

PLANNING STATEMENT

Land East of Heath Place
Ash Grove Industrial Estate,
Bersted
West Sussex,
PO22 9SL

“Change of use of land to open storage and parking,
raising of land levels (retrospective) and laying of
hardstanding, associated landscape works”

August 2026

Executive Summary

This Planning Statement supports a part retrospective planning application for the change of use of approximately 0.3223 hectares of land at the eastern edge of Ash Grove Industrial Estate to open storage and parking, the retention of raised land levels and hardstanding, together with associated landscape and floodplain restoration works.

The application has been deliberately formulated as a materially different and substantially reduced proposal from the previously refused application BE/112/25/OUT. That application sought three Class E light-industrial units. The current application proposes no buildings, no new employment floorspace and no enclosed or sleeping accommodation. The land would remain predominantly open, with 16 parking spaces principally serving employees of existing commercial premises immediately to the west and a defined area for open storage.

The principal issue arising from the previous application was flood risk, including the Environment Agency's concern regarding functional floodplain and historic land raising. The current application addresses that issue directly. It seeks retrospective permission for retention of the existing raised levels rather than avoiding the issue, proposes no further general raising, and incorporates a substantial floodplain restoration corridor along the northern and eastern margins.

The restoration corridor will extend for approximately 102 linear metres, be 3 metres wide and be lowered by approximately 600mm. It therefore covers approximately 306m² and creates approximately 183.6m³ of additional potential flood-storage volume compared with the existing physical condition. The corridor will remain free of parking, storage and buildings and will be landscaped with native planting.

The accompanying Flood Risk Assessment assesses both the contemporary site condition and the implications of historic land raising. It concludes that the proposed open use, absence of buildings, targeted restoration of flood-storage capacity, flood-warning arrangements and management controls provide a materially lower-consequence form of development than the three industrial units previously proposed.

The ecological value of the operational part of the land is limited. It is dominated by hardstanding and disturbed/unvegetated ground, with the more valuable vegetation concentrated towards the margins and watercourse corridor. The proposal introduces native hedging, two native trees and the 306m² lowered landscaped corridor, thereby improving habitat structure at the site edge. Precautionary controls can be imposed over vegetation clearance, lighting and pollution prevention.

The application is made retrospectively under section 73A of the Town and Country Planning Act 1990. Mandatory Biodiversity Net Gain does not apply to retrospective planning permissions made under section 73A. A statutory biodiversity metric and Biodiversity Gain Plan are therefore not required. This does not prevent the scheme from providing voluntary ecological enhancement through its landscape proposals.

For the reasons set out in this Statement, the proposal represents a proportionate use of a small parcel immediately adjoining an established industrial estate, supports the operation of existing businesses, regularises the existing use and landform, and secures tangible flood-risk and landscape betterment. Planning permission is therefore respectfully sought.

1. Introduction

This Planning Statement has been prepared in support of an application at Land East of Heath Place, Ash Grove Industrial Estate, Bersted, West Sussex PO22 9SL.

The application description is: “Change of use of land to open storage and parking, raising of land levels (retrospective) and laying of hardstanding, associated landscape works”.

The application relates only to the north-western part of the wider landholding and extends to approximately 0.3223 hectares.

The proposal comprises open storage, 16 parking spaces principally serving staff of the established commercial premises immediately to the west, retention of existing raised land levels and hardstanding, native boundary landscaping, two native trees and targeted floodplain restoration works.

No buildings are proposed. This is central to the assessment of the application. The proposal introduces no enclosed commercial floorspace, no residential or sleeping accommodation, and no substantial built obstruction to floodwater.

The application follows the refusal of BE/112/25/OUT for three Class E light-industrial units. It has been prepared specifically to respond to the flood-risk and environmental issues identified through that application and the earlier planning history.

2. Site and Surroundings

The site lies immediately east of the established Ash Grove Industrial Estate/Heath Place commercial area at Bersted. Its western edge has a direct physical and functional relationship with existing employment premises.

The site is already substantially characterised by hardstanding, disturbed ground, parking and storage-related activity. It is not an undisturbed greenfield parcel. The northern and eastern margins provide the transition towards the local floodplain and watercourse network.

The current proposal deliberately concentrates operational activity adjacent to the existing industrial estate and provides a softer landscaped and floodable edge to the north and east.

The parking element is intended principally to address an existing shortage of staff parking serving the adjoining commercial premises. It therefore has a site-specific operational relationship with existing employment uses rather than being a freestanding public car park.

The proposed open-storage use is similarly characteristic of the commercial context. The absence of buildings and the use of native boundary planting substantially reduce the visual and landscape consequences compared with built industrial development.

3. Proposed Development

The application seeks to regularise the existing change of use, hardstanding and raised levels, while introducing prospective landscape and floodplain-restoration measures.

The operational layout provides 16 parking spaces and an area of open storage. The parking would principally be used by staff of the existing businesses immediately west of the site.

Native hedging is proposed along the northern and eastern boundaries and two native trees are proposed within the central parking area.

A continuous floodplain restoration corridor is proposed along the northern and eastern margins. It will be approximately 102m long and 3m wide, giving an area of approximately 306m². Existing levels within this strip will be lowered by approximately 600mm.

The simple volumetric calculation is $102\text{m} \times 3\text{m} \times 0.60\text{m} = 183.6\text{m}^3$. The works therefore create approximately 184m³ of additional potential flood-storage volume relative to the existing physical condition.

The lowered corridor will be permanently excluded from parking, open storage and buildings and will form part of the landscape treatment of the site.

4. Planning History and Evolution of the Proposal

BE/138/23/OUT

BE/138/23/OUT sought outline permission for three light-industrial/workshop units. The Council's subsequent pre-application advice records that it was refused for reasons concerning flood risk, surface-water drainage and ecology.

Following that refusal a Sequential Assessment was undertaken. The Council's March 2025 pre-application advice recorded that 401 potential sites had been considered and that the Council had no objection to the submitted Sequential Assessment.

The same advice indicated that industrial development is a Less Vulnerable use and identified Flood Zone 3b as the key constraint requiring resolution.

BE/112/25/OUT

BE/112/25/OUT subsequently sought outline permission for three Class E light-industrial units and associated landscaping. Arun District Council refused that application on 24 December 2025.

During its determination the flood-risk evidence was amended to include SuDS and a separate response to the Environment Agency. The Environment Agency nevertheless maintained concern regarding the relationship with Flood Zone 3b/functional floodplain and the effect of historic land raising on floodplain storage.

Those concerns are not ignored by the present application. The scheme has instead been fundamentally recast so that the Council and Environment Agency can assess a low-intensity open use without permanent industrial buildings and with a quantified element of floodplain restoration.

4.3 Material Differences from the Refused Scheme

BE/112/25/OUT	Current Application
Three permanent Class E industrial buildings	No buildings
New industrial floorspace	No new floorspace
Larger development proposition	0.3223ha application parcel
Permanent built form within flood-risk area	Open storage and parking
Historic raising raised as an unresolved concern	Retrospective permission expressly sought for raised levels
No quantified restoration now relied upon	306m ² lowered corridor providing approx. 183.6m ³ additional storage
Greater roof/hard-surface drainage burden	No roof runoff; permeable/semi-permeable surfacing where practicable
Greater landscape mass and enclosure	Low-profile open use with native hedging and trees

5. Development Plan and Material Considerations

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

The statutory development plan includes the Arun Local Plan 2011-2031, adopted in July 2018, together with relevant made neighbourhood planning documents, including the Bersted Neighbourhood Plan.

Policies of particular relevance include the Local Plan's strategic sustainable-development policies, countryside and settlement policies, employment and enterprise policies, design and landscape policies, biodiversity policy ENV DM5, flood-risk policy W DM2 and sustainable-drainage policy W DM3.

The National Planning Policy Framework published on 17 August 2026 is an important material consideration. It replaces the December 2024 Framework and includes current national policy on economic growth, effective use of land, flood risk, biodiversity, design and sustainable development.

The Council's March 2026 Strategic Flood Risk Assessment is also a material evidence base. Site-specific evidence in the accompanying FRA remains necessary because the application concerns a small parcel with a particular history of level changes and a specific low-vulnerability use.

6. Principle of Development and Economic Role

The site is immediately adjacent to an established employment estate. The proposal is therefore not an isolated commercial incursion unrelated to existing development.

The 16 parking spaces respond to an existing operational requirement of the adjoining commercial premises. The spaces would principally accommodate staff who already work at those premises and therefore should not be equated with parking generated by a new 16-space destination.

Providing staff parking immediately adjoining the businesses can reduce informal parking pressure, improve circulation and preserve operational areas for servicing and commercial activity.

Open storage is also a use commonly associated with industrial and commercial estates. In physical terms it is materially less intensive than the three permanent industrial units previously proposed.

National policy gives substantial importance to creating conditions in which businesses can invest, adapt and operate effectively. The proposal supports existing employment activity without constructing additional buildings or introducing a materially urbanising form of development.

To the extent that the site lies outside a defined Built-Up Area Boundary, that spatial-policy consideration must be weighed against its immediate adjacency to established employment land, its disturbed character, the operational relationship of the parking, the absence of buildings, the landscape treatment and the environmental betterment secured by the restoration corridor.

7. Retrospective Nature of the Application

The application is made under section 73A of the Town and Country Planning Act 1990. It expressly seeks retrospective permission for the change of use, raising of land levels and laying of hardstanding already undertaken.

The planning merits of retaining those works must be assessed on their actual effects. The retrospective nature of an application is not itself a planning harm or a reason for refusal.

The applicant does not seek further general raising of the operational site. Instead, the proposed mitigation removes material from the northern and eastern margins and creates a defined area of additional flood-storage capacity.

This approach allows the Council to regularise the present condition while securing enforceable mitigation and landscaping that would not otherwise necessarily be delivered.

8. Flood Risk: Policy Context

Flood risk is the principal environmental issue. A detailed Flood Risk Assessment accompanies the application and should be read alongside this Statement.

Open storage and car parking fall within the Less Vulnerable vulnerability classification. Less Vulnerable development is compatible with Flood Zone 3a. National policy does not, however, identify Less Vulnerable development as compatible with confirmed Flood Zone 3b functional floodplain.

The application therefore does not rely upon an argument that Less Vulnerable development is acceptable in Flood Zone 3b as a matter of principle. The relevant site-specific question is the hydraulic character and function of this particular 0.3223ha parcel, assessed using the available model information, historic terrain information and the physical characteristics of the development.

The scheme also needs to demonstrate that it does not increase flood risk elsewhere. The absence of buildings, no further general raising and creation of approximately 183.6m³ of additional storage are central to that assessment.

9. Flood-Risk Baseline and Historic Raising

The FRA does not simply adopt the contemporary raised ground levels as an uncontested natural baseline. It acknowledges the history of level change and considers the implications of the historic condition.

The available topographic information records contemporary levels broadly in the range 1.43m to 1.84m AOD across the wider assessed land. Historic terrain information indicates lower levels in parts of the wider site.

The available hydraulic model indicates an approximate 1 in 30-year / 3.3% AEP flood level of 1.12m AOD. Historic terrain analysis indicates that potential flooding at that frequency was shallow and spatially variable rather than demonstrating that every part of the wider site performed an equivalent functional-floodplain role.

For the 1 in 100-year plus climate-change event, an indicative modelled level of approximately 1.51m AOD has been used in the storage assessment.

The FRA therefore takes a conservative and transparent approach: historic raising is acknowledged; historic and current levels are considered; and the proposal includes physical restoration rather than relying solely upon the present raised condition.

10. Historic Floodplain Storage and Hydraulic Significance

A volumetric assessment of the substantially larger historic land parcel indicates a theoretical loss of approximately 2,550m³ of flood-storage volume when assessed against the 1.51m AOD modelled flood level.

That figure must not be attributed wholesale to the current 0.3223ha application site. The earlier assessment area was materially larger and storage volume is determined by the elevation of individual parts of the land, not simply by multiplying a site-area ratio.

The hydraulic significance of the wider theoretical loss can nevertheless be tested. The relevant wider floodplain area between Roman Way and Shripney Road has been calculated at approximately 148,353m².

Dividing 2,550m³ by 148,353m² gives approximately 0.0172m, or about 17mm. This represents the theoretical uniform increase in flood level if the entire wider-site displaced volume were distributed across that receiving floodplain.

The calculation is necessarily simplified and is not advanced as a substitute for a full hydraulic model. It is, however, useful in demonstrating scale: even the theoretical loss attributed to the substantially larger parcel equates to a very small average depth across the relevant wider floodplain.

The planning issue is therefore not merely whether theoretical storage has historically changed, but whether retention of the present landform and the low-intensity use now proposed would result in a material or unacceptable increase in flood risk elsewhere.

11. Floodplain Restoration and Betterment

The application incorporates a substantive and measurable floodplain-restoration measure rather than relying solely upon the argument that the historic hydraulic effect is limited.

A continuous corridor approximately 102m in length and 3m in width will be formed along the northern and eastern margins. The area will be lowered by approximately 600mm relative to existing ground level.

The corridor therefore covers approximately 306m². At 0.60m lowering, it creates approximately 183.6m³ of additional potential floodwater-storage volume: $102\text{m} \times 3\text{m} \times 0.60\text{m} = 183.6\text{m}^3$.

The corridor will remain permanently free of parking, open storage and buildings. It will be landscaped with native vegetation and maintained as an open, hydraulically connected and floodable margin.

This is a real physical improvement relative to the existing condition. The application does not simply seek retention of raised levels; it combines regularisation of the operational part of the site with partial physical reversal of historic raising around the floodplain edge.

No unsupported claim is made that 183.6m³ constitutes precise level-for-level compensation for every cubic metre of historic theoretical storage loss across the wider landholding. The calculation nevertheless demonstrates a meaningful and enforceable increase in storage within the application boundary.

11.7 The approximately 184m³ of restored capacity should therefore carry material weight in the assessment of whether the retrospective retention of the land levels is acceptable.

12. Flood Conveyance and Historic Ditch

The historic presence of a ditch or relief feature within the wider land has previously been raised. The available Environment Agency hydraulic model does not represent the historic ditch as a discrete modelled cross-section, node or breakline.

Review of lower-order flood events indicates that modelled flows are principally conveyed through the established channel network. The available model evidence therefore does not establish that the historic ditch was an essential conveyance route upon which the hydraulic functioning of the wider system depends.

This conclusion is appropriately qualified because all hydraulic models simplify real-world conditions. Nevertheless, there is no positive model evidence demonstrating that the current proposal would obstruct an identified strategic flow path.

The proposed lowered northern/eastern corridor provides further reassurance by creating an open floodable margin rather than adding built obstruction.

13. Surface-Water Drainage

The current proposal has a materially lower drainage burden than the previously proposed industrial units because there are no roofs and therefore no roof-water runoff.

Permeable or semi-permeable surfacing should be retained or introduced where technically practicable, consistent with the principles of sustainable drainage.

The floodplain-restoration corridor is primarily proposed as compensatory/betterment flood storage and landscape habitat rather than being double-counted as the sole formal surface-water attenuation feature.

The open nature of the use and absence of new built footprint materially reduce the risk of rapid runoff compared with a conventional industrial-building scheme.

14. Flood Safety and Management

The proposed use is inherently lower consequence than occupied industrial buildings. There is no residential accommodation, no sleeping use and no requirement for people to remain on the site during a flood.

The operator should register for Environment Agency flood warnings. A responsible site manager should monitor warnings, cease use when necessary and arrange removal of vehicles and movable items where reasonably practicable before a forecast event.

Stored materials capable of floating or becoming entrained should be restrained, secured or removed. Hazardous or polluting materials should not be stored in a manner that creates a pollution risk during flooding.

The lowered restoration corridor must remain unobstructed and must not be used for storage or parking.

These measures can be secured through planning conditions and an operational flood-management plan.

15. Ecology and Biodiversity

The operational part of the application site has limited intrinsic ecological value. It is predominantly hardstanding, artificial unvegetated/unsealed disturbed ground and land already affected by parking and storage activity.

The more ecologically useful habitat is concentrated around the vegetated northern and eastern margins and the adjoining watercourse corridor. The proposal has therefore been designed to retain an open edge and introduce additional native planting rather than extending built form towards those margins.

The site contains no buildings and no mature woodland habitat. Its suitability for dormice is negligible. The hardstanding and disturbed operational areas are unsuitable for amphibians and reptiles, although marginal ruderal vegetation and stored materials can provide limited sheltering/foraging opportunities for common species.

No evidence indicates that the operational land is of significant importance to badgers. The watercourse corridor may be used by foraging or commuting bats and should therefore be protected from unnecessary light spill.

The adjoining ditch is of poor overall suitability for water vole and no evidence of direct water vole use has been identified. Nevertheless, because the ditch connects into the wider watercourse network, a precautionary approach to vegetation clearance and works close to the bank is appropriate.

The scheme provides native hedgerow planting along the northern and eastern boundaries, two native trees and approximately 306m² of lowered landscaped floodplain margin. These measures will strengthen habitat structure and ecological connectivity compared with the predominantly disturbed existing site.

Any vegetation clearance should, where practicable, occur outside the main bird-nesting season. If clearance is necessary during that period, a competent person should check affected vegetation before work proceeds. External lighting should be kept to the minimum necessary and directed away from the watercourse and vegetated margins.

Pollution-prevention measures should be applied to the storage use, including appropriate containment of potentially contaminating materials and spill-response arrangements.

16. Biodiversity Net Gain Exemption

The application is retrospective and is made under section 73A of the Town and Country Planning Act 1990. National Planning Practice Guidance confirms that mandatory Biodiversity Net Gain does not apply to retrospective planning permissions made under section 73A.

The statutory biodiversity gain condition in Schedule 7A of the 1990 Act is therefore not applicable to the permission sought. A statutory biodiversity metric and Biodiversity Gain Plan are not required for this application.

The application form should expressly identify the section 73A retrospective-permission exemption as the reason why the biodiversity gain condition does not apply.

The statutory exemption does not remove the ordinary planning requirement to consider biodiversity effects or relevant development-plan policy. Those matters are addressed through the limited ecological value of the operational land, avoidance of unnecessary impacts to the margins and the positive native landscaping described above.

17. Landscape and Visual Effects

The proposal introduces no buildings and therefore no new roofscape, industrial mass or substantial vertical development.

The open-storage and parking uses are experienced in the context of the immediately adjoining industrial estate. They are substantially less visually intrusive than the three industrial buildings previously proposed.

Native hedging along the northern and eastern boundaries will provide a softer transition to the adjoining open land. The two native trees within the parking area will further break up views of hardstanding and vehicles.

The 3m-wide lowered landscaped corridor reinforces this transition and ensures that the edge of the operational area remains open and vegetated.

Subject to reasonable controls over storage height and lighting, the development is capable of being accommodated without unacceptable landscape or visual harm.

18. Highways, Parking and Access

The proposal provides 16 parking spaces principally for staff employed within the existing commercial premises immediately west of the application site.

No new building or employment floorspace is proposed and the parking provision should therefore not be treated as generating the same trip profile as a new commercial development of equivalent parking capacity.

The additional spaces can improve the functioning of the existing estate by reducing informal parking and freeing operational areas for servicing and business activity.

The proposal continues to use the established access arrangement serving the commercial area. The low-intensity open use does not give rise to the scale of servicing or delivery activity associated with three new industrial units.

19. Amenity and Environmental Quality

The proposal sits alongside existing commercial uses and does not introduce new buildings capable of accommodating intensive internal industrial processes.

Potential amenity effects are principally associated with vehicle movements, open storage, lighting and occasional handling of stored items. These are capable of proportionate control by condition.

The Environmental Health consultation on the more intensive BE/112/25/OUT proposal raised no objection subject to conditions, including control of external lighting. The present proposal is materially less intensive in built and operational terms.

Conditions can reasonably control lighting, storage height and the nature of any materials stored if the Council considers such controls necessary.

20. Sequential Approach

The Council's March 2025 pre-application advice recorded that it had no objection to the Sequential Assessment prepared following BE/138/23/OUT. That assessment considered 401 potential alternative sites.

The present proposal has a stronger site-specific locational rationale than the earlier general industrial-building proposal because a substantial part of the scheme comprises staff parking serving the immediately adjoining existing businesses.

An alternative site remote from the businesses would not provide an equivalent operational solution. The functional relationship with the adjoining estate is therefore relevant when considering the practical availability and suitability of alternatives.

The development is also significantly less vulnerable in practical consequence than a building-based scheme because it contains no occupied structure and can be managed during flood events.

21. Response to the Previous Refusal Issues

The current application is not a minor redesign of BE/112/25/OUT. It removes the permanent buildings and addresses the principal issues arising from the earlier applications as follows:

Issue arising from previous applications	Response in the current application
Flood Zone 3 / functional floodplain	No buildings are proposed. The FRA assesses the site-specific hydraulic position and the low-consequence open use rather than assuming the impacts of the former industrial scheme.
Historic land raising	The application expressly seeks retrospective permission for the raised levels and assesses their effects; the issue is no longer avoided or treated merely as background.
Loss of floodplain storage	A 102m × 3m strip will be lowered by 600mm, creating approximately 183.6m ³ of additional potential flood-storage volume.
Further displacement of floodwater	No further general raising and no permanent buildings are proposed.
Flood conveyance	The scheme remains open; the lowered corridor is kept free of parking/storage and available to floodwater.
Historic ditch	Available hydraulic modelling does not identify the historic feature as a discrete essential modelled conveyance element; the FRA nevertheless adopts a cautious approach.
Surface-water drainage	No roofs are proposed; permeable/semi-permeable hardstanding can be used where practicable and runoff burden is substantially reduced.
Ecological effects	Operational land is predominantly hardstanding/disturbed ground. Native hedge, two native trees and 306m ² lowered landscaped margin improve the site edge.
Watercourse protection	No buildings are introduced beside the watercourse; lighting and pollution risks can be controlled and the restoration corridor provides an open landscaped margin.
Landscape character	The three industrial buildings are removed entirely. The proposal is low-profile and screened/softened by native planting.
Highway/parking need	16 spaces principally serve existing adjoining businesses and help resolve an existing staff-parking deficiency.

22. Planning Balance

The principal constraint is flood risk and the history of land raising. Those matters deserve substantial weight, but the decision must assess the development actually proposed and the mitigation now secured.

The current proposal removes all permanent industrial buildings, introduces no new floorspace, requires no further general raising and provides approximately 183.6m³ of additional flood-storage capacity through targeted lowering.

The scheme supports established employment activity by providing staff parking and complementary open-storage space immediately adjacent to the industrial estate.

Its physical effects are limited. The site remains predominantly open; native landscaping softens the edge; and the restoration corridor provides both flood-risk and habitat benefits.

The retrospective element allows the existing position to be regularised through a permission that can secure enforceable mitigation, management and landscape requirements.

The statutory BNG requirement does not apply because the permission sought is retrospective under section 73A, but the scheme nevertheless provides voluntary ecological enhancement.

Taken together, the reduction in development intensity, quantified flood-storage betterment, operational economic benefits and landscape/ecological enhancements materially alter the planning balance from that which applied to BE/112/25/OUT.

23. Suggested Planning Conditions

The proposal is capable of being appropriately controlled through conditions. Without seeking to prescribe the Council's final wording, the following matters could reasonably be secured:

- Implementation of the 102m long × 3m wide floodplain-restoration corridor, lowered by approximately 600mm, before first use of the prospective elements of the permission or within an agreed period.
- Permanent retention of the lowered corridor free from parking, open storage, buildings and other obstructions.
- Implementation and maintenance of the native hedge and two native trees.
- Details/control of any external lighting to avoid unnecessary spill towards the watercourse and landscaped margins.
- A flood-warning and operational management procedure for vehicles and stored materials.
- Controls preventing hazardous or readily floatable materials from being stored in a manner that creates flood or pollution risk.
- A reasonable maximum height for open storage if considered necessary in the interests of landscape and amenity.
- Permeable or semi-permeable surfacing where practicable and appropriate.

24. Conclusions

Planning permission is sought for “Change of use of land to open storage and parking, raising of land levels (retrospective) and laying of hardstanding, associated landscape works”.

The application is fundamentally different from the refused three-unit industrial proposal. It contains no buildings, no new employment floorspace and no residential or sleeping accommodation.

The application openly addresses the historic raising by seeking retrospective permission under section 73A. No further general raising is proposed.

A 102m long × 3m wide corridor will be lowered by 600mm, covering approximately 306m² and providing approximately 183.6m³ of additional potential flood-storage capacity. The corridor will be landscaped and permanently excluded from operational use.

The accompanying FRA demonstrates a materially lower-consequence form of development than the previous industrial scheme and provides a reasoned assessment of historic storage, functional floodplain, conveyance, surface water and user safety.

The operational part of the land is of limited ecological value, being predominantly hardstanding and disturbed ground. Native hedging, trees and the lowered landscaped margin provide positive enhancement while precautionary controls can protect the watercourse corridor.

Mandatory Biodiversity Net Gain does not apply to retrospective planning permission under section 73A. No statutory biodiversity metric or Biodiversity Gain Plan is therefore required.

The 16 parking spaces have a direct operational relationship with the existing commercial estate and provide a practical benefit to established businesses without creating new commercial floorspace.

The proposal therefore responds substantively to the matters raised by the previous applications and represents a proportionate, low-intensity and environmentally improved use of this small parcel immediately adjoining the established industrial estate.

It is respectfully requested that planning permission be granted subject to appropriate conditions.