 The proposed use would have 23 No. employees.

- 4.4 Business opening hours are 08:30-17.00 hours, however due to the nature of the business the transport department can operate 24/7 during peak periods; March-June, Sept-early November.
- 4.5 There are 6 No. deliveries per day, carried out by multi-drop drivers. There are also occasional larger vehicles, as well as a small number of business visitors/ cold callers.
- 4.6 The existing car park provides 16 bays, and the proposals result in a slight reduction to 14 spaces. There is ample space for secure cycle parking on site, as shown on the submitted plans.

5.0 PLANNING POLICY

(i) National Planning Policy Framework (NPPF)

- 5.1 The National Planning Policy Framework (NPPF) was originally published on 27th March 2012, and has been updated on a number of occasions, most recently on 12th December 2024. This publication sets out the government's planning policies for England and how these are expected to be applied.
- 5.2 The NPPF confirms that planning law, as set out at Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 5.3 The focus of the revised NPPF continues to be achieving sustainable development. The NPPF clarifies that *"at a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs"* (taken from Resolution 42/187 of the United Nations). However, at paragraph 8 the Framework sets out that in planning terms, and in order to achieve sustainable development there are *"three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)"*. These objectives are economic, social and environmental, which *"should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area"* (paragraph 9).

- 5.4 The economic objective aims to *“help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”*. The social objective is *“to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being”* (paragraph 8).
- 5.5 Paragraph 11 is an important element of the NPPF. It states that: *“Plans and decisions should apply a presumption in favour of sustainable development... For decision-taking this means:*
- c) approving development proposals that accord with an up-to-date development plan without delay; or*
 - d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination”*.
- 5.6 Paragraph 12 confirms that *“the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date*

development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed”.

- 5.7 Paragraph 14 is relevant in this case. It states *“in situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply: a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement ...”.*
- 5.8 Section 4 of the Plan refers to Decision-making. At paragraph 39 of the Framework, it sets out that *“local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible”.*
- 5.9 The Framework also sets out that there are only limited circumstances where decision-makers should give weight to policies in emerging plans, and generally *“arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances”* (paragraphs 50 and 51 refer).
- 5.10 Section 6 refers to Building a strong, competitive economy. Paragraph 88 states that *“planning policies and decisions should enable:*

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

b) the development and diversification of agricultural and other land-based rural businesses;

c) sustainable rural tourism and leisure developments which respect the character of the countryside; and

d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship”.

5.11 Section 9 discusses sustainable transport, including the need to support opportunities, and give priority to walking, cycling and public transport, in addition to creating places that are safe, accessible, address the needs of people with disabilities, and are designed to enable charging of plug-in and other ultra-low emission vehicles.

5.12 Paragraph 113 sets out that *“Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport.”*

5.13 Paragraph 114 confirms that the main considerations in transport terms when determining specific planning applications is that proposals should provide:

“a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach”.

5.14 At paragraph 116 the Framework also confirms 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, following mitigation, would be severe...”*.

(ii) The District Plan 2014 - 2031

5.15 The District Plan was adopted March 2018 and forms part of the Development Plan against which this application will be assessed and determined. However, the Plan is now in excess of 5 years old. Paragraph 33 of the NPPF states *“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future”*.

5.16 It is understood that MSDC are in the process of preparing a new District Plan, which has been submitted for examination. The examining inspector has raised serious concerns, but following further submissions from the District Council the inspector is understood to be considering reopening examination in 2026. Due to the ongoing

uncertainty with the plan and a number of unresolved objections, we do not consider that any weight can be given to the emerging plan at this time.

5.17 The **District Plan** continues to be the most relevant local planning policy document at this time.

5.18 The Council's Policies Map (see **Fig 2**) identifies the site as being within the defined Built-up Area Boundary. The site also lies within an Existing Employment Sites.

5.19 **Policy DP1** refers to Sustainable Economic Development and states that "*Effective use of employment land and premises will be made by:*

- *Protecting allocated and existing employment land and premises (including tourism) unless it can be demonstrated that there is no reasonable prospect of its use or continued use for employment or it can be demonstrated that the loss of employment provision is outweighed by the benefits or relative need for the proposed alternative use;*
- *Permitting appropriate intensification, conversion, redevelopment and/ or extension for employment uses providing it is in accordance with other policies in the Plan;*
- *Giving priority to the re-use or adaptation of rural buildings for business or tourism use and to the diversification of activities on existing farm units (in accordance with Development in the Countryside policies)".*

5.20 The following policies are also considered of relevance: -

- **Policy DP21:** Transport Policy;
- **Policy DP26:** Character and Design;
- **Policy DP29:** Noise, Air and Light Pollution.

(iii) Neighbourhood Plans

5.21 The Burgess Hill Neighbourhood Plan (NP) has been ‘made’. In terms of policies, the majority are of a general nature and not relevant to this proposal. The following is of relevance: -

- **Policy S4:** Parking Standards for new developments.

(iv) Site Allocations DPD

5.22 The site is identified on the Councils Proposals map as being within an Existing Employment Sites (SA34). This policy is set out below: -

“Existing Employment Sites – Protection, Intensification and Redevelopment

Existing Employment Sites, classified as those in use classes E(g): Business, B2: General Industrial or B8: Storage or Distribution (as shown in Appendix A and on the policies map) are protected; proposals that would involve their loss will be resisted. Proposals on Existing Employment Sites that would involve the loss of employment land or premises will only be supported where it can be clearly demonstrated by the applicant that the site/premises are no longer needed and/or viable for employment use.

Development proposals outside the traditional employment use classes for non-employment generating uses will be supported on existing and allocated employment sites, if it is demonstrated that the continued use of the site, or its development for employment or employment uses, is not viable, through the provision of:

- (i) Details of comprehensive marketing of the site for at least 12 months and appropriate to the prevailing marketing conditions; and*
- (ii) A financial appraisal that demonstrates that the development of any employment generating use is unviable.*

Development proposals outside the traditional employment use classes for non-employment generating uses will be supported on existing and allocated employment sites, if it is demonstrated that the continued use of the site, or its development for employment or employment uses causes, or would lead to site-specific, environmental problems, such as noise, pollution or disturbance through traffic generation, recognising the environmental benefits to be gained by redeveloping these sites for non-employment generating uses.

Proposals for intensification within the boundary of Existing Employment Sites will be supported providing it is in accordance with other development plan and national policies.

Redevelopment for employment use within the boundary of Existing Employment Sites (as shown in Appendix A and on the Policies Map) will be supported where it does not result in the overall loss of employment floorspace. 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.

Existing Employment Areas – Expansion

Within the built-up area, expansion of Existing Employment Sites and premises for E(g)/B2/B8 uses will be supported where the business requirements cannot be met within the existing site/ premises through acceptable on-site expansion or intensification; and that relocation to existing stock is not preferable.

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”.*

Mid Sussex Design Guide Supplementary Planning Document (SPD)

- 5.23 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.

6.0 PLANNING HISTORY

(i) Application Site

6.1 According to the Council's online planning records, 21 Victoria Gardens, Burgess Hill has the following planning history: -

- **Planning ref: DM/23/0680/:** Change of use from B2 to Sui Generis Funeral Directors Facility (to include 24-hour access). Withdrawn 8th August 2023.
- **Planning ref: DM/18/3781/:** Retrospective application to change the building user from B8 to B2. Approved 21st December 2018.
- **Planning ref: BH/232/94/:** Change of use to B8 for storage and warehousing. Approved 22nd December 1994.
- **Planning ref: BH/023/91/:** First floor office extension to existing factory premises. Approved 5th April 1991.
- **Planning ref: BH/134/79/:** Light industrial building with office accommodation and off street parking. Granted.
- **Planning ref: BH/216/78/:** Light industrial building with office accommodation and off street parking. Granted.

7. PLANNING ASSESSMENT

a. Principle of Development

- 7.1 This proposal is seeking retrospective planning permission for change of use from Use Class B2 (general industrial) to Use Class B8 (storage and distribution). The site is located within the defined built-up area boundary where the principle of new development is accepted, subject to other policies in the plan. It is also identified as being within an allocated Employment Site (SA34), where *“Existing Employment Sites, classified as those in use classes E(g): Business, B2: General Industrial or B8: Storage or Distribution (as shown in Appendix A and on the policies map) are protected; proposals that would involve their loss will be resisted”*.
- 7.2 Paragraph 85 of the NPPF states that *“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential”*.
- 7.3 At the local level, **Policy DP1** of the District Plan relates. This policy states that *“effective use of employment land and premises will be made by:*
- Protecting allocated and existing employment land and premises (including tourism) unless it can be demonstrated that there is no reasonable prospect of its use or continued use for employment or it can be demonstrated that the loss of employment provision is outweighed by the benefits or relative need for the proposed alternative use;*

· *Permitting appropriate intensification, conversion, redevelopment and/ or extension for employment uses providing it is in accordance with other policies in the Plan...*”.

- 7.4 It is our opinion that this retrospective planning proposal is in full compliance with both national and local level guidance, which recognise the need for Councils to support economic growth and productivity and are supportive of the retention of proposals for B2 or B8 uses within the boundary of Existing Employment Sites.

b. Character

- 7.5 The proposal is for change of use only, with no external alterations or extensions proposed as part of the development proposal.
- 7.6 The application property is located within a commercial locality with a number of neighbouring properties in a light or general industrial use.
- 7.7 The application building comprises a large shallow pitched building, with an existing flat roofed front projection, which was previously used for light industrial (B1) with office accommodation and was changed to storage (B8) in 1994 under planning application **ref: BH/232/94**. Permission was subsequently approved to change the use of the building from B8 back to B2 in December 2018 (**ref: DM/18/37814/**). As such, the proposal is merely seeking to return the building to its former B8 use.
- 7.8 It is therefore considered that the proposed use within this locality is acceptable and would not have a negative impact on the character of the area. The proposal would be compliant with guidance contained within the NPPF, **Policy DP26** of the District Plan and the allocated Employment Site.

c. Transport

- 7.9 The application is supported by a Transport Statement, which has been prepared by Motion. The report confirms that *“the application proposals comprise change of use*

of the existing unit (totalling circa 900 square metres) from B2 (general industrial) to use within Land Use Class B8 (storage and distribution). The existing access and parking arrangements are to be retained”.

- 7.10 It states that *“the application is a retrospective planning application, as since mid-August 2025, Ebiss has occupied the building for use within Class B8. Ebiss is a logistics company specialising in international shipping for events and exhibitions. It is understood there are 23 staff employed at the site, with circa 20 staff on site at any time. The business is operational 08:30 to 17:00 hours Monday to Friday. However, due to the nature of the business there is some weekend working during peak periods for the business (March to June and September to November). It should be noted that whilst Ebiss currently occupies the unit, the planning application relates to a general change of use from B2 to B8 and is not specific to the company/business”.*
- 7.11 With regard to access arrangements, the statement states that *“access to the site is to be achieved via the existing access taken from Victoria Gardens. The existing vehicle crossover serving the industrial unit measures approximately 10 metres in width and currently accommodates the movement of vehicles associated with general industrial use, including delivery vehicles and rigid heavy goods vehicles (HGVs)...The existing Victoria Gardens priority junction with Albert Drive, located approximately 150 metres west of the site is measures approximately 28 metres at the bellmouth and benefits from suitable kerb radii and carriageway width to accommodate use by HGVs and light goods vehicles (LGVs)...Victoria Gardens and Albert Drive are subject to a speed limit of 30 mph...Guidance contained within Manual for Streets (2007) requires visibility splays of 43 metres in each direction set back 2.4 metres from the edge of the carriageway, where observed vehicle speeds are 30 mph...These visibility splays are shown on the drawings included in **Appendix C**, demonstrating that adequate visibility can be achieved from the both the existing site access onto Victoria Gardens, and at the existing priority junction to the west onto the wider business park. The drawings included in **Appendix C** also*

demonstrate that the required visibility splays are achievable within land forming the site and public highway”.

7.12 With regard to parking, *“the existing car parking area off Victoria Gardens will be retained and the indicative site layout plan included in **Appendix B** indicates a total of 14 car parking bays to serve the proposed change of use. Based on parking standards (introduced in Section 2) for the change of use, provision should be made for 9 car parking bays. It is noted that the WSCC guidance “should only be used as an initial guide for developers”. A site specific assessment should be completed to balance operational needs, space requirements, for example, in providing car parking. As noted previously, the existing car park provides 16 bays, and the proposals result in a slight reduction to 14 spaces...Having regard to the level of on street parking currently taking place within the wider business park, it is considered the proposed car parking provision is appropriate, and takes accounts of operational needs of the business...In respect of cycle parking, based on WSCC guidance, provision should be made for two spaces for staff and one space for visitors. Cycle parking can be secured by suitably worded planning condition. Locker facilities are also available within the existing unit...It is envisaged that provision for charging electric vehicles could be secured by planning condition, or through relevant building regulations, as appropriate...The existing area for loading/unloading to the north-east of the building is to be retained, which is considered to be adequate to accommodate the operational needs of the proposed B8 use...The proposed parking provision is therefore considered to accord with local standards introduced in Section 2 of this Transport Statement”.*

7.13 The Transport Statement draws the following conclusions: -

“In summary, this Transport Statement, which has been prepared having regard to relevant guidance, demonstrates that:

- The proposals accord with national and local policies relevant to transport;*
- The site is accessible by public transport, walking and cycling;*

- *A review of personal injury accident information has identified no significant issues associated with the local highway network that are detrimental to the existing standard of road safety;*
- *The existing site access from Victoria Gardens will be retained to serve on site parking and servicing area;*
- *Car parking is provided having regard to relevant local guidance and provision for cycle parking and electric vehicle charging can be secured by planning condition;*
- *Appropriate provision is made for servicing and deliveries; and*
- *The proposed change of use will not result in a material change in vehicle movements during weekday peak hours compared to the existing site operation, or across a typical weekday*
- *On this basis, it is considered that more detailed assessment is not necessary and that the proposal will not interfere with the operation of the adjoining highway network.*
- *As such, it is considered there is no reason why the proposals should be resisted on traffic or transportation grounds”.*

7.14 Our client is happy for secure cycle parking and electric vehicle charging to be secured by condition, if the Council considers this necessary. It is concluded that that the proposal (retrospective) will not give rise to an unacceptable impact on highway safety, therefore, the proposals would be compliant with guidance contained within the National Planning Policy Framework (NPPF) and **Policy DP21** of the District Plan.

d. Residential Amenity

7.15 Victoria Gardens is part of an industrial estate characterised by commercial properties of varying designs, forms and scales and used as offices, light and general

industrial uses, and storage (B1, B2 and B8). The building in question has historically been used for both B8 and B2 uses (refer to planning history section).

7.16 To the rear of the site are the dwellings of Victoria Close, which back onto the application property and the other industrial units located on the northern side of Victoria Gardens.

7.17 **Policy DP29** relates to Noise, Air and Light pollution, and states: *“The environment, including nationally designated environmental sites, nationally protected landscapes, areas of nature conservation or geological interest, wildlife habitats, and the quality of people's life will be protected from unacceptable levels of noise, light and air pollution by only permitting development where:*

Noise pollution:

- *It is designed, located and controlled to minimise the impact of noise on health and quality of life, neighbouring properties and the surrounding area;*
- *If it is likely to generate significant levels of noise it incorporates appropriate noise attenuation measures; Noise sensitive development, such as residential, will not be permitted in close proximity to existing or proposed development generating high levels of noise unless adequate sound insulation measures, as supported by a noise assessment are incorporated within the development.*

In appropriate circumstances, the applicant will be required to provide:

- *an assessment of the impact of noise generated by a proposed development; or*
- *an assessment of the effect of noise by an existing noise source upon a proposed development”.*

7.18 The use would be operated by EBISS, a logistics company specialising in international shipping for events and exhibitions. As previously outlined, the site has operation hours between 08.30 – 17.00 with a total of up to 23 employees on site. It should

be acknowledged that due to the nature of the business, the transport department can operate 24/7 during peak periods (March-June, September – early November).

- 7.19 We contend that a B2 use (general industrial) has the potential to have a greater impact on residential amenities than a B8 (storage and distribution) use. Indeed, at the time of planning **ref: DM/18/3781** being considered (retrospective application to change the building use from B8 to B2) the potential noise implications were considered in detail. The officer noted that *“it is therefore considered that with the suggested conditions, the noise generated by the change of use would be minimised and not have cause significant harm to the amenities of the neighbouring residential dwellings. It is however considered necessary to restrict the use of the unit to its current use (manufacturing of heating and ventilation systems) as other B2 uses may cause significant harm to the amenities of the neighbouring properties that back onto the northern side of the application property”*.
- 7.20 We would suggest that a return to a B8 storage use on site should be welcomed and would likely have a reduced impact upon the residential amenities of neighbouring properties.
- 7.21 It is accepted that the change of use could result in a change to the comings and goings to and from the site. The accompanying Transport Statement compared the estimated movements of the existing B2 and proposed B8 use, stating that *“the above table demonstrates that if the future use of the unit comprises a self – storage are housing facility, the proposed development would result in a net reduction in total vehicle movements during both the morning and evening peak hour periods, as well as over the course of an average weekday. Conversely, if the future use of the unit comprises either a commercial warehousing facility or a distribution centre, the development proposals would result in an imperceptible increase in vehicle movements during the course of an average weekday. It should be noted that the commercial warehousing scenario would only result in a marginal increase in vehicle movements during an average weekday and vehicle movements during each of the*

morning and evening peak hour periods would remain unchanged. They concluded that “the expected trip generation of the previous and future potential uses of the site has been assessed with reference to the industry standard TRICS database. The analysis has demonstrated that the proposed change of use would not result in a material change in vehicle movements during weekday peak hours, or across a typical weekday...On this basis it is concluded that the proposed development will not result in a material effect on the operation of the highway network local to the site and no further assessment of trips associated with the proposed development is considered necessary”.

- 7.22 It is our opinion that the change of use would not cause significant harm to the amenities of the neighbouring residential dwellings, and the proposal would not have a greater impact on the amenities of neighbouring properties by way of noise or disturbance than that existing. Indeed, the transport statement has confirmed that *‘the proposed development will not result in a material effect on the operation of the highway network local to the site’*. The proposal would be compliant with guidance contained in the NPPF and **Policies DP26 and DP29** of the District Plan.

e. Biodiversity Net Gain (BNG)

- 7.23 The Application site comprises hardstanding areas and the main commercial premises. Due to the retrospective nature of this planning application, the proposals are exempt from BNG requirements, but in any case the application is merely for change of use with no change to habitat.

8. CONCLUSIONS

- 8.1 This development seeks planning permission for retrospective change of use of the existing unit (totalling circa 900 square metres) from B2 (general industrial) to use within Land Use Class B8 (storage and distribution). The existing access and parking arrangements are to be retained.
- 8.2 The application site is located within the defined Built-up Area Boundary and within the Existing Employment Sites allocation (SA34).
- 8.3 No external changes or significant extensions/alterations are proposed as part of this application.
- 8.4 This retrospective planning proposal is in full compliance with both national and local level policy, which recognise the need for Councils to support economic growth and productivity and are supportive of the retention of proposals for B2 or B8 uses within the boundary of Existing Employment Sites.
- 8.5 The application building comprises a large shallow pitched building, with an existing flat roofed front projection, which was previously used for light industrial (B1) with office accommodation and was changed to storage (B8) in 1994 under planning application ref: BH/232/94. Permission was subsequently approved to change the use of the building from B8 back to B2 in December 2018 (ref: DM/18/37814/). As such, the proposal is merely seeking to return the building to its previous B8 use. It is therefore considered that the proposed use within this locality is acceptable and would not have a negative impact on the character of the area.
- 8.6 The application is accompanied by a Transport Statement, which confirms that the proposal would be acceptable from a highway perspective; and will not give rise to an unacceptable impact on highway safety and therefore, the proposals would be

complaint with section 9 of the National Planning Policy Framework (NPPF) and **Policy DP21** of the District Plan.

- 8.7 It is our opinion that the change of use would not cause significant harm to the amenities of the neighbouring residential dwellings, and the proposal would not have a greater impact on the amenities of neighbouring properties by way of noise or disturbance than that existing. It would be compliant with guidance contained in the NPPF and **Policies DP26** and **DP29** of the District Plan.
- 8.8 The development proposals would make an efficient use of the site, by allowing a viable business to continue to operate on site.
- 8.9 As the proposal accords with the aims and objectives of national and local planning policy and guidance, the Application Site is suitable for the provision of a new dwelling, and we request that planning permission is granted for the proposed development.

December 2025