

Freshfield Lane Brickworks Freshfield Lane, Danehill, Haywards Heath, RH17 7HH

Installation of No10 carports fitting with solar panels and rainwater harvesting facilities located within existing carparks.

COMBINED PLANNING DESIGN AND ACCESS STATEMENT
May 2025



REPORT CONTROL

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/1 INTRODUCTION

- 1.1. Energy Planning, by PWA Planning, is retained by NSI Projects ('the applicant') to submit a planning application for the development of the installation of No 10 carports fitting with solar panels and rainwater harvesting facilities located within existing carparks. ('the proposed development') at Freshfield Lane Brickworks, Freshfield Lane Brickworks, Freshfield Lane, Danehill, Haywards Heath, RH17 7HH, 'the application site'.
- 1.2. This planning application is submitted to West Sussex County Council ('the local planning authority', LPA) as a full planning application and relates to the red edge application site boundary defined on the Location Plan submitted in support of this application.
- 1.3. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. This Planning Statement will demonstrate that the proposals accord with the provisions of the relevant policies of the Development Plan, and moreover that there are other significant material considerations which indicate that planning permission ought to be granted. In addition, the statement will seek to demonstrate that there are no technical reasons that could hinder the grant of planning permission.
- 1.4. This Planning Statement, alongside a review of the site history and relevant policies, provides a description of the proposed development together with an appraisal of the planning merits of the scheme.
- 1.5. This statement should be read in conjunction with the application package set out within the List of Supporting Documents document submitted.
- 1.6. We feel it important to note that an application for the proposed development was submitted to and validated by Mid Sussex District Council on Thursday, 15 May 2025.
- 1.7. Following validation, and at the request of West Sussex County Council, it was advised that the application should instead be submitted to the County Council for determination.



- 1.8. In the interests of expediency, and to enable our client to progress the project without further delay, we have therefore taken the pragmatic decision to submit the application to West Sussex County Council.
- 1.9. As this re-submission has already introduced some delay to the project timeline, we would be very grateful if the application could now be processed and determined as swiftly as possible to support our client's programme for delivery.

/2 SITE DESCRIPTION

- 2.1. The application site comprises internal access roads and two distinct car parking areas within the operational boundary of Freshfield Lane Brickworks, located to the west of Freshfield Lane, Mid Sussex. The wider brickworks site consists of a mix of hardstanding areas, industrial and utility buildings, including production areas and associated infrastructure.



Figure 1: Application Site shown in Red

- 2.2. For the purposes of the proposed development, the site is divided into two principal areas.
- 2.3. The south-western (SW) car park is surfaced in tarmac (according to standard surfacing details, although this should be confirmed on site). It is bounded by mature trees along the northern, eastern, and western perimeters. A masonry wall defines the north-western boundary, beyond which lies a storage yard. To the south-west, beyond a belt of trees, is a substation. The main operational area of the brickworks is situated to the north of this car park.
- 2.4. The north-eastern (NE) car park is also surfaced in tarmac (to be verified) and is located nearer to the site's eastern boundary. It is bounded by security fencing along the eastern edge and is situated close to residential properties fronting Freshfield Lane, with some



limited vegetation providing partial visual screening. Adjacent to the north-west is a single-storey industrial building, while to the north-east is an office building with the appearance of a dwelling, located close to the brickworks' main vehicular access from Freshfield Lane.

- 2.5. An internal access road connects the two parking areas and serves as the primary circulation route within this part of the site, separating the operational areas from a small cluster of residential dwellings located between the brickworks and Freshfield Lane.

Designations

- 2.6. The application site is located outside of a settlement boundary within the countryside. The site is an allocated employment site.
- 2.7. The site lies within the High Weald Area of Outstanding Natural Beauty (AONB).
- 2.8. It is adjacent to the Freshfield Lane Site of Special Scientific Interest (SSSI), which is designated for its nationally significant geological interest; however, the application area itself lies outside the SSSI boundary.
- 2.9. The site also falls within a Minerals Safeguarding Area, recognising its strategic role in clay extraction.
- 2.10. There are no Public Rights of Way (PROW) crossing the site itself, although a footpath is located approximately 50 metres to the south. The site is located outside any Flood Zones 2 or 3, and there are no Listed Buildings within the immediate setting of the application site.

Planning Application History

- 2.11. Freshfield Lane Brickworks has an extensive planning history and relevant previous planning applications within the wider brickworks are listed below.

DM/19/1183:- Proposed demolition of existing office buildings and erection of new office building, with associated landscaping, visitor parking and new landscaped paths. Approved: Wed 12 Jun 2019.

DM/18/1908:- Approved Siting of office and welfare accommodation for a temporary period of 3 years. Approved: Thu 26 Jul 2018.



DM/16/1721:- Proposed demolition of existing office buildings and erection of new office building, with associated landscaping, visitor parking and new landscaped paths. Approved Wed 29 Jun 2016.

13/04317/CMA Construction of additional Brick Clamp and Raw Material processing building. Approved: Thu 13 Mar 2014.

13/02941/CMA:-Construction of a two storey extension to the existing office building, with various internal alterations: Approved: Wed 09 Oct 2013.

13/02626/CMA:-Variation of Condition - Permanent retention of office building. Approved: Fri 04 Oct 2013.

10/02061/CMA:-Temporary siting of portacabin for period of three years. Approved: Mon 27 Sep 2010.

09/03703/CMA:-Full planning permission for permanent retention of brick cutting building (originally permitted on a temporary basis for three years - permission CD/359/07 expiring 30 April 2010 refers. Approved: Thu 25 Feb 2010

09/00370/CMA:- Retention of existing industrial building to provide garaging for large earth moving machines used in connection with the brick making operations at the works. Approved: Tue 31 Mar 2009.

08/00908/CMA:- Extension to brick production buildings to house modernised plant, new raw material processing building and construction of additional dryer tunnels. Approved: Wed 16 Jul 2008.

08/00006/CMAES:- Extension of the lower pit into approximately 4.3ha of land, extraction of clay and restoration using indigenous mineral waste to forestry and conservation. Approved: Mon 08 Dec 2008.

07/02974/CMA:- Delete condition no. 5 from notice of permission CD/07/00359/CMA dated 11th May 2007 (external painting) Approved: Wed 12 Dec 2007.

07/00359/CMA:- Retention of brick cutting building for a temporary period of three years. Approved: Thu 05 Apr 2007.

HK/011/97:- Retrospective application for the erection of a new clamp shed. Approved Wed 09 Apr 1997.



HK/003/97:- New brick drying shed, extension to brick storage shed and re-building existing storage shed. Approved: Mon 10 Mar 1997.

HK/001/97:- Creation of additional area of hardstanding for storage of bricks and formation of additional earth banking, planting and retaining wall. Approved: Fri 07 Feb 1997

HK/035/95:- Extension to existing offices. Approved: Tue 05 Sep 1995.

HK/009/95:- County matter: new clamp shed. Approved: Wed 10 May 1995.

HK/010/95:- Extension to existing workshop. Approved: Wed 10 May 1995.

HK/025/94:- COUNTY MATTER - Determination of operating conditions to which interim development order permission registered as HK/008/92 Shall Be Subject. Approved: Mon 08 Aug 1994.

HK/014/94:- COUNTY MATTER: 1 new clamp shed, extension to existing brick making shed and extension to tunnel dryer. Approved: Tue 24 May 1994.



/3 DESCRIPTION OF THE PROPOSED DEVELOPMENT

- 3.1. The proposal seeks full planning permission for the installation of ten carport structures incorporating integrated solar panels across two existing parking areas within the Freshfield Lane Brickworks site. The development forms part of the applicant's wider commitment to improving on-site sustainability and reducing reliance on grid-supplied electricity.
- 3.2. The carports will be distributed between the two established car parks: six structures will be located within the larger South-West (SW) car park, and four within the North-East (NE) car park. Each structure will be positioned over existing vehicle parking bays and will provide shelter for staff and operational vehicles.
- 3.3. The primary objective of the proposal is to enable the Brickworks to generate its own renewable energy through solar power, helping to offset the site's operational energy consumption and reduce its carbon footprint. While their function is primarily energy-generating, the carports will also offer practical benefits by providing covered parking for site users.
- 3.4. The car ports will have mono pitched roofs and be 4.1m tall to the ridge and 2.9m tall to the eaves.

Sustainable Benefits

- 3.5. The carports will be fitted with 477 solar panels, providing a total installed capacity of 286.2 kWp. The system is projected to generate approximately 263.1 MWh of electricity per annum, representing an estimated 11% of the site's current electricity usage.
- 3.6. Over the anticipated 25-year operational period, the installation is expected to deliver a carbon emission saving of approximately 1,444 tonnes of CO₂, contributing directly to the site's and wider climate change objectives.
- 3.7. Eight electric vehicle (EV) charging units will be installed as part of the scheme, supporting the transition to low carbon transport for site users.



- 3.8. LED lighting will be installed under the canopies to replace the existing high-level car park lighting, reducing energy consumption and providing improved, downward-directed lighting with reduced glare and light spill.
- 3.9. A rainwater harvesting system will be incorporated into the design, capturing run-off from the carport roofs and storing it for non-potable uses, including toilet flushing within the site canteen and for use in the site's road sweeper. This will reduce the site's potable water demand and support water efficiency objectives.

/4 PLANNING POLICY CONTEXT

- 4.1. The following section identifies the relevant planning policy framework at national and local levels that applies to the proposed development.

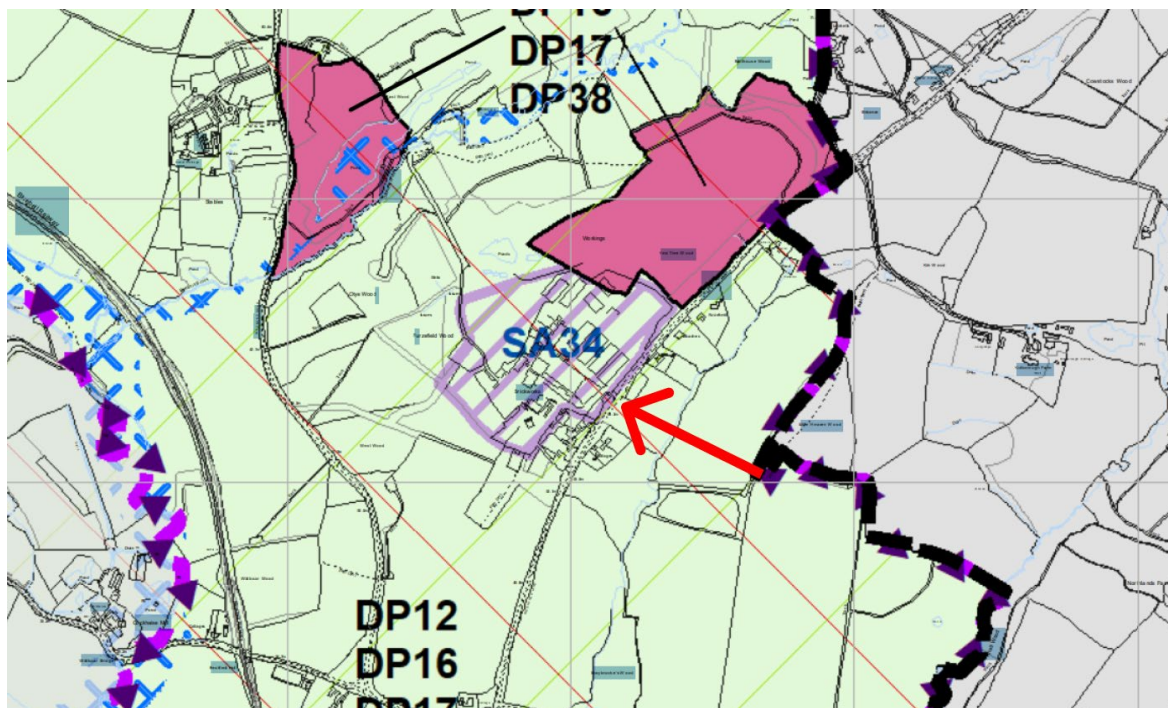


Figure 2 Extract from the councils Site Allocations and Designations Maps

- 4.2. The site lies within the High Weald Area of Outstanding Natural Beauty (AONB) and is adjacent to the Freshfield Lane Site of Special Scientific Interest (SSSI).
- 4.3. The key planning documents and relevant policies are listed below:

Emerging Mid Sussex District Plan

The emerging mid Sussex district plans is currently at regulation (stage) 18 of its production as such moderate weight should be given to its provisions within planning decisions.

Policy DP1 – Climate Change

Policy DPS3 – Renewable and Low Carbon Energy Schemes.

Policy DPC4 – High Weald Area of Outstanding Natural Beauty.

Mid Sussex Site Allocations Development Plan Document (2022)

Policy SA GEN – General Principles for Site Allocations.



West Sussex Joint Minerals Local Plan (WSJMLP)

July 2018 – Partial Review March 2021.

M12- Character

M18- Public Health and Amenity

M17- Biodiversity and Geodiversity

M23- Design and Operation of Mineral Developments

Mid Sussex District Plan (2014–2031)

Policy DP16 – High Weald Area of Outstanding Natural Beauty.

Policy DP29 – Noise, Air and Light Pollution.

Policy DP37 – Trees, Woodland and Hedgerows

Policy DP38 – Biodiversity.

Policy DP39 – Sustainable Design and Construction.

Policy DP40 – Renewable Energy Schemes

Policy DP41 – Flood Risk and Drainage.

Horsted Keynes Neighborhood Development Plan (HKNP)

Policy HK9: Conserving and Enhancing the High Weald AONB

Policy HK10: Protection and Improvement of Natural Habitats

Policy HK11: Climate Change - Sustainable Design and Renewable Energy

Policy HK12: Flood Risk and Drainage

Policy HK13: Light Pollution

Policy HK14: Expansion of Existing Commercial Premises

National Planning Policy Framework (NPPF, 2024)

Chapter 6. Building a strong, competitive economy

Chapter 12. Achieving well-designed places

Chapter 14. Meeting the challenge of climate change, flooding and coastal change

Chapter 15. Conserving and enhancing the natural environment

Chapter 16. Conserving and enhancing the historic environment

- 4.4. While not located in the Green Belt, it is relevant to note that NPPF Chapter 13. Protecting Green Belt land recognises that the wider environmental benefits associated with increased renewable energy generation may constitute very special circumstances in protected



landscapes. This reinforces the broader policy support for well-designed renewable energy schemes in sensitive locations where impacts are limited and well-managed.



/5 PLANNING POLICY ASSESSMENT

Principle of Development

- 5.1. With regard ancillary development on mineral sites WSJMLP Policy M23 states that: *"proposals for minerals development, including ancillary development, will be permitted provided that, where appropriate, the scale, form, layout (including landscaping), and operations take into account the need to:*
- (a) integrate with and, where possible, enhance adjoining land-uses and minimise potential conflicts between land-uses and activities;*
 - (b) have regard to the local context including:*
 - (ii) the characteristics of the site in terms of topography, and natural and man-made features;*
 - (iii) the topography, landscape, townscape, streetscape, and skyline of the surrounding area;*
 - (iv) views into and out of the site;*
 - (c) include measures to:*
 - (i) maximise water and energy efficiency;*
 - (ii) avoid or at least minimise greenhouse gas emissions;*
 - (iii) minimise the use of non-renewable energy, and maximise the use of lower-carbon energy generation (including heat recovery and the recovery of energy from gas); and*
 - (iv) ensure resilience and enable adaptation to a changing climate."*
- 5.2. MSDP Policy DP1 states that *"effective use of employment land and premises will be made by... permitting appropriate intensification, conversion, redevelopment and/or extension for employment uses providing it is in accordance with other policies in the Plan."* Freshfield Lane Brickworks is an established allocated employment site located within the countryside. Over the years, its increased production capacity and ability to provide local employment have been facilitated by an extensive list of planning approvals, as outlined above. As such, the principle of appropriate development that enhances the sustainability and efficiency of the site's operations has been firmly established.
- 5.3. MSDP Policy DP12 defines the countryside as *"the area outside of built-up area boundaries on the Policies Map."* The application site falls within this countryside designation. Policy DP12 supports development in such areas where it maintains, or where possible enhances, the quality of the rural and landscape character of the District, and where it is supported by



a specific policy reference elsewhere in the Plan, a Development Plan Document, or a relevant Neighbourhood Plan". As demonstrated in the Landscape and Area of Outstanding Natural Beauty (AONB) section below, the proposals will maintain the quality of the rural landscape. Furthermore, as a renewable energy scheme, the development is clearly supported by MSDP Policy DP40.

- 5.4. Policy DP40 states that *"proposals for new renewable and low carbon energy projects... will be permitted provided that any adverse local impacts can be made acceptable."* This includes particular reference to landscape and visual impacts, ecology and biodiversity, and residential amenity. In terms of potential adverse impacts, the proposals are considered to be acceptable with regard to all of these criteria. These matters are discussed in further detail in the relevant sections below, but in brief, the low-profile nature of the proposed carports, their siting within an established and previously developed part of the site, ensures that impacts are minimal and appropriately mitigated.
- 5.5. In light of the above, the proposed installation of solar panels on carport structures at the Freshfield Lane Brickworks site is considered to be acceptable in principle and in practice, fully in accordance with the aims and requirements of WSJMLP Policy M23, MSDP Policies DP1, DP12 and DP14, Emerging local plan policies DSP1 and DSP3 and Neighbourhood Plan Policy HK11.

Landscape and Area of Outstanding Natural Beauty

- 5.6. MSDP Policy DP40 States that *"proposals for new renewable and low carbon energy projects will be permitted provided that any adverse local impacts can be made acceptable, with particular regard to...[amongst other criteria]... Landscape and visual impacts, including cumulative impacts, such as on the setting of the ... High Weald Area of Outstanding Natural Beauty, in which the site is located."*
- 5.7. MSDP Policy DP16 states that *"Development within the High Weald Area of Outstanding Natural Beauty (AONB), as shown on the Policies Maps, will only be permitted where it conserves or enhances natural beauty and has regard to the High Weald AONB Management Plan, in particular;*
- *the identified landscape features or components of natural beauty and to their setting;*
 - *the traditional interaction of people with nature, and appropriate land management;*



- *character and local distinctiveness, settlement pattern, sense of place and setting of the AONB; and*
- *the conservation of wildlife and cultural heritage.*

Small scale proposals which support the economy and social well-being of the AONB that are compatible with the conservation and enhancement of natural beauty will be supported.

Development on land that contributes to the setting of the AONB will only be permitted where it does not detract from the visual qualities and essential characteristics of the AONB, and in particular should not adversely affect the views into and out of the AONB by virtue of its location or design."

- 5.8. WSJMLP Policy M12 states that *"Proposals for mineral development will be permitted provided that (a) they would not have an unacceptable impact on the character, distinctiveness, sense of place of the different areas of the County"*, before listing several landscape designations including High Weald Areas of Outstanding Natural Beauty.
- 5.9. The provision of this policy is echoed by Policy DPS3 and within the Emerging local plan and Policy HK9 within the Horsted Keynes Neighborhood Development Plan. As well as national policies regarding high value landscape designation.
- 5.10. From a more general design perspective MSDP Policy DP26 states that *"all development and surrounding spaces, ... will be well designed and reflect the distinctive character of the towns and villages while being sensitive to the countryside. All applicants will be required to demonstrate (amongst other criteria) that development:*
- *creates a sense of place while addressing the character and scale of the surrounding buildings and landscape;*
 - *does not cause significant harm to the amenities of existing nearby residents and future occupants of new dwellings, including taking account of the impact on privacy, outlook, daylight and sunlight, and noise, air and light pollution (see Policy DP29 discussed in the amenity section below)."*

Design

- 5.11. From a design perspective, the proposed carports are of a functional and utilitarian form, reflecting their primary role in supporting renewable energy generation. However, care has been taken to ensure the structures are as compact and efficient as possible, thereby



reducing their visual prominence within the site. The solar panels, positioned on the roofs of the carports, will be black in colour, which, while possessing a reflective finish, will appear recessive against the backdrop of the existing industrial setting.

- 5.12. The support structures will be constructed using galvanised steel, which initially will present a bright silver finish but will naturally weather over time to a more subdued, rustic matte grey, further reducing their visual impact.
- 5.13. Given the site's established industrial character and its location within the existing brickworks complex, the proposals are considered to respect the scale and appearance of the surrounding built environment and landscape context. The design will not cause significant harm to the amenity of nearby residents, nor will it introduce unacceptable impacts in terms of outlook, daylight, or noise, consistent with the objectives of Policy DP26.

Appearance within the setting of the wider area

- 5.14. Due to its built-up nature it is not considered that the brickworks site as a whole makes a significant contribution to the AONB. Whilst the land to the east of the Freshfield Lane Brickworks site forms part of the wider rural landscape and could be characterised as a relatively open pastoral setting, it is not considered to represent a landscape of exceptional quality or sensitivity. The fields lack notable landscape features such as historic hedgerows, field patterns, veteran trees, or distinctive topography typically associated with the special qualities of the High Weald AONB. Accordingly, there are no identified landscape components of natural beauty or key setting features within this immediate area that would be adversely affected by the proposals.
- 5.15. Notwithstanding this proposed carports on the southern car park will not be visible from any public vantage points due to the presence of established vegetation, trees, and built form, including existing dwellings that screen views. While elements of the carports in the northern car park may be partially visible above existing fencing and tree cover, these will be seen within the immediate context of the existing brickworks operations.
- 5.16. The proposals will not significantly affect the traditional interaction of people with nature or established patterns of land management. While there is a PROW located to the south of the southern car park the proposals will not be visible from route. There are no public footpaths along the stretch of Freshfield Lane adjacent to the brickworks, and the proposals



do not impinge upon areas commonly used for recreational access or traditional countryside pursuits.

- 5.17. As the proposed development is sited on existing areas of hardstanding, there will be no loss of greenfield land or habitat. Additionally, there are no cultural heritage assets in proximity that would be affected.
- 5.18. In line with the High Weald AONB Management Plan (2024–2029), the development avoids unnecessary encroachment into undeveloped countryside and reflects a low-impact intervention that supports a working landscape.
- 5.19. The small scale, energy-generating function of the carports aligns with the plan's objectives around climate action and sustainable land use, albeit this specific site lies within an already industrialised footprint.
- 5.20. The proposed development has been sensitively designed to minimise light pollution in accordance with the statutory purpose of conserving and enhancing the natural beauty of the High Weald Area of Outstanding Natural Beauty (AONB). In particular, the scheme includes the installation of LED lighting under the solar canopies, which will replace existing high-level floodlighting in the car park. This change will result in a significant reduction in light spillage and upward light emission, thus preserving the AONB's dark skies — a key characteristic of the area as identified in the High Weald AONB Management Plan 2024–2029.
- 5.21. As such, the proposals will conserve the existing character and sense of place and will not detract from the distinctiveness or setting of the AONB. The scheme integrates with the industrial landscape and maintains the visual integrity of the surrounding area.

Amenity

- 5.22. WSJMLP policy M18 states that "*proposals for mineral development will be permitted provided that: (a) lighting, noise, dust, odours, vibration, and other emissions, including those arising from traffic, are controlled to the extent that there will not be an unacceptable impact on public health and amenity...*"



- 5.23. MSDP Policy DP40 States that *"proposals for new renewable and low carbon energy projects will be permitted provided that any adverse local impacts can be made acceptable, with particular regard to...[amongst other criteria]...residential amenity including visual intrusion, air, dust, noise, odour, traffic generation, recreation and access."*
- 5.24. Neighborhood Plan Policy HK13 seeks to minimise light pollution, with external lighting only justified for operational, safety, or security reasons. Minimising light spill beyond the site and ensuring no harm to nearby residential properties.
- 5.25. Additionally, MSDP Policy DP29 seeks to protect residential properties and other sensitive uses from air, dust, noise, odour, and other forms of pollution.
- 5.26. The scheme replaces existing high-level lighting with lower-level, directional LED lighting under the proposed solar canopies. This will significantly reduce upward light spill and glare compared to the current situation, protecting the dark skies of the High Weald AONB and ensuring a reduction in obtrusive lighting towards nearby receptors, including residential properties. This supports the provisions of Neighborhood Plan Policy HK13.
- 5.27. Given the nature of the proposals, it is not considered that they will result in any significant levels of air, dust, noise, odour, or pollution. Furthermore, due to the scale and siting of the structure in question—situated outside of a 45-degree line and more than 14 metres from any window serving a habitable room—it is not considered that the development will result in any significant visual intrusion, loss of light, privacy, or overbearing impact on surrounding residential properties.

Tree Protection

- 5.28. WSJMLP Policy M17 states that *"proposals for minerals development will be permitted provided that (d) there is no loss or deterioration of irreplaceable habitats, including Ancient Woodland and aged or veteran trees, unless the benefits of the development clearly outweigh the loss."*
- 5.29. MSDP Policy 37 states that *"Development that will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/ or that have landscape, historic or wildlife importance, will not normally be permitted."*



- 5.30. In accordance with this policy the proposals have been carefully designed to avoid any adverse impact on existing trees, woodland or hedgerows. Given the minimal nature of the development and the fact that all works are confined to existing areas of hardstanding with no significant ground incursion, the proposals will not result in the loss or degradation of any trees that contribute to the visual amenity, character, or ecological value of the area and tree proposals and the proposals will not include any tree removal or works within canopy spread zones, the risk to tree health and structure is negligible. As such, the scheme is not considered to conflict with the objectives of M17 and DP37 and a full arboricultural assessment is not considered to be required.

Biodiversity

- 5.31. WSJMLP Policy M17 states that proposals for minerals development will be permitted provided that (a) significant harm to wildlife species and habitats; (b) there is no loss or deterioration of irreplaceable habitats, (e) where possible, there are net gains in biodiversity and (e) where necessary, the investigation, evaluation, and recording of important sites.
- 5.32. MSDP Policy DP40 States that *"proposals for new renewable and low carbon energy projects will be permitted provided that any adverse local impacts can be made acceptable, with particular regard to...[amongst other criteria]... Ecology and biodiversity, including protected species, and designated and non-designated wildlife sites".*
- 5.33. MSDP Policy DP38 states that "Biodiversity will be protected and enhanced by ensuring development:
- *Deliver a net gain in biodiversity, including through enhancements and new habitats.*
 - *Protect existing biodiversity, avoiding harm and mitigating unavoidable impacts.*
 - *Maintain and improve ecological connectivity, reducing fragmentation of habitats.*
 - *Support the restoration and expansion of priority habitats across the district.*
 - *Avoid harm to designated sites and features of ecological or geological importance, including local wildlife areas, ancient woodland, and biodiversity opportunity areas."*
- 5.34. These provisions are echoed by the similar policies in the emerging and neighborhood plans.
- 5.35. Due to the fact that the proposals will take place entirely on existing areas of hardstanding, there will be no loss of habitat or impact on existing biodiversity features.



- 5.36. In accordance with the Biodiversity Net Gain provisions set out under the Environment Act 2021 and associated regulations, the proposed development is considered exempt from the requirement to deliver BNG. This is on the basis that the works are confined entirely to existing areas of hardstanding and do not involve the removal or degradation of any habitats, including priority habitats, hedgerows, or other ecologically valuable features.
- 5.37. There will be no loss of biodiversity as a result of the development, and no impact on any designated sites. As such, the proposals meet the criteria for exemption, and a formal BNG metric or offsetting strategy is not required in this instance.

Other Matters

- 5.38. The proposals will not result in alterations to vehicle access or loss of parking space.
- 5.39. Freshfield Lane SSSI is located close to the application site given the minimal nature of the proposals, it is not considered that they will have any significant impact in the SSSI.

Sustainable Benefits / Planning Balance

- 5.40. The proposed development comprises the installation of ten solar carport structures within existing areas of hardstanding at Freshfield Lane Brickworks, an established industrial site located within the High Weald Area of Outstanding Natural Beauty (AONB). The proposals are supported by a comprehensive suite of national, local, and landscape-specific planning policies which collectively encourage well-sited renewable energy generation, particularly where this can be delivered with minimal environmental, landscape, and amenity impacts.
- 5.41. The proposal will deliver a series of clear sustainability benefits, listed below.
- 5.42. The generation of approximately 263.1 MWh of renewable electricity per annum, reducing the site's reliance on grid electricity and directly supporting the UK's transition to a low carbon economy.
- 5.43. An estimated saving of 1,444 tonnes of CO₂ emissions over the 25-year lifetime of the installation, contributing to both local and national climate change objectives.



- 5.44. The installation of eight EV charging units, facilitating the transition to lower carbon modes of transport and improving the site's infrastructure.
- 5.45. LED lighting improvements beneath the canopies, delivering operational efficiencies while reducing light spill and associated visual impacts.
- 5.46. The inclusion of a rainwater harvesting system, which will provide a sustainable source of non-potable water for use on site, thereby supporting water efficiency and resilience.
- 5.47. From a land use planning perspective, the proposals are firmly rooted within the operational footprint of an existing industrial site and make beneficial use of previously developed land. There will be no loss of greenfield land, no impact on biodiversity or habitats, and no degradation of important landscape features. The works are entirely confined to established hardstanding, avoiding any encroachment into the wider countryside or designated ecological sites, including the nearby Freshfield Lane SSSI.
- 5.48. In landscape and visual terms, the proposals have been sensitively sited and designed to ensure that any views of the structures are contained within the context of the existing industrial operations of the brickworks. Where views are possible, they will be seen against the backdrop of the site's wider built form, with no significant effects on the wider AONB landscape character or views from public vantage points. The proposals do not erode the identified components of natural beauty, nor do they disrupt traditional land management patterns, settlement form, or cultural heritage assets, in accordance with the expectations of the High Weald AONB Management Plan (2024–2029).
- 5.49. The modest scale of the proposal, its unobtrusive form, and its alignment with local and national sustainability priorities must be balanced against the site's location within a nationally designated landscape. In this regard, the NPPF is clear that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs; however, it also recognises that wider environmental benefits associated with renewable energy generation can be afforded significant material weight. This principle is reinforced by local policy (MSDP Policy DP40), which explicitly supports renewable energy schemes where impacts are or can be made acceptable.



- 5.50. In this case, the site-specific characteristics, including its established industrial use, built-up nature, and limited visibility within the wider landscape, ensure that the impacts are negligible and appropriately mitigated. Accordingly, there are no identified adverse impacts that would significantly or demonstrably outweigh the substantial environmental, operational, and climate change benefits of the proposals.
- 5.51. In conclusion, it is considered that the proposals represent a highly sustainable form of development that will deliver significant environmental and operational benefits with minimal environmental or landscape harm. The planning balance is therefore considered to be strongly tilted in favour of the proposed development, and in line with the presumption in favour of sustainable development set out in the NPPF and the Mid Sussex District Plan.



/6 CONCLUSION

- 6.1. This planning statement has demonstrated that the proposed installation of solar carport structures at Freshfield Lane Brickworks is a sustainable and appropriate development that accords with both national county level and local planning policy, including the West Sussex Joint Minerals Local Plan, Mid Sussex District Plan, the emerging Mid Sussex District Plan, the Site Allocations DPD, the National Planning Policy Framework (2021), and the objectives of the High Weald AONB Management Plan (2024–2029).
- 6.2. The proposal will deliver significant environmental benefits through on-site renewable energy generation, carbon emissions reduction, and water efficiency, while also enhancing the site's operational resilience and sustainability credentials. The scheme is sensitively designed, carefully sited within existing areas of hardstanding, and presents no unacceptable impacts upon the landscape character, visual amenity, ecology, biodiversity, or the special qualities of the High Weald AONB.
- 6.3. Any limited impacts associated with the development are demonstrably outweighed by the clear and substantial sustainability and climate benefits of the scheme. The planning balance, when assessed in the context of the development plan taken as a whole and the guidance of the NPPF, is firmly tilted in favour of the proposed development.
- 6.4. Accordingly, it is respectfully requested that planning permission is granted without delay.



/7 DESIGN AND ACCESS STATEMENT

Introduction

- 7.1. This Design and Access Statement has been prepared in support of the planning application for the installation of ten solar carport structures, together with associated infrastructure, at Freshfield Lane Brickworks.

Design

- 7.2. The proposed development comprises the erection of ten steel-framed carport structures incorporating integrated photovoltaic (PV) solar panels. The structures will be located across two existing areas of hardstanding within the operational brickworks site. The design is functional and utilitarian, reflecting the industrial character of the site, while also being of a simple and restrained appearance to minimise visual impact.
- 7.3. The carports will incorporate black solar panels, mounted on galvanised steel structures. The form of the canopies is intentionally low-profile and will sit comfortably within the existing built environment of the brickworks. The proposed structures have been designed to maximise energy generation while remaining visually recessive within their immediate and wider setting.

Access

- 7.4. Access to the site will remain unchanged. The proposed development does not involve any changes to existing vehicular or pedestrian access arrangements. The carports will be sited over existing parking bays, ensuring continued access for staff and operational vehicles. The proposals will not generate additional vehicle movements beyond those already associated with the site's operations.

Summary

- 7.5. The proposals represent a proportionate, sustainable, and well-integrated addition to the existing industrial site, delivering clear environmental and operational benefits while respecting the site's context within the High Weald AONB. The design and access arrangements are appropriate and fully compliant with relevant local and national planning policies.



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