

MME PLANNING SERVICES

Outline application for the erection of 9no self-build dwellings with all matters reserved.

at

Oakhurst Centre, West Chiltington Lane, Coneyhurst,
West Sussex, RH14 9DP

Planning Statement

Ref: P-009c

March 2025

Version 1

Mr Oguzhan Denizer
MME Planning Services
Email: mmeplanningservices@gmail.com
Tel: 07720 718434



Figure 1: Site Location / Red Line Area

Contents

Contents.....	
1. Introduction	1
2. Site, Surroundings and Background.....	1
3. Planning History.....	2
4. Proposals	3
5. Planning Policy	4
6. Planning Considerations.....	6
7. Summary and Conclusion	16

1. Introduction

- 1.1 We are instructed to prepare and submit this outline planning application with all matters reserved for the demolition of the existing buildings on site and erection of 9no self-build dwellings at Oakhurst Centre, West Chiltington Lane, Coneyhurst, West Sussex, RH14 9DP.
- 1.2 While it is noted that the application is submitted in outline form with all matters reserved, this statement sets out the proposed scheme with regard to the following aspects, the planning history of the site, the development proposals, the relevant planning policy, the planning merits of the scheme and how the proposals comply with the Council's policies.
- 1.3 Specifically, with the Council currently unable to demonstrate a 5-year housing land supply and recently approved applications and appeal decisions, this statement will outline why planning permission should be granted for the proposals.

2. Site, Surroundings and Background

- 2.1 The application site relates to Oakhurst Equestrian Centre which is located on the western side of West Chiltington Lane Coneyhurst. The site area measures 0.5ha and consists of equestrian facilities, commercial units, a paddock and sandschool. The surrounding area is characterised by commercial uses, equestrian uses, farms and individually designed dwellings. The site is considered to be previously developed land. The site is located outside of any defined built-up areas, with the closest built-up area boundary of Billingshurst located some 1.2km away from the site and is therefore considered to be in the countryside in policy terms.
- 2.2 The site is served by an existing vehicular access leading from West Chiltington Lane to the east. It is noted that there is a Public Right of Way (PROW) (1925) which runs through the centre of the site from north to south, and there is another PROW (1924) which runs immediately to the south of the site from east to west. The site is bounded by soft landscaping along the southern boundary of the site. There is a field located to the west of the site, however this is enclosed to all boundaries with soft landscaping.
- 2.3 The application site contains a permitted dwelling positioned towards the northern boundary. The River Adur runs to the north of the site but the site is not considered to be a flood risk zone and categorized as Flood Zone 1.

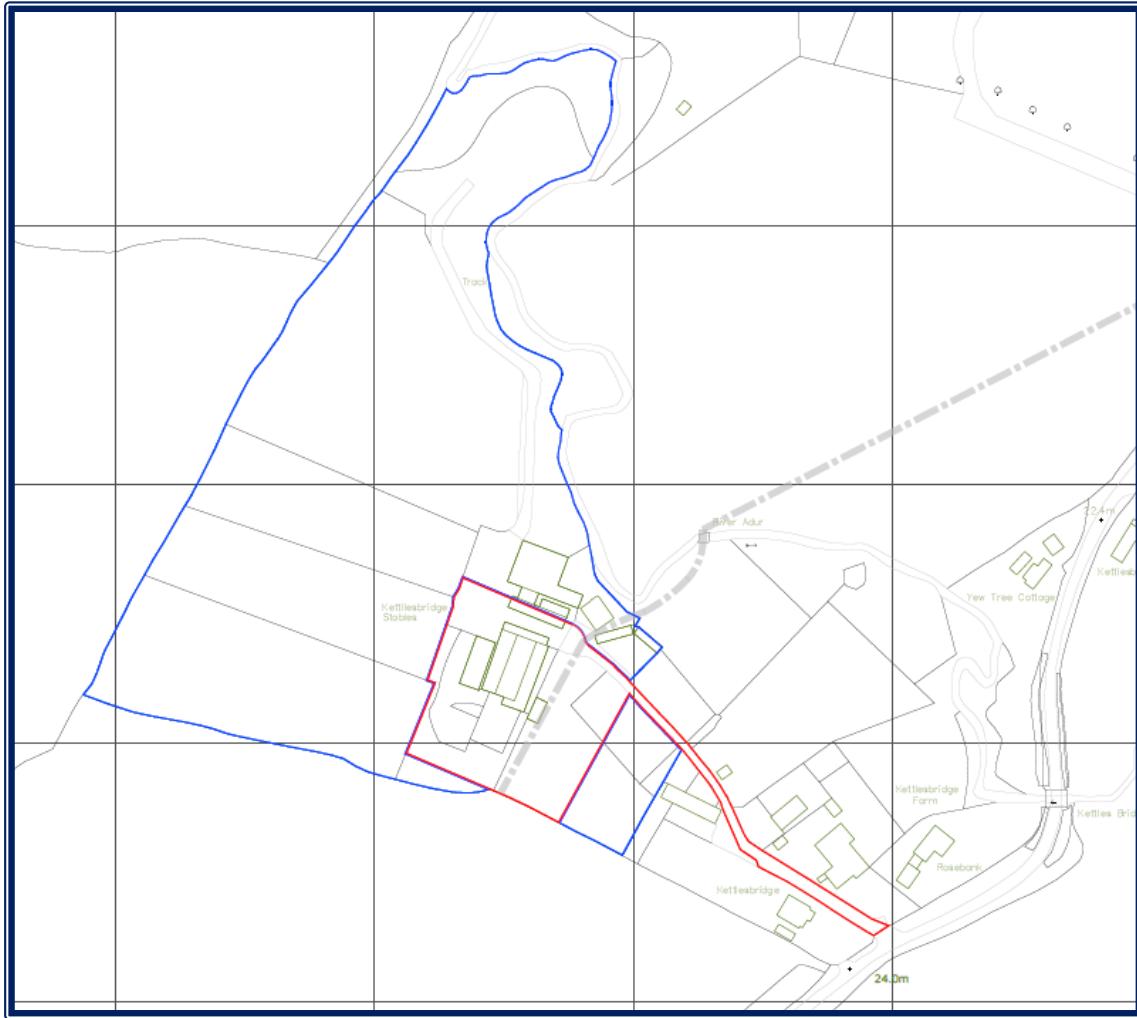


Figure 2: Site Location Plan

3. Planning History

- 3.1 Planning Application – Ref: DC/22/1999 – Description: Proposed settled gypsy accommodation site comprising 12no pitches and associated utility buildings – Decision: Refusal, 31/07/2023.
- 3.2 Planning Application – Ref: DC/23/1854 – Description: Prior Notification for demolition of existing equestrian and commercial/industrial buildings – Decision: Prior Approval Required and Granted, 01/11/2023.
- 3.3 Planning Application – Ref: DC/24/0298 – Description: Proposed settled gypsy accommodation site comprising 10no pitches and associated utility buildings – Decision: Pending

- 3.2 Planning Application – Ref: DC/23/1854 – Description: Prior Notification for demolition of existing equestrian and commercial/industrial buildings – Decision: Prior Approval Required and Granted, 01/11/2023.

- 3.3 Planning Application – Ref: DC/24/0298 – Description: Proposed settled gypsy accommodation site comprising 10no pitches and associated utility buildings – Decision: Pending

4. Proposals

- 4.1 As detailed above, outline planning permission is sought with all matters reserved for the erection of 9no dwellings. While all matters are reserved for later consideration, the plans submitted, provide an indicative layout for the proposals.
- 4.2 The proposals, while all matters are reserved, would consist of two-storey dwellings, with single storey projections. An indicative site plan is provided, which shows an appropriate quantum of development for the site, appropriate garden areas and parking.



Figure 4: Indicative Site Plan

- 4.3 Again, while reserved for later consideration, the indicative plans also show the access to serve the proposed dwellings from the public highway (West Chilton Lane) to the east as per the existing access serving the site. The surrounding area consists of a mixture of dwellings all with differing designs, positioning with their respective curtilages and plot sizes.

- 4.4 The proposed development is considered to be appropriately separated from neighbouring properties and would provide a good level of accommodation for future occupiers. The indicative positioning of the proposed dwellings and distances maintained would ensure no harmful impact in terms of loss of outlook, light, privacy, or overbearing presence."

5. Planning Policy

National Planning Policy Framework (NPPF) (2024)

- 5.1 The NPPF sets out the Government's planning policies for England and Wales and how these should be applied. It provides a framework for the preparation of local plans for housing and other development. The NPPF should be read as a whole.
- 5.2 Running throughout the NPPF is a presumption in favour of sustainable development. Sustainable development is achieved through three main objectives which are – economic, social and environmental.
- 5.3 Paragraph 11 of the NPPF states that for decision-making, this means approving development proposals that accord with an up-to-date development plan without delay. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, planning permission should be granted unless the policies of the Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed, or, any adverse impact of doing so would 'significantly and demonstrably outweigh the benefits' when assessed against the policies of the NPPF when taken as a whole (NPPF paragraph 11(d)).

Horsham District Planning Framework (HDPF) (2015)

- 5.4 Paragraph 34 of the NPPF requires that all development plans complete their reviews no later than 5 years from their adoption. Horsham District Council has submitted its new local plan for examination, however at this stage, the emerging policies carry only limited weight in decision making. This position is further highlighted given that the Horsham District Local Plan examination hearing meetings scheduled for January 2025 were cancelled by the appointed Inspector, as confirmed in their letter dated 16 December 2024, which is available on the Council's website.

- 5.5 A Local Development Scheme (LDS) was published in February 2025 by the Council. The LDS sets out the production timetable for the New Local Plan anticipated to be adopted April 2026. Notwithstanding the above, as the HDPF is now over 5 years old, the most important policies for determining this application are now considered to be 'out of date'.
- 5.6 The Council is currently unable to demonstrate a 5-year supply of deliverable housing sites. The presumption in favour of development within Paragraph 11(d) of the NPPF therefore applies in the consideration of all applications for housing development within the District, with Policies 2, 4, 15 and 26 now carrying limited weight in decision making. This is also the case for the Billingshurst Neighbourhood Plan.
- 5.7 While considered to be out of date, the main HDPF policies relevant to this application are as follows:
- Policy 1 - Strategic Policy: Sustainable Development
 - Policy 2 - Strategic Policy: Strategic Development
 - Policy 3 - Strategic Policy: Development Hierarchy
 - Policy 4 - Strategic Policy: Settlement Expansion
 - Policy 7 - Strategic Policy: Economic Growth
 - Policy 9 - Employment Development
 - Policy 10 - Rural Economic Development
 - Policy 15 - Strategic Policy: Housing Provision
 - Policy 16 - Strategic Policy: Meeting Local Housing Needs
 - Policy 24 - Strategic Policy: Environmental Protection
 - Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
 - Policy 26 - Strategic Policy: Countryside Protection
 - Policy 29 - Equestrian Development
 - Policy 31 - Green Infrastructure and Biodiversity
 - Policy 32 - Strategic Policy: The Quality of New Development
 - Policy 33 - Development Principles
 - Policy 35 - Strategic Policy: Climate Change
 - Policy 36 - Strategic Policy: Appropriate Energy Use
 - Policy 37 - Sustainable Construction
 - Policy 38 - Strategic Policy: Flooding
 - Policy 40 - Sustainable Transport
 - Policy 41 - Parking

Billingshurst Neighbourhood Plan (BNP) (2021)

5.8 Neighbourhood Plan policies relevant to this application are as follows:

- Policy BILL 1 – Billingshurst built-up area boundary
- Policy BILL 2 – Housing design and character
- Policy BILL 3 – Energy Efficiency and Design
- Policy BILL 12 – Protection and Enhancement of Key Movement Routes
- Policy BILL 14 – Residential Parking Provision

Planning Advice Note(s) (PAN)

5.9 Relevant PAN's to this application are as follows:

- Facilitating Appropriate Development
- Biodiversity and Green Infrastructure

6. Planning Considerations

Principle of Development

- 6.1 The HDPF spatial development strategy as contained within policies 2, 3 & 4 directs development to sites within built-up area boundaries, encourage the effective use of brownfield land, and aim to manage development around the edges of existing settlements in order to protect the rural character and landscape.
- 6.2 The site is located outside of the built-up area and is not allocated within Horsham's adopted development plan (comprising in this case the HDPF and the BNP), although it is again noted that these are now out of date. As a result, residential development in this location would conflict with the requirements of Policies 2 and 4 (Settlement Expansion) of the HDPF, as well as Policy Bill 1 of the BNP. The site is also not in an isolated location therefore the opportunities afforded by Paragraph 84 of the NPPF do not apply in this instance.
- 6.3 Parts a and b of Policy Bill 1 in the Billingshurst Neighbourhood Plan states that "development in Billingshurst parish shall be focused within the proposed built-up area boundary of Billingshurst village as shown on the Policies Maps in Section 12".

- 6.4 Notwithstanding the above, the Council is currently unable to demonstrate a five-year housing land supply, with the latest Authority Monitoring Report (January 2024) detailing a supply of only 2.9 years. Therefore, the tilted balance contained in paragraph 11(d) of the NPPF is engaged.
- 6.5 While the Council has issued the LDS, and the new local plan has been submitted for examination, limited weight is attached to the emerging policies at this stage.
- 6.6 Further to the above, Paragraph 14 of the NPPF notes that “in situations where the presumption (at paragraph 11(d)) 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”.
- 6.7 It is highlighted that the BNP does not include allocations to meet the Parish’s housing needs, therefore paragraph 14 of the NPPF as set out above, does not apply and the presumption in favour of sustainable development would not be affected in this instance.
- 6.8 As detailed above, the site is located outside of any defined built-up area boundaries and is therefore considered to be located in the countryside in policy terms. Notwithstanding this, given this immediate context, it is not considered that the site is in a location where development should be strictly limited, and the site is not considered to be isolated, given the presence of neighbouring development and the existing uses on site. The countryside location does not, as such, weigh significantly against the proposal in this instance. HDPF Policy 26 requires proposals to be of a scale appropriate to countryside character and location.
- 6.9 In addition to the above, the proposal would also be acceptable in principle as it represents development on previously developed land / brownfield land. The definition of previously developed land within the NPPF is as follows – *“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.*

This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape”.

- 6.10 The use and more effective use of previously developed land attracts support in the NPPF, as well as in Policy 2 of the HDPF. Under the definition set out above, given the use of the site for commercial and equestrian purposes and the existing buildings on site, the site is classed as previously developed land / brownfield land. This weighs in favour of the proposed development.
- 6.11 It is noted that there are a number of recent decisions that have granted residential developments outside of the defined built-up areas in other parts of the District. Examples include reference numbers DC/22/0495 and DC/22/2250 which each sought permission for 1no dwelling and were granted at appeal in August 2023 and March 2024 respectively and DC/23/2278 which sought permission for 8no dwellings and was granted by the Council’s planning committee North in April 2024. The application site under reference DC/23/2278 was located approximately 4.5km away from the closest settlement boundary.
- 6.12 Further, more recent examples of applications for the conversion of existing buildings to dwellings include reference numbers DC/23/0627 which sought permission for the conversion of stables and was granted at appeal in December 2024; DC/21/0501 and DC/24/1710 which each sought permission for the conversion of existing buildings to form 1no dwelling and both granted under delegated powers by the Council in January 2025 and DC/23/1023, which also sought permission for the conversion of an existing building to form 1no dwelling and was granted under delegated powers by the Council in March 2025.
- 6.13 While it is acknowledged that every application and site context should be considered on its own merits, taking into account the current situation of the Council in terms of its 5-year housing supply and the above examples, there is an expectation that a consistent approach should be applied to decision making.

- 6.14 It is highlighted that these permitted dwellings were located a significant distance away from any defined built-up areas. The above examples clearly show that notwithstanding the distances to the respective settlement boundaries, these boundaries are now considered to be out of date given the lack of 5-year housing supply. As such, the tilted balance is engaged and the principle of residential development in this location is acceptable.
- 6.15 This position is confirmed by the Inspector within the appeal decision in relation to application reference DC/22/0495, which states *“I have attached limited weight to the conflict with HDPF Policy 26 in respect of development outside of built-up area boundaries. The housing shortfall dictates that those boundaries are out of date. I consider that some weight can still be given to the strategy set out within HDPF Policy 2, in terms of the general locations of new development, but the fact that a site may lie outside of the built-up area boundary does not, in and of itself, constitute a reason to refuse planning permission”*.
- 6.16 Notwithstanding this viewpoint, it is also considered that the proposal would accord with criterion 4 of Policy 26 of the HDPF, as it would enable the sustainable development of rural areas. This would be the case for this application site, with the application seeking the conversion of an existing building on previously developed land and as future occupiers would have access to a range of facilities and services located in Horsham, similar to existing residents within Forest Grange.
- 6.17 The housing supply position of the Council is deficient. 9no additional dwellings would contribute significantly towards the much-needed supply of houses. Small sites can often be built out relatively quickly and there would be economic benefits arising from construction and spend in the local economy. As such, 9no additional dwellings would be valuable given the Council’s housing land supply.
- 6.18 In summary, given the lack of a 5-year housing supply, the site being designated as previously developed land, and relevant recent examples of housing developments permitted outside of settlement boundaries, the principle of residential development is therefore acceptable.

Housing Mix

- 6.19 Policy 16 of the HDPF states that development should provide a mix of housing sizes, types and tenures appropriate to the character and density of the surrounding area.

- 6.20 The indicative proposals would provide four 2-bed, three 3-bed and two 4-bed dwellings, which is considered to be an appropriate mix and would make a good contribution to local housing supply, in line with Policy 16 of the HDPF.
- 6.21 Affordable housing contributions are not pursued on development of less than 10 units, as detailed within the NPPF, which sets out that affordable housing should not be sought for residential developments that are not major developments. The proposal therefore does not incorporate the provision of affordable housing.

Loss of Existing Buildings

- 6.22 As detailed by the Council in their consideration of application reference DC/22/1999, “Oakhurst Equestrian Centre is a small facility not considered to constitute an ‘employment site’, where the adverse effects of development upon the viability of the Centre would warrant objection in relation to provisions of HDPF Policy 7”.
- 6.23 Policy 9 of the HDPF states that “Redevelopment of employment sites and premises outside Key Employment Areas, must demonstrate that the site/premises is no longer needed and/or viable for employment use”. As detailed above, the applicant has confirmed that the existing buildings on site are no longer needed, with a number of units / buildings vacant or in limited use.
- 6.24 A Prior Notification application for the demolition of all of the buildings on site was submitted and permitted by the Council in November 2023, under planning reference DC/23/1854. This Prior Approval consent not only confirms that the demolition of the structures on site is acceptable but also represents a realistic fall-back with regards to the loss of the employment buildings. The proposals are therefore considered to be acceptable in this regard.
- 6.25 Overall, the principle of the re-development of the application site for housing is considered to be acceptable and in accordance with the relevant policies, as set out above.

Design and Appearance

- 6.26 Policy 25 of the HDPF seeks to protect the natural environment and landscape character of the District, including the landform, development pattern, together with protected landscapes and habitats. Development will be required to protect, conserve, and enhance landscape and townscape character, taking account of areas or features identified as being of landscape importance, individual settlement characteristics and settlement separation. In addition, development will be supported where it maintains and enhances the Green Infrastructure Network.
- 6.27 Policies 32 and 33 of the HDPF require development to be of a high standard of design and layout. Development proposals must be locally distinctive in character and respect the character of their surroundings. Where relevant, the scale, massing and appearance of development will be required to relate sympathetically with its built-surroundings, landscape, open spaces and to consider any impact on the skyline and important views.
- 6.28 Policy BILL 2 of the BNP seeks to ensure that development is guided by principles in the Billingshurst Parish Design Statement, and where practicable, inter alia, incorporate appropriate soft-landscaping, provide for staggered layouts as opposed to uniform lines of properties, provide appropriate off-road parking, provide accessible and attractive public open spaces, be appropriate in scale, vernacular and the use of materials to surrounding development and preserve existing natural features.
- 6.29 It is acknowledged that the application site falls within Landscape Character Area (LCA) J1 (Billingshurst and North Heath Farmlands) as categorised within the Horsham Landscape Character Assessment (2003).
- 6.30 The 2003 Character Assessment describes the key characteristics of this LCA as a semi-enclosed landscape with limited longer-range views in response to its gently undulating landform, the pattern of small to medium sized fields enclosed by treed-hedgerows, copses and small woodlands. The Character Assessment recommends that the mostly rural character of the area is conserved, that any development is responsive to the historic settlement pattern, local design and materials, well-integrated with the surrounding landscape through setting within the existing pattern of small woodlands and hedgerows. The Character Assessment, further, recommends the conservation of the pattern of small irregular fields, existing woodland and hedgerow trees, the restoration of parkland and landscape improvements along the A29.

- 6.31 As detailed above, while the current application is submitted in outline form with appearance, layout, landscaping and scale all reserved for later consideration, the indicative quantum of development and layout are considered to be commensurate within this context given the mixture of dwelling and plot sizes. The indicative proposals would not encroach any further towards the west and would be contained within the existing commercial / equestrian yard area, and demarcated section of the site.
- 6.32 Attention is drawn to Reason for Refusal 1 under planning reference DC/22/1999, which related to the landscape impact and urbanising effect on the rural setting. This is considered to be one of the main reasons for siting the development within the previously developed area of Oakhurst Centre. It is therefore considered that the existing pattern of development, and the irregular shaped field to the west would be retained, as detailed within the LCA, with all existing hard and soft landscaping to boundaries retained. Landscaping would be fully addressed as part of a subsequent reserved matters application.
- 6.33 In addition to the above, it is considered that the existing buildings on site are of no architectural merit and represent a mishmash of forms, appearances and materials which are harmful to the rural setting. The proposals, while appearance and scale are reserved for later consideration, would consist of purpose-built dwellings, which would be appropriately designed with sympathetic materials used, resulting in an enhancement of the site and the rural setting, given the context and the existing built form on site.
- 6.34 Given the significant distance retained, the proposed development would not be visible from West Chilton Lane to the east. Notwithstanding this, it is noted that there are 2no PROWs located in and around the site. As indicated on the indicative plans, PROW 1925 running through the site from north to south would not be impacted by the proposed development. PROW 1924 runs to the south, parallel to the southern boundary of the site, however views into the site would be limited given the existing soft landscaping present along the southern boundary.
- 6.35 In addition to the above, taking into account the previous developed nature of the site, it is considered that the proposed development would have a neutral impact within the wider landscape setting when compared to the existing development on site, and would therefore not be harmful in this location.

- 6.36 Given that the proposals would replace existing development, therefore retaining the surrounding undeveloped fields, and the residential nature of the proposed use, it is not considered that the proposed development would result in marked increase in harmful activity or intensification of activity within the countryside beyond that of the existing uses of the site.
- 6.37 Overall, the indicative proposals would be compliant with the provisions of Policies 25, 26, 32 and 33 of the HDPF in terms of landscape impact, and intensification of activity in the countryside.

Heritage Impacts

- 6.38 Policy 34 to the HDPF concerns cultural and heritage assets and provides that the Council will sustain and enhance its historic environment by positively managing the development affecting heritage assets.
- 6.39 Applications for such development must make appropriate reference to the significance of heritage assets, reflect current best practice guidance, reinforce the special interest of the District's historic environment through development of appropriate character, siting, scale, form and design, materials, and techniques, and retain the setting of heritage assets.
- 6.40 Taking into account the distances preserved to the listed building to the east of the site at Yew Tree and Kettlesbridge Cottages in addition to Fewhurst and Palmer's Farm, as well as the presence of existing development and soft landscaping and the nature and extent of the proposed development, it is not considered that the indicative proposals would have a detrimental impact on the significance of the listed buildings.
- 6.41 The proposal would, therefore, have a neutral effect on the designated heritage assets and is acceptable in this regard.

Water Neutrality

- 6.42 The application site falls within the Sussex North Water Supply Zone as defined by Natural England which draws its water supply from groundwater abstraction at Hardham. Natural England has issued a Position Statement for applications within the Sussex North Water Supply Zone which states that it cannot be concluded with the required degree of certainty that new development in this zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites.

- 6.43 Natural England advises that plans and projects affecting sites where an existing adverse effect is known will be required to demonstrate, with sufficient certainty, that they will not contribute further to an existing adverse effect. The received advice note advises that the matter of water neutrality should be addressed in assessments to agree and ensure that water use is offset for all new developments within the Sussex North Water Supply Zone.
- 6.44 The application is supported by a detailed Water Neutrality Statement which sets out through the use of efficient fixtures and fittings and rainwater harvesting using the roof areas of the proposed dwellings / buildings, that the proposed development would be water neutral. Full details are set out within the Water Neutrality Statement and are not repeated in this statement to avoid duplication of the information.
- 6.45 As such, the grant of outline planning permission would not therefore adversely affect the integrity of these sites or otherwise conflict with Policy 31 of the HDPF, NPPF paragraph 180 and the Council's obligations under the Conservation of Habitats and Species Regulations 2017.

Neighbouring Amenity

- 6.46 Policy 33 of the HDPF states that permission will be granted for development that does not cause unacceptable harm to the amenity of the occupiers/users of nearby properties and land.
- 6.47 Given the relationship of the proposed dwellings, as indicated on the indicative site plan provided, with neighbouring properties, and the existing uses within the site and the mixture of uses within the immediate vicinity, it is considered unlikely that the proposal would adversely affect the nearest neighbouring development by reason of loss of privacy, noise, or disturbance. Appropriate-sized gardens would be provided for the proposed dwellings which would be commensurate with neighbouring residential properties within the area.

Parking and Highways

- 6.48 Policies 40 and 41 of the Horsham District Planning Framework relates to transport and parking, and states that more transport choice including community transport where appropriate will be encouraged, as well as a reduction in private car use and greater accessibility to more sustainable modes of transport. Adequate parking and facilities must be provided within developments to meet the needs of anticipated users.

- 6.49 The proposed development is of a scale which would not materially influence the operation of the highway network at a strategic scale. While access is reserved for later consideration, the indicative plans indicate that the proposals would be served by an existing access to the site, and as such, no highway safety concerns would be apparent. Given the existing use of the site, the provision of 9no dwellings would not result in a marked increase in trips to and from the site which would be detrimental to the function of the highway network, particularly when compared to the existing uses of the site.
- 6.50 In addition to the above, it is noted that the nearest settlement is Billingshurst, about 1.2 km away. There are options for using other means of transport than a car, although less so for people with disabilities, the elderly or the very young given the distances involved and the nature of the routes. As such, the use of the private car would be the predominant mode of travel. Nevertheless, the site is considered to be suitably located and it is considered that there would be no conflict with HDPF Policy 40 in this regard.
- 6.51 With regards to parking, the submitted plans indicate sufficient parking provision to serve each of the properties, with sufficient space available for circulation and cycle storage. The application would, therefore, be in accordance with Policy 41 of the HDPF, and overall, no highway or parking concerns would be raised as a result of the proposed development.

Ecological and Biodiversity Considerations / Enhancements

- 6.52 Policy 31 of the HDPF states that –
- “Development will be supported where it can demonstrate that it maintains or enhances the existing network of green infrastructure. Development proposals will be required to contribute to the enhancement of existing biodiversity and should create and manage new habitats where appropriate. The Council will support new development which retains and/or enhances significant features of nature conservation on development sites. The Council will also support development which makes a positive contribution to biodiversity through the creation of green spaces, and linkages between habitats to create local and regional ecological networks”.
- 6.53 The application is supported by a detailed Preliminary Ecological Assessment (PEA) and a Bat Survey Report as well as proposals for ecological enhancements and recommendations for further surveys.

- 6.54 The recommended surveys can be conducted from mid-March onwards, and therefore suitable conditions can be added to ensure that these surveys are conducted and provided to the Council prior to the commencement of development, together with any mitigation and enhancement measures to be secured. As such, the proposals would be in accordance with Policy 31 of the HDPF.

Drainage and Flood Risk

- 6.55 The current application site area is not located in an area of flood risk (Flood Zone 1) and the site area is less than 1ha. No constraints exist in terms of ground stability or proximity to hazardous installations and it is noted that the proposed indicative development would be wholly contained within an area which is classified as previously developed land. Taking the above into account, it is considered that a site-specific Flood Risk Assessment would not be required for this application.
- 6.56 Appropriate provisions would be made to provide services for foul and surface water drainage, and the applicant would be happy for this to be controlled via an appropriate condition. The proposal, therefore, complies with the requirements of Policy 38 of the HDPF.

7. Summary and Conclusion

- 7.1 Overall, given the position of the Council with regards to its 5-year housing supply, the site being classed as a previously developed land, and recent decisions relating to residential development outside of built-up areas, the proposal represents an appropriate form of development in this location.
- 7.2 The indicative proposals would be acceptable in terms of design and impact on the setting, and would not appear prominently within this context given the mixture of dwellings within the surrounding area and the existing uses and building forms on the site.
- 7.3 The proposals would also be acceptable when considered against all other material matters, including that the development would be water neutral, as detailed within this statement and supporting information, notwithstanding the fact that it is submitted in outline form with all matters reserved.

- 7.4 As such, while now considered to be out of date, the proposals would be in accordance with Policies 4, 25, 26, 31, 32 and 33 of the HDPF and therefore, the Local Planning Authority is respectfully asked to grant permission accordingly.