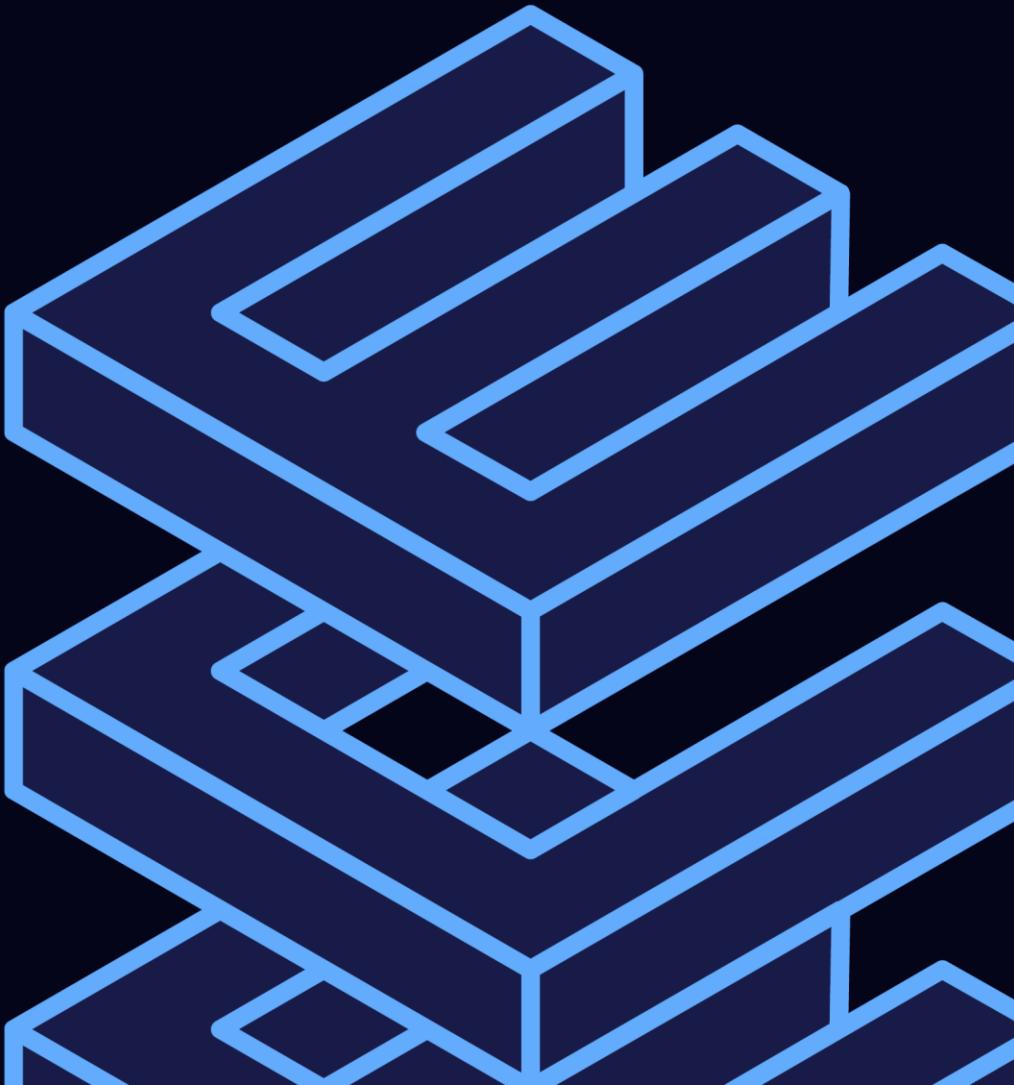


ECE Planning

Planning, Energy and Sustainability Statement

**Land adjoining No. 2 and No. 3
Townhouse Cottages, Thakeham**

November 2025



ECE Planning
64 – 68 Brighton Road, Worthing
West Sussex, BN11 2EN

www.eceplanning.com

info@eceplanning.com

01903 248777

Project Name: Townhouse, Thakeham

Location Land adjoining No. 2 and No. 3 Townhouse Cottages,
Townhouse Farm, Coolham Road, Thakeham, RH20
3EW

Client: Fowlers Land and New Homes

File Reference: P2176

Issue	Date	Author	Checked	Notes
PL1	07.08.2025	D Hearle	R Hoad	Initial Draft
PL2	12.11.2025	R Hoad	C Barker	Client Issue
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Contents

1. Introduction	5
2. The Site	6
3. Planning History	17
3.2. The Site's Planning History	17
3.3. Townhouse Farm Planning History	18
4. The Proposal	19
5. Policy Overview	21
5.1. Introduction	21
5.3. National Planning Policy Framework (NPPF)	21
5.4. Planning Practice Guidance (PPG)	22
5.5. Strategic Planning Policy – Horsham District Planning Framework (2015)	22
5.6. Shaping Development in Horsham District	22
5.7. Thakeham Neighbourhood Plan (2017)	22
5.8. Community Infrastructure Levy (CIL)	23
6. Planning Appraisal	24
6.1. Introduction	24
6.2. Principle of Development	24
6.3. Design, Form and Appearance	26
6.4. Residential Amenity	27
6.5. Access, Transport and Parking	29
6.6. Ecology and Biodiversity Net Gain	30
6.7. Trees and Landscaping	30
6.8. Drainage	31
7. Conclusion	32
Appendix A – Pre-Application Response for Reference PE/24/0227 Dated January 2025	34
Appendix B – Appeal decision at Abbots Leigh, Washington Road, Storrington (Ref: APP/Z3825/W/25/3363148)	35
Appendix C – Compass Travel Bus Schedule	36

Figures

Figure 1 - Location Plan (Source: Nimbus Maps)	6
Figure 2 - Image of Storage Unit (Source: Google Maps, 2024)	7
Figure 3 - Proximity to Archaeological Site	7
Figure 4 - Thakeham Conservation Area and Nearby Listed Buildings	8
Figure 5 - Proximity to Thakeham Built-Up Area Boundary.....	8
Figure 6 - Withdrawn Regulation 19 Local Plan Built-Up Area of Thakeham	9
Figure 7 - Local Facilities	10
Figure 8 - West Sussex County Council Public Rights of Way Map	11
Figure 9 - Photograph 1 of Footpath Reference 2474	11
Figure 10 - Photograph 2 of Footpath Reference 2474	12
Figure 11 - Footpath to the South of Footpath Reference 2474	13
Figure 12 - Additional Southern Footpath Connecting to Storrington Road	13
Figure 13 - Path Leading from Footpath Reference 2474 to Western Side of Storrington Road	14
Figure 14 - Pedestrian Crossing on Western Side of Storrington Road	14
Figure 15 - Pedestrian Crossing on Eastern Side of Storrington Road	15
Figure 16 - Nearby Bus Stops	15
Figure 17 - Government's Flood Maps for Planning	16
Figure 18 - Government's Flood Maps for Planning - Surface Water Drainage.....	16
Figure 19 - Pre-Application Indicative Site Layout (Reference PE/24/0227)	18
Figure 20 - Proposed Site Plan	19
Figure 21 - Proposed Sections	19
Figure 22 - Proposed Sections including Car Ports	20
Figure 23 - Proposed Separation Distances	28

1. Introduction

- 1.1. This Planning Statement including Energy and Sustainability Statement has been produced by ECE Planning on behalf of our client, **Fowlers Land and New Homes** in support of a Planning Application for development at Land adjoining No. 2 and No. 3 Townhouse Cottages, Coolham Road, Thakeham ('the Site'). The description of the proposal reads:

"Demolition of Existing Storage Unit and erection of 2no. detached dwellings, associated private gardens, parking and landscaping."

- 1.2. This application follows pre-application discussions with Horsham District Council (HDC) under reference PE/24/0227 for the *"Demolition of Existing Storage Unit and erection of 3no. dwellings (1no. detached and 2no. semi-detached dwellings), associated private gardens, parking and landscaping."* Following feedback received from HDC, the quantum of development has been reduced from 3no. dwellings to 2no. dwellings. This is discussed in further detail later in this Statement.
- 1.3. Additionally, this Statement sets out the relevant background for the determination of the planning application, including a description of the site and its surroundings, the planning history, the relevant planning policy, details of the proposed development and an assessment of relevant planning conditions.
- 1.4. The proposals have also been informed by the National Planning Policy Framework, the Planning Practice Guidance, and local planning policy.
- 1.5. This application for Full Planning Permission is accompanied by the following supporting documents:

- **Application Forms, Notices and CIL Forms**
- **Planning Statement including Energy and Sustainability Statement**
- **Architectural Drawings comprising Location plan, block plan, existing and proposed elevations, proposed floor plans/roof plans**
- **Design & Access Statement**
- **Topographical Survey**
- **Arboricultural Statement / Tree Survey**
- **Ecological Appraisal, BNG Metric and Biodiversity Gain Statement**
- **Surface Water Drainage Statement**

2. The Site

- 2.1. The site is located to the west of Duke's Hill (the B2139) in Thakeham, as illustrated in Figure 1. The total calculated area of the site (not including access road) is approximately 0.04ha.



Figure 1 - Location Plan (Source: Nimbus Maps)

- 2.2. The land is privately owned by the Applicant and co-owners, and the rear section is currently licensed to a neighbouring dwelling (No. 2 Townhouse Cottages) for use as additional residential garden. The eastern boundary of the land benefits from an established boundary which is well screened from Duke's Hill. The land can be accessed via Duke's Hill and an existing established road which already serves a number of residential properties in Townhouse Farm.
- 2.3. The front (west) section of the site is occupied by a container unit which stores agricultural equipment in association with the wider land at Townhouse Farm. Refer to Figure 2 for photograph of storage unit.



Figure 2 - Image of Storage Unit (Source: Google Maps, 2024)

- 2.4. Horsham District Council's Local Plan Mapping has been reviewed and reveals that the site is not directly constrained by any heritage or landscape designations including Tree Preservation Orders (TPOs).
- 2.5. It is noted that an Archaeological Site is situated approximately 115m to the south of the site but does not directly affect the land. Refer to the below Figure.



Figure 3 - Proximity to Archaeological Site

- 2.6. The site is otherwise not occupied by a Listed Building or within a Conservation Area. The closest Conservation Area is situated to the east of the site as illustrated in the below Figure. The closest Listed Building is situated circa 215m away to the east of the site at 'The Old Rectory' and 'Mansion House' as indicated below (1285062) (1027213).

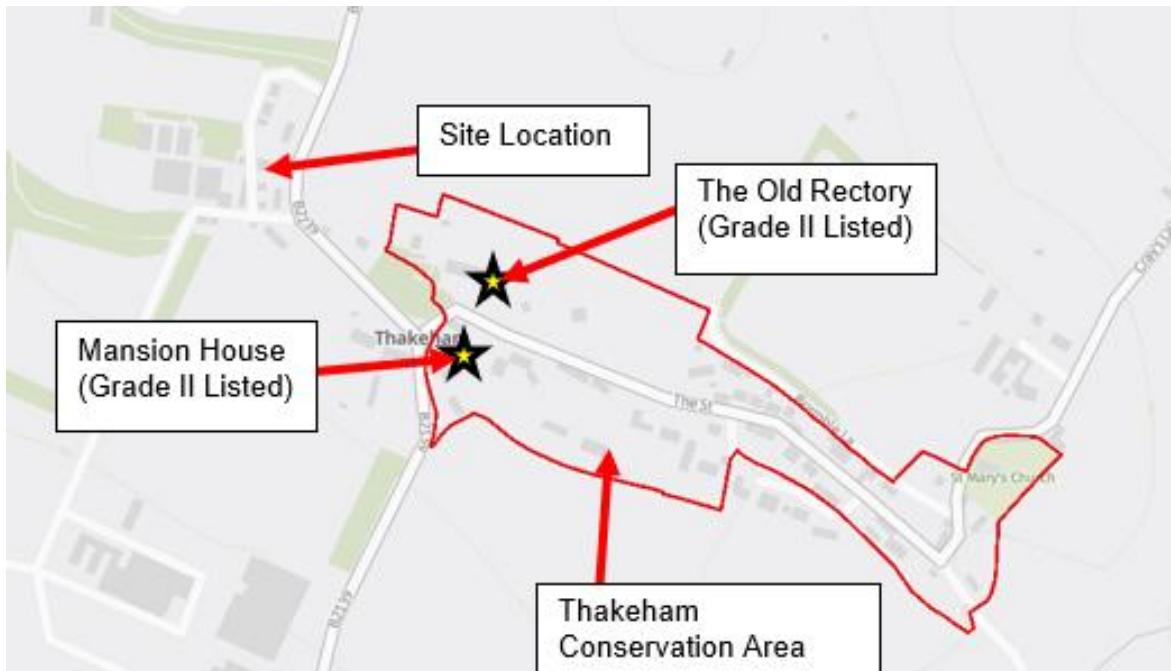


Figure 4 - Thakeham Conservation Area and Nearby Listed Buildings

- 2.7. The site is situated approximately 200m from the Built-Up Area Boundary of Thakeham as demonstrated in the below snippet.

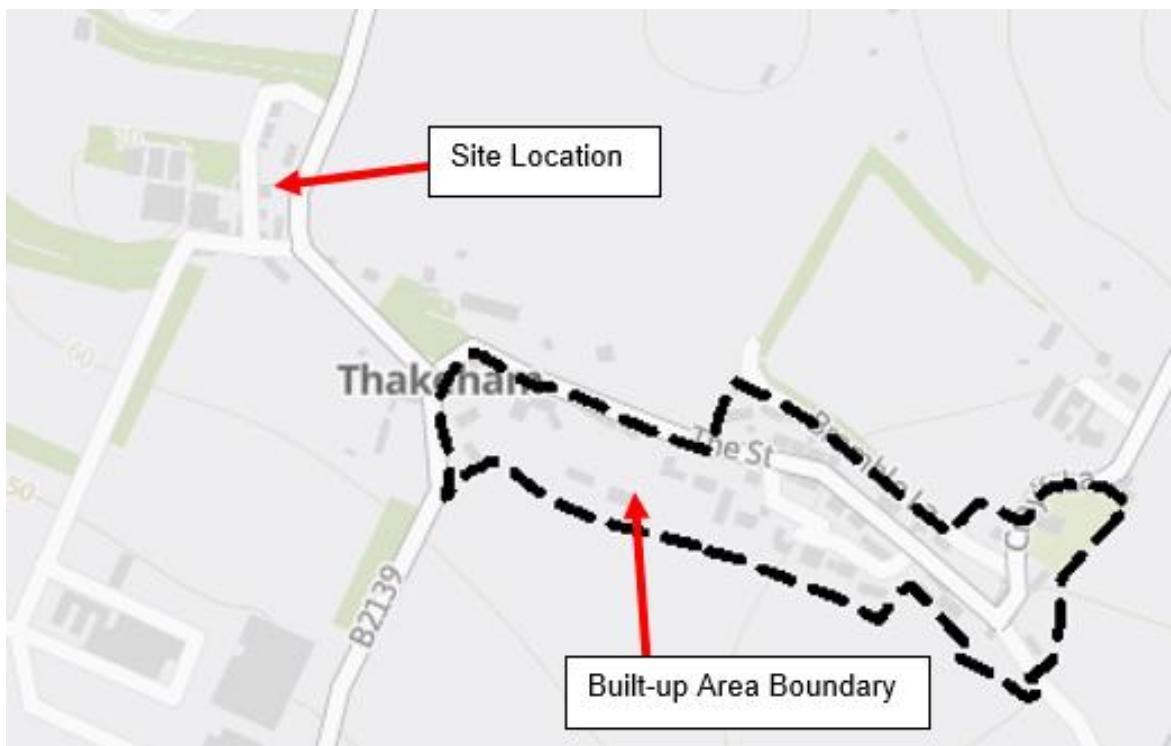


Figure 5 - Proximity to Thakeham Built-Up Area Boundary

- 2.8. It should be noted that the withdrawn Regulation 19 Local Plan sought to significantly amend Thakeham's built area as indicated below. For reference, the yellow area to the south is a Neighbourhood Plan allocation known as 'Off Storrington Rd Mushroom Site'. This is explored in further detail in the Planning History section of this Letter.

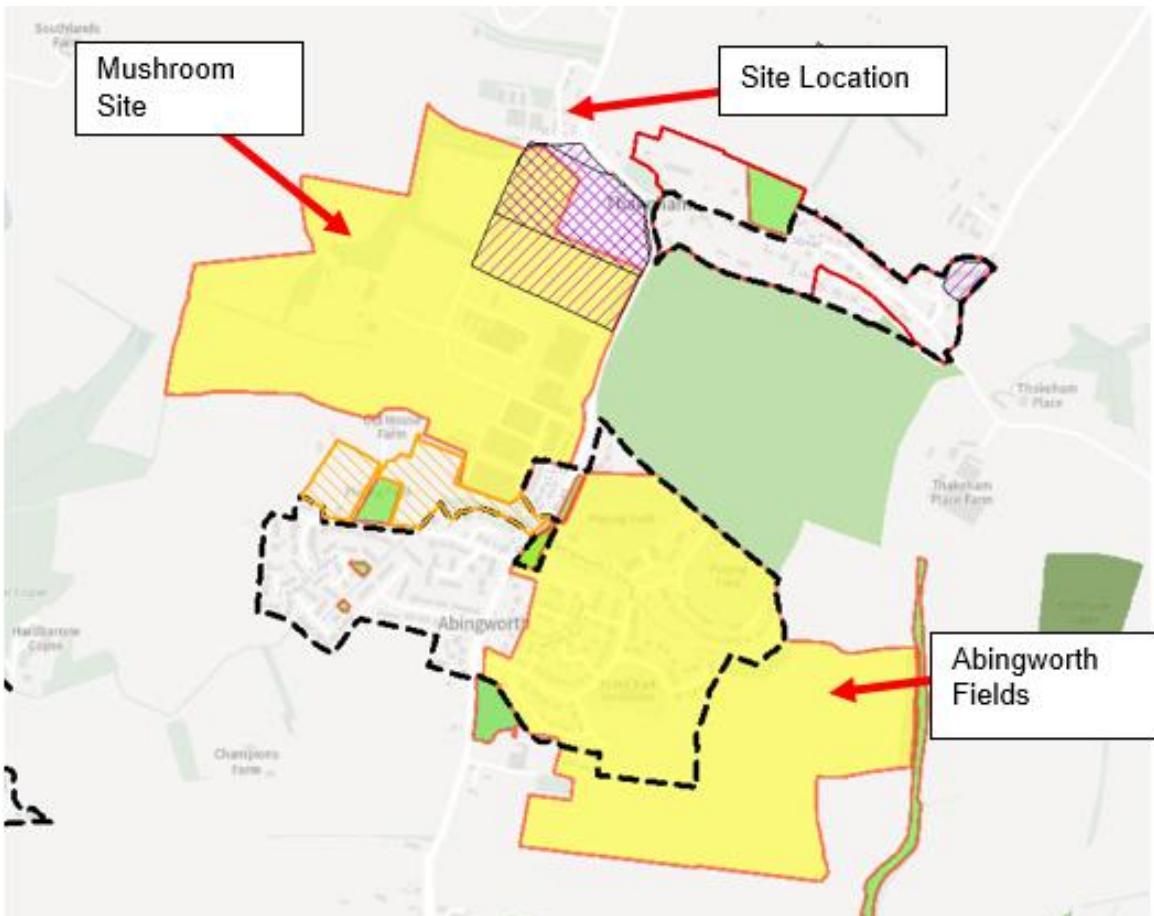


Figure 6 - Withdrawn Regulation 19 Local Plan Built-Up Area of Thakeham

- 2.9. As illustrated above and whilst noting that the emerging Local Plan has now been withdrawn, the District Council's intention for Thakeham is to significantly expand the village. Abingworth Fields to the south-east of the village has almost completed construction and accommodates a number of new facilities for the local community such as a new Cricket Ground, a Village Hall and a Café and convenience store. In addition and to the east of the proposed site, circa 500m away, is a Public House known as The White Lion Inn. As illustrated in the below Figure, a number of children play areas and public open spaces are also within close proximity to the site. As discussed in further detail later in this Statement, the site is well connected to the immediacy and local services.
- 2.10. Although not indicated in the below Figure, to the north of the site circa 1.31km is Kinsbrook Vineyard Restaurant and Grocery which provides the village with further access to every day essential items.

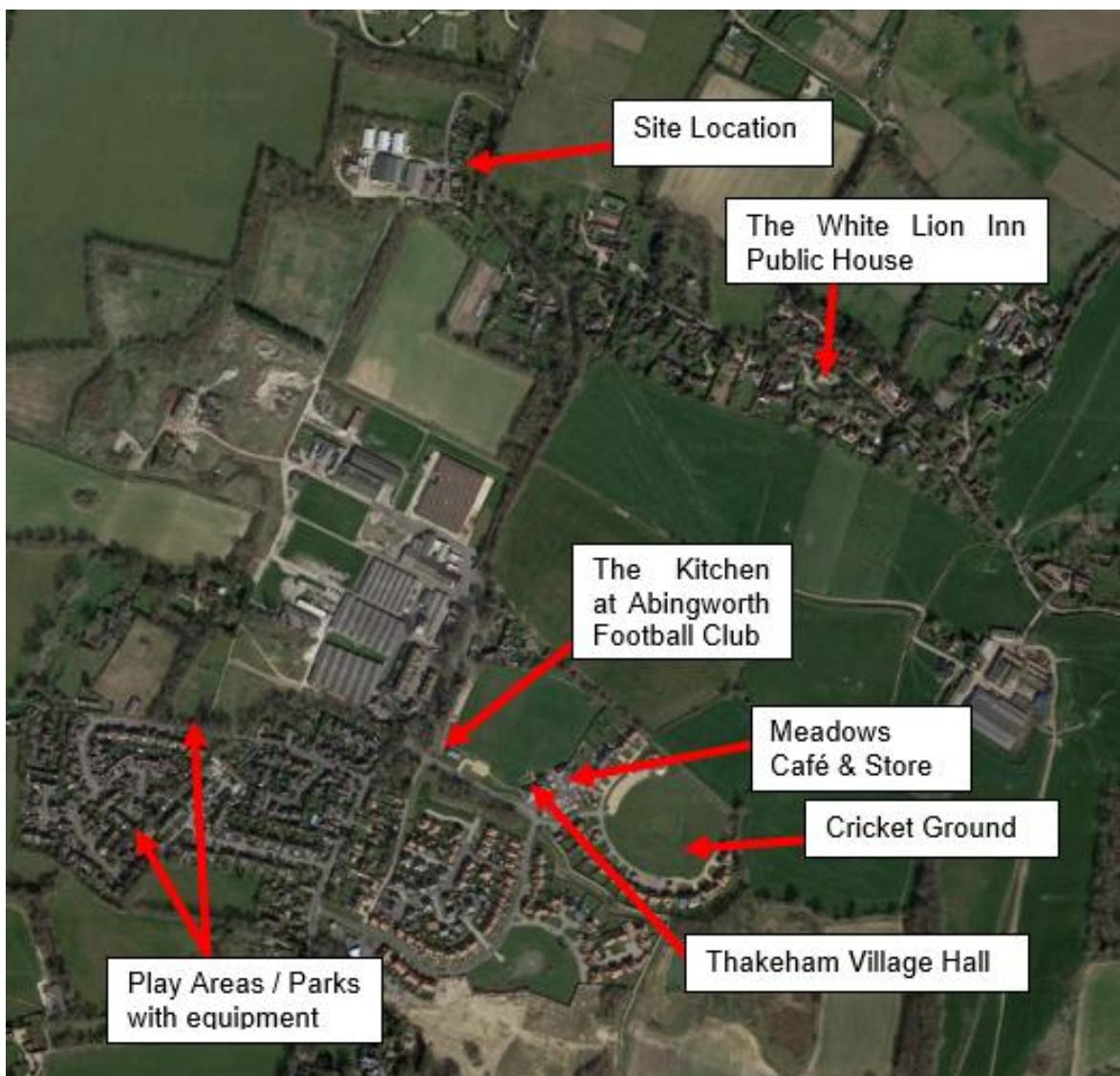


Figure 7 - Local Facilities

- 2.11. The site is additionally serviced by a number of Public Rights of Way (PROWs) which provides future occupants with easy walkable access to the above facilities.



Figure 8 - West Sussex County Council Public Rights of Way Map

- 2.12. As confirmed by the below Figures, Footpath Reference 2474 is hard standing for the entire length and is therefore suitable for buggies and wheelchairs.



Figure 9 - Photograph 1 of Footpath Reference 2474



Figure 10 - Photograph 2 of Footpath Reference 2474

- 2.13. It should be noted that an additional footpath is situated towards the end of Footpath 2474 which runs to the east, providing pedestrian connectivity to Storrington Road. Although it is noted that this is not identified as an official PROW on the WSCC maps, the path is hard standing (as evidenced in the below photographs) and connects to a pedestrian crossing on Storrington Road, which provides easy access to the new Abingworth site and facilities such as the Kitchen at Abingworth Football Club, Meadows Café & Store, the Cricket Ground and Thakeham Village Hall.
- 2.14. It is therefore clear that this is also an alternative, suitable and permanent footpath for future residents to use to access the facilities in Thakeham.

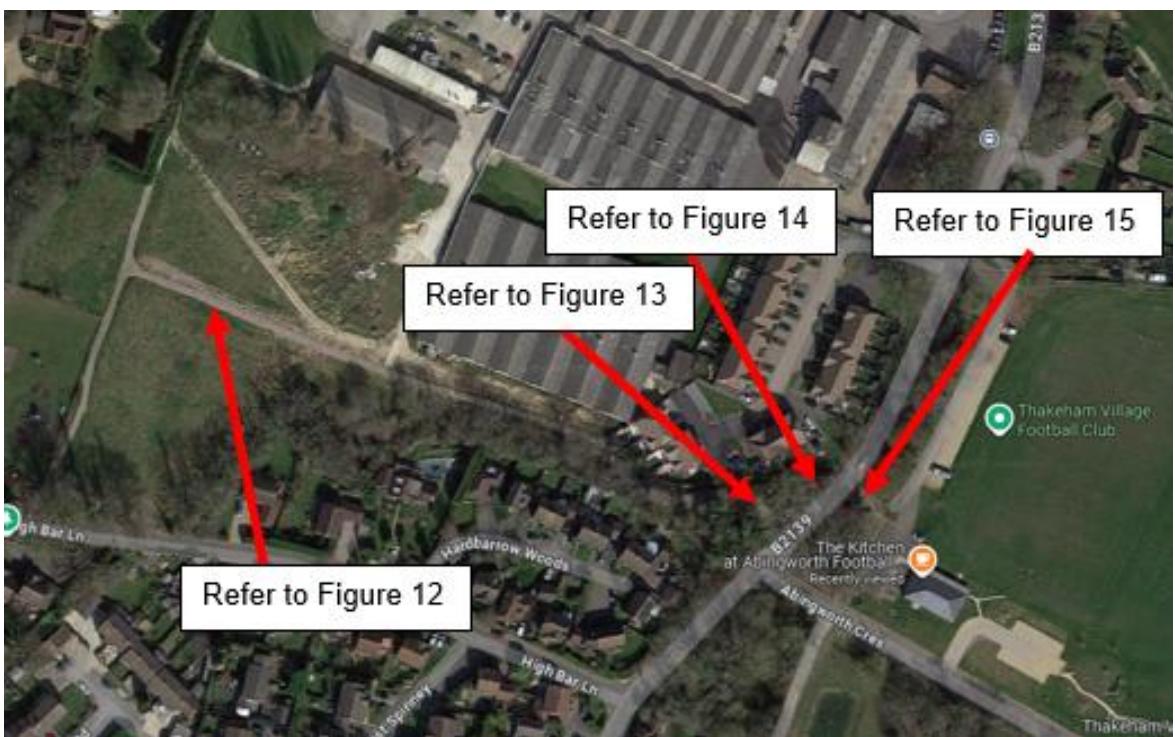


Figure 11 - Footpath to the South of Footpath Reference 2474



Figure 12 - Additional Southern Footpath Connecting to Storrington Road



Figure 13 - Path Leading from Footpath Reference 2474 to Western Side of Storrington Road



Figure 14 - Pedestrian Crossing on Western Side of Storrington Road



Figure 15 - Pedestrian Crossing on Eastern Side of Storrington Road

- 2.15. In addition to the above, two bus stops are located to the north of the site on Duke's Hill, providing sustainable transportation to nearby villages and wider Town's such as Horsham. These bus stops can be reached via the access road off Duke's Hill as illustrated below and would not require pedestrians to walk along Duke's Hill.



Figure 16 - Nearby Bus Stops

- 2.16. The Government's Flood Maps for Planning have been reviewed and reveal that the site is within Flood Zone 1 which means it has a low probability of flooding. Refer to Map below.

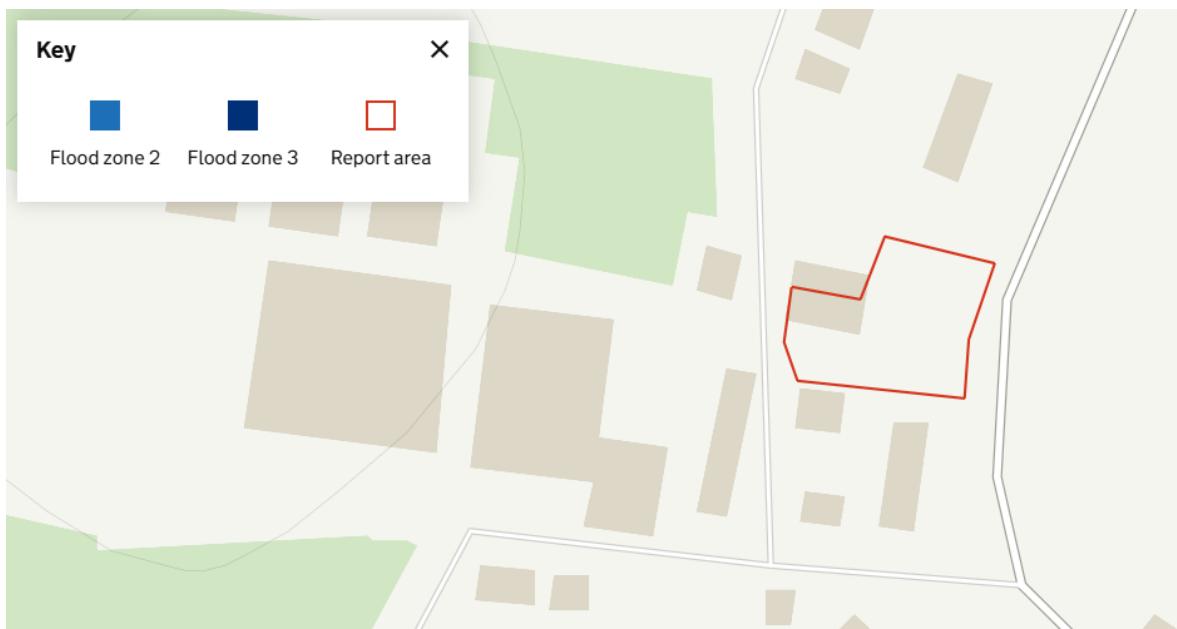


Figure 17 - Government's Flood Maps for Planning

- 2.17. In terms of surface water drainage, the site is not subject to any surface water flooding in any event (1 in 30 to 1 in 1000). Refer to Map below.

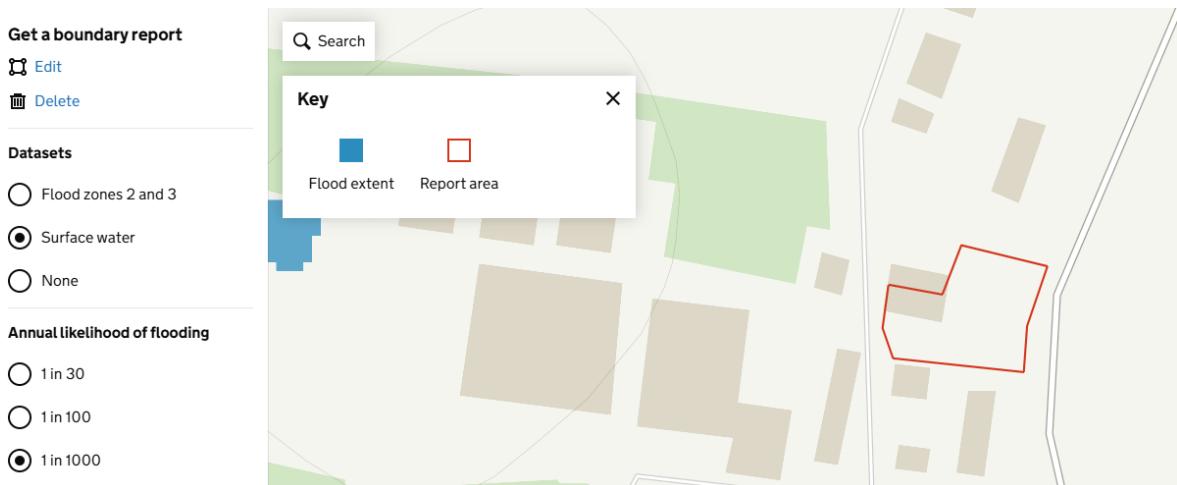


Figure 18 - Government's Flood Maps for Planning - Surface Water Drainage

3. Planning History

3.1. A review of the Horsham District Council online register reveals the following relevant planning history pertaining to the site and immediate area.

3.2. The Site's Planning History

3.2.1. **Reference PE/24/0227. Demolition of Existing Storage Unit and erection of 3no. dwellings (1no. detached and 2no. semi-detached dwellings), associated private gardens, parking and landscaping. Dated January 2025.**

3.2.2. The Council noted that the site lies outside the defined Built-Up Area Boundary (BUAB) and within the countryside, where new residential development is typically more limited under Policies 3, 4 and 26 of the Horsham District Planning Framework (HDPF) and Policy 1 of the Thakeham Neighbourhood Plan. Although the site is not currently allocated for housing within the adopted or emerging Local Plan and does not directly adjoin a settlement boundary, the Council acknowledged the existing pattern of nearby built form and the site's potential to be viewed as a small-scale infill opportunity.

3.2.3. Given the Council's housing land supply shortfall (2.9 years at the time the pre-application response was prepared), officers recognised that applications outside defined boundaries may be considered in the context of the tilted balance. It was advised that a suitably justified scheme demonstrating clear planning benefits or exceptional circumstances could therefore be viewed more favourably.

3.2.4. In design terms, officers considered the architectural approach and materials generally sympathetic to the rural context but raised concern that three dwellings would appear cramped and could result in landscape harm given the site's topography and boundary vegetation. The Council suggested that reducing the scale of development or omitting one dwelling could improve visual impact and garden sizes.

3.2.5. No major amenity conflicts with neighbouring properties were identified, although the private amenity space for future occupiers was limited. The site's proximity to commercial uses would require assessment of potential impacts.

3.2.6. An Arboricultural Survey was recommended to assess the condition and retention of mature trees on site. Highways access and parking provision were considered acceptable in principle, subject to demonstrating appropriate turning space.

3.2.7. The pre-application response noted that a Water Neutrality Statement and likely off-site mitigation would be required however this is no longer a requirement, as discussed later in this Statement.

3.2.8. In addition, a minimum 10% Biodiversity Net Gain would need to be demonstrated in line with the Environment Act 2021.

3.2.9. Overall, the Council concluded that the principle of development was not supported under current policy but acknowledged that the proposal could be viewed more favourably - particularly in the context of housing supply - if the quantum/proposals were reduced in scale and supported by evidence of previously developed land status, water neutrality, and biodiversity mitigation.

3.2.10. The pre-application scheme can be seen overleaf:



Figure 19 - Pre-Application Indicative Site Layout (Reference PE/24/0227)

3.3. Townhouse Farm Planning History

- 3.3.1. As set out below, the wider area of Townhouse Farm has been subject to extensive planning history for the conversion of buildings to residential. The principle of residential development in this location has therefore clearly been established.
- 3.3.2. **Reference DC/20/1711. Demolition of existing commercial storage buildings and erection of two 2-bed semi-detached dwellings. Permitted 17 December 2020.**
- 3.3.3. The above application was permitted following Prior Approval consent under reference DC/19/0685 for change of use of the buildings to 4no. residential homes (see below). The above application has been subject to minor changes via S73 applications but has been implemented and is now fully occupied.
- 3.3.4. **Reference DC/19/0685. Prior Approval for a change of use from storage (Class B8) to dwellinghouse (Class C3). Permitted 19 May 2019.**
- 3.3.5. **Reference DC/14/1652. Change of use of farm office building to provide a 1 bedroom single storey residence (Prior Notification). Permitted 26 September 2014.**
- 3.3.6. **Reference T/54/02. Change of use of land to residential and erection of a garage. 4 Townhouse Cottages. Permitted 23 October 2002.**

4. The Proposal

- 4.1. The proposals seek to demolish the existing storage unit and erect 2no. dwellings with associated private garden space, car parking and landscaping. The proposed Site Plan can be seen below.



Figure 20 - Proposed Site Plan

- 4.2. The proposed dwellings would comprise of 2no. detached 3-bedroom dwellings of circa 123sqm, which would comply and exceed with Nationally Described Space Standards. The dwellings have been designed to achieve the optional M4(2) standard of Part M of the Building Regulations, with approaches, pathways, and gradients designed to provide accessible and adaptable homes.
- 4.3. The proposed dwellings would be two storeys in height and would accommodate similar ridge heights to neighbouring properties, as illustrated below. Due to the sloping nature of the site, Plot 1 sits slightly higher than Plot 2. Their rear garden accesses are arranged separately, allowing the garden levels to follow the natural slope of the site.



Figure 21 - Proposed Sections

- 4.4. A car port per dwelling, capable of accommodating 2no. cars per dwelling, are proposed to the front (west) of the proposed dwellings, as illustrated in the below Figure. The car ports would be of a traditional design, including pitched roofs.



Figure 22 - Proposed Sections including Car Ports

- 4.5. Vehicular access to the site would be achieved via Duke's Hill, via existing access. The visibility splays associated with this access are considered to be entirely acceptable and already serve a number of residential units.
- 4.6. The proposed dwellings would benefit from generous gardens to the rear of the properties (east). The existing hedgerow to the east falls outside of the Applicant's ownership boundary and therefore would be retained, providing existing and natural boundary treatment for the dwellings. Site boundaries are to be reinforced with new hedgerow and tree planting to further screen the development from adjoining properties. Further boundary treatment in the form of fences/enclosures would be determined at a later stage and subject to condition.
- 4.7. As set out in the accompanying Design & Access Statement (DAS), it is envisioned that a low-level post and rail fence with soft landscaping is proposed behind the car ports to establish a secure yet visually permeable boundary between public and private space. Refer to the DAS for further information.
- 4.8. Sufficient space is available within the Plots for cycle storage (in sheds) and hardstanding areas to store bins. Further details would be subject to condition.
- 4.9. In terms of materials, the proposals seek to accommodate clay red hanging tiles, half hipped roofs, white windows, a red facing brick and black rainwater goods.
- 4.10. In terms of drainage, the proposed application is supported by a Drainage Report which has been prepared by Motion. The report identifies that the proposals seek to accommodate composite permeable paving in the parking areas and geocellular soakaways in the rear gardens.
- 4.11. Refer to the accompanying DAS and plans for further information.

5. Policy Overview

5.1. Introduction

- 5.1.1. At the heart of the planning framework are Statutory Development plans, which seek to guide the decision-making process. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires, that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.1.2. In this case, the relevant Development Plan comprises the Horsham District Planning Framework (2015).
- 5.1.3. The National Planning Policy Framework (The Framework), the Planning Practice Guidance (PPG) and Supplementary Planning Guidance are material considerations, together with local guidance documents.
- 5.1.4. It should be noted that the adopted Horsham District Planning Framework is currently out of date by reason of it being over 5 years old. The Government require all Local Authorities to review the Local Plan every five years and therefore the Council are currently in the midst of preparing a new Local Plan for the District. Please refer to the below paragraph for further information.

5.2. Emerging Horsham District Local Plan 2023 – 2040 (Regulation 19 Version)

- 5.2.1. The Regulation 19 Local Plan was published for a six week period of representation from 19 January 2024 to 1 March 2024. The Regulation 19 Local Plan was then formally submitted to the Planning Inspectorate on 26 July 2024 and the examination hearings commenced in December 2024.
- 5.2.2. At the time of writing this Statement, the Local Plan hearings have been cancelled by the Inspector due to '*significant concerns about the soundness and legal compliance of the Plan in respect of a number of areas*'.
- 5.2.3. On 7 April 2025, a Letter was published by the Inspector which recommended to Horsham that the Local Plan should be withdrawn from examination and a new Local Plan should be prepared.
- 5.2.4. We understand that Horsham are in the midst of responding to this Letter but as it currently stands, the Regulation 19 version of the Local Plan is shortly to be withdrawn and cannot be considered to hold any weight in the determination of this application.

5.3. National Planning Policy Framework (NPPF)

- 5.3.1. The NPPF was adopted in 2012 with many revised versions, the most recent of which being updated in February 2025. The NPPF sets out the Government's planning policies for England and how these should be applied. The relevant sections of the NPPF in relation to this application are summarised below and explored in further detail later in this Statement.
 - Chapter 2 (Achieving Sustainable Development)
 - Chapter 5 (Delivering a Sufficient Supply of Homes)
 - Chapter 9 (Promoting Sustainable Transport)
 - Chapter 11 (Making Effective use of Land)
 - 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)

5.4. Planning Practice Guidance (PPG)

- 5.4.1. The PPG was published by the Government in March 2014 and is updated regularly. The PPG supplement those overarching objectives of The Framework. The guidance provided by the PPG has been fully considered in the creation of this application and the proposals are seen to be fully compliant with it.

5.5. Strategic Planning Policy – Horsham District Planning Framework (2015)

- 5.5.1. The Horsham District Planning Framework (HDPF) was adopted in November 2015 and is the overarching planning document for Horsham District outside the South Downs National Park (SDNP) and replaces the Core Strategy and General Development Control Policies documents which were adopted in 2007.
- 5.5.2. Although the HDPF is out of date by reason of it being over 5 years old, the following policies are considered to be relevant to the application and have been given full consideration in the preparation of this application, as explored in further detail later in this Statement.
- 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 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 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 39 - Strategic Policy: Infrastructure Provision
 - Policy 40 - Sustainable Transport
 - Policy 41 - Parking

5.6. Shaping Development in Horsham District

- 5.6.1. The Council has produced the Shaping Development in Horsham District (SDPAN) document which is a material consideration in planning applications. The document sets out the Council's aspirations and the weight that can be given to current policy within the context of current legislation, national policy and guidance. The SDPAN document was endorsed at Cabinet on 17 September 2025 and has been reviewed in detail in the preparation of this application, as discussed in Section 6.

5.7. Thakeham Neighbourhood Plan (2017)

- 5.7.1. The Thakeham Neighbourhood Plan (TNP) was made by HDC on 26 April 2017 and contains policies, community aims, proposals and allocations which will influence and manage development within Thakeham.
- 5.7.2. It should be noted that the TNP is over five years old and not protected under the measures of the NPPF (as discussed in further detail later in this Statement). The TNP is therefore not considered to hold much weight in the determination of applications. Regardless, the following policies within the TNP are considered to be

relevant to the application and have been reviewed in the preparation of the application, but have not been afforded much weight as they are considered to be out of date.

- **Thakeham1 – A Spatial Plan for the Parish**
- **Thakeham6 – Design**
- **Thakeham10 - Green Infrastructure and Valued Landscapes**

5.8. Community Infrastructure Levy (CIL)

- 5.8.1. CIL was adopted by HDC in October 2017 and is a charge placed on new residential development and 'large format' retail development (A1 to A5).
- 5.8.2. The site falls within Zone 1 and therefore, in accordance with Horsham's CIL rate calculations table, new residential development is charged at £184.56 per sqm for 2025. This will be subject to change in accordance with the appropriate index figure which is amended in January every year.

6. Planning Appraisal

6.1. Introduction

6.1.1. The principal issues in relation to this development are as follows:

- **Principle of Development**
- **Design, Form and Appearance**
- **Residential Amenity**
- **Access, Transport and Parking**
- **Ecology and Biodiversity Net Gain**
- **Trees and Landscaping**
- **Drainage**

6.2. Principle of Development

6.2.1. The proposed development seeks full planning permission for the demolition of the existing storage unit and the erection of 2no. detached dwellings together with associated private gardens, parking, and landscaping. The existing building is a utilitarian storage structure of no architectural or heritage merit and its removal would provide an opportunity to make more efficient use of the land.

6.2.2. The site is located on land west of Coolham Road, which currently forms part of Townhouse Farm and includes land temporarily licensed to No. 2 Townhouse Cottages for use as additional garden space. The site is situated outside the defined Built-Up Area Boundary (BUAB) of Thakeham and is therefore designated as countryside for planning policy purposes.

6.2.3. In policy terms, the proposal must be considered against Policies 3 (Development Hierarchy), 4 (Settlement Expansion) and 26 (Countryside Protection) of the Horsham District Planning Framework (HDPF, 2015), as well as Policy 1 of the Thakeham Neighbourhood Plan (2017). These policies collectively seek to focus new development within settlement boundaries and resist inappropriate forms of development in the countryside unless a specific policy justification exists.

6.2.4. It is acknowledged that, in purely spatial terms, the proposal would represent development outside of the BUAB and therefore a departure from the adopted HDPF and Neighbourhood Plan. However, the weight that can be attributed to these policies is significantly reduced given that:

- The HDPF is now over five years old,
- Horsham District Council (HDC) cannot currently demonstrate a five-year supply of deliverable housing sites, with the latest monitoring report identifying only a 1-year supply, and
- The Thakeham Neighbourhood Plan is also more than five years old and does not benefit from the protection afforded under paragraph 14 of the NPPF.

6.2.5. As such, Paragraph 11(d) of the NPPF (2023) is engaged. This establishes the “tilted balance”, requiring that planning permission should be granted unless:

“i. The application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusal; or

“ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.”

- 6.2.6. The NPPF further clarifies that policies are considered out-of-date where the local planning authority cannot demonstrate a five-year housing land supply. As such, the presumption in favour of sustainable development applies to this proposal on the basis that HDC can only demonstrate a 1-year supply of housing.
- 6.2.7. It is also material that the Government has recently increased the national housing target from 300,000 to 370,000 new homes per year, with higher growth directed towards areas experiencing the greatest affordability pressures and development capacity. Horsham, as part of the wider Gatwick Diamond area with strong market demand and high affordability constraints, is likely to fall within this higher-growth category. The delivery of two additional dwellings on underused land in this location would therefore directly support national objectives for increasing housing supply.
- 6.2.8. The emerging Horsham District Local Plan (HDLP 2024-2040) is currently under preparation however, following the cancellation of the examination hearings by the Inspector, the emerging policies presently carry limited weight and it is anticipated that the Plan will shortly be withdrawn. The emerging plan is therefore not considered to carry any weight at this moment in time.
- 6.2.9. Since the earlier pre-application advice (ref: PE/24/0227), HDC has replaced its Facilitating Appropriate Development (FAD) document with the Shaping Development in Horsham District Planning Advice Note (SDPAN, 2024). The SDPAN acknowledges the District's continuing housing shortfall and provides updated guidance on how proposals outside of built-up area boundaries will be assessed, encouraging appropriately located, small-scale and sustainable housing schemes where these contribute positively to local character and housing delivery.
- 6.2.10. The current proposal responds positively to this updated policy context. The quantum of development has been reduced from three dwellings to two detached homes, thereby ensuring a lower-density, more contextually appropriate form of development that better respects the semi-rural character of the site and its surroundings. The scheme will deliver a modest but valuable contribution to local housing supply while removing a redundant and unattractive storage building.
- 6.2.11. Although the site is located outside the BUAB, it benefits from good accessibility to services and facilities within Thakeham. Established footpaths provide safe pedestrian access to the village centre, and bus stops are located immediately outside the site on Coolham Road, offering connections to nearby settlements (as set out in detail earlier in this Statement). The site is therefore not isolated and future residents would have realistic opportunities to use sustainable modes of travel, in accordance with paragraph 129(c) of the NPPF.
- 6.2.12. A further material consideration relevant to the assessment of this proposal is the recent appeal decision at Abbots Leigh, Washington Road, Storrington (Ref: APP/Z3825/W/25/3363148) appended to this Statement. Although the appeal was ultimately dismissed, the Inspector's findings are instructive and carry weight given the similarities in policy context and the District's continued housing shortfall. Importantly, the sole reason for dismissal related to the inability of the appellant to secure water neutrality mitigation, an issue which is no longer applicable to this application following the lifting of Natural England's position on water neutrality in the Sussex North Supply Zone. The Inspector concluded that, absent this issue, the proposal benefitted from a range of positive attributes despite being located outside the Built-Up Area Boundary.
- 6.2.13. Of particular relevance is the Inspector's assessment that development outside a settlement boundary can nevertheless represent a sustainable and acceptable location for new housing where it is well contained, does not result in harmful sprawl or settlement coalescence, has access to nearby services, and contributes positively to addressing the district's acute housing undersupply. The Inspector confirmed that a site's position outside the BUAB is not determinative where policies restricting housing supply are out-of-date, noting that such proposals can perform well against the Framework's sustainability objectives and provide an important boost to housing delivery. These conclusions directly support the principle of development in this case, where the site is similarly physically contained, accessible, and capable of delivering modest but valuable housing in a district with only a 1-year housing land supply.
- 6.2.14. To summarise, while the proposal represents development outside the defined settlement boundary, the relevant local policies are out-of-date due to the lack of a five-year housing land supply. The tilted balance in paragraph 11(d) of the NPPF is therefore engaged. The development would:

- Replace an existing storage unit of limited value with two high-quality dwellings;
- Make efficient and appropriate use of previously developed land; and
- Contribute positively to local housing delivery in a sustainable and accessible location.

6.2.15. Accordingly, it is considered that the adverse impacts of granting permission would not significantly or demonstrably outweigh the benefits. The principle of residential development on this site is therefore considered acceptable.

6.3. Design, Form and Appearance

- 6.3.1. Policies 25 (The Natural Environment and Landscape Character), 32 (The Quality of New Development), and 33 (Development Principles) of the Horsham District Planning Framework (HDPF, 2015) collectively require that new development protects, conserves and enhances the landscape and townscape character of the District. These policies emphasise that proposals must be of a high quality of design, should relate sympathetically to their context, and should make a positive contribution to local character and sense of place.
- 6.3.2. The proposed scheme has been carefully designed to respond to the site's semi-rural character, its relationship with Coolham Road, and the established pattern of development in the surrounding area. The revised proposal has reduced the quantum of development from three dwellings to two, thereby addressing the Council's previous concerns regarding overdevelopment and potential landscape harm. This reduction allows for a more spacious layout, improved landscaping, and greater retention of existing boundary vegetation.
- 6.3.3. The proposed dwellings are two-storey detached houses of approximately 123sqm each, designed with traditional proportions and domestic scale reflective of nearby dwellings along Coolham Road and within the Townhouse Farm cluster. The ridge and eaves heights have been informed by surrounding built form and are broadly consistent with neighbouring properties, ensuring that the dwellings sit comfortably within the established roofscape and do not appear dominant when viewed from the public realm.
- 6.3.4. Given the natural slope of the site, Plot 1 is positioned slightly higher than Plot 2. The buildings are stepped sympathetically with the existing landform to minimise visual intrusion, and the garden levels follow the natural gradient of the land. This approach reduces the need for significant cut and fill operations and helps integrate the development more harmoniously into its landscape setting.
- 6.3.5. The dwellings are orientated to front onto the shared access, creating an attractive and legible frontage. The layout allows for meaningful separation between the two homes and their side boundaries, thereby avoiding the cramped appearance identified in the earlier pre-application feedback. The resulting spacing between the dwellings ensures the scheme reads as two individually designed rural dwellings, rather than a consolidated or suburban form of development.
- 6.3.6. The proposed dwellings adopt a vernacular rural design, drawing upon materials and detailing characteristic of the surrounding countryside and nearby properties. The design incorporates half-hipped clay tiled roofs, red multi-stock brickwork, and clay hanging tiles to upper elevations, complemented by white-framed windows and black rainwater goods. These materials are locally distinctive and will ensure that the development sits comfortably within its rural setting.
- 6.3.7. The proportions, fenestration, and roof forms are consistent with the traditional character of existing dwellings to the north and south. Architectural detailing has been kept simple and robust, providing a timeless and durable appearance while avoiding unnecessary pastiche. The inclusion of car ports with pitched roofs contributes to a coherent visual rhythm across the frontage and reinforces the rural domestic character.
- 6.3.8. The use of high-quality and natural materials will be secured by condition, ensuring a high standard of finish consistent with the expectations of HDPF Policies 32 and 33.

- 6.3.9. The scheme has been landscape-led, with careful consideration given to the site's edge-of-settlement character. The existing mature hedgerows and trees along the eastern and southern boundaries will be retained wherever possible, providing immediate visual containment and softening views of the new dwellings from Coolham Road and the wider countryside. Additional native planting and hedgerow reinforcement are proposed to strengthen boundary definition and enhance biodiversity value.
- 6.3.10. The reduction in unit numbers from three to two allows for enhanced landscape buffers and increased green space around the dwellings, reducing built form intensity and maintaining the verdant character of the site. The proposal will therefore preserve the rural transition between built development and open countryside, in accordance with Policy 25 of the HDPF.
- 6.3.11. Given the existing topography and the screening provided by vegetation, the proposed dwellings will be visually unobtrusive in wider landscape views. The development will not break the skyline or appear prominent from Coolham Road, and any limited glimpses will reveal dwellings of appropriate scale and high-quality design, consistent with local distinctiveness.
- 6.3.12. Overall, the proposed dwellings represent a high-quality, contextually appropriate and landscape-led design which responds positively to the feedback received at pre-application stage. The revised two-dwelling scheme achieves an appropriate balance between efficient use of land and protection of local character. Accordingly, the proposed development accords with Policies 25, 32 and 33 of the Horsham District Planning Framework and with the relevant design objectives of the National Planning Policy Framework (NPPF).

6.4. Residential Amenity

- 6.4.1. Policy 33 (Development Principles) of the HDPF requires that new development should be designed to ensure it does not cause unacceptable harm to the amenity of existing or future occupiers of land and buildings, having particular regard to issues of privacy, outlook, daylight, and noise. Developments should also provide an appropriate standard of amenity for future occupants.
- 6.4.2. The proposed development has been designed to ensure that it will not result in any unacceptable impacts on the residential amenity of existing neighbouring properties. The nearest residential dwellings are No. 2 and No. 3 Townhouse Cottages, located immediately to the north of the application site. The proposed dwellings would be sited approximately 8.4m from No. 3 Townhouse Cottages and 13.6m from No. 2 Townhouse Cottages, as shown below. These separation distances are an improvement from the pre-application scheme and are consistent with those found within the surrounding area. The distances are sufficient to prevent any loss of privacy, outlook, or light to neighbouring occupiers.



Figure 23 - Proposed Separation Distances

- 6.4.3. The existing outbuilding associated with No. 3 Townhouse Cottages, located adjacent to the northern boundary, is a single-storey ancillary structure of limited height and use, with no windows on the northern elevation.. Given its scale and relationship to the proposed dwellings, there would be no undue impact on its function or the residential amenity of No. 3 Townhouse Cottages.
- 6.4.4. The proposed dwellings are orientated and positioned carefully to avoid direct overlooking or inter-looking between existing and proposed habitable room windows. No side windows are proposed. The overall arrangement ensures that the development would not result in any unacceptable perception of overlooking or overbearing impact on adjacent dwellings, in accordance with Policy 33 of the HDPF.
- 6.4.5. Each of the proposed dwellings would benefit from generous private garden areas to the rear, providing a high-quality external amenity space proportionate to the size of the homes. The reduction in unit numbers from three dwellings to two directly responds to the Council's pre-application feedback, allowing for larger garden spaces, enhanced separation between buildings, and greater opportunities for soft landscaping. The resulting plots now provide a comfortable balance between built form and open space, ensuring an appropriate standard of amenity for future residents.
- 6.4.6. Internally, both dwellings have been designed to exceed the Nationally Described Space Standards and achieve the optional M4(2) accessibility standard, providing functional, adaptable and comfortable living environments for future occupants. Adequate space is provided within each plot for cycle and refuse storage, with clear and convenient access to the highway.

- 6.4.7. The site lies adjacent to Townhouse Farm and some commercial/agricultural activity occurs in the wider area. However, the storage building currently occupying the application site provides a level of separation between the existing commercial uses and nearby residential properties. The proposed removal of the storage building and replacement with residential dwellings will not introduce any new sources of noise or disturbance.
- 6.4.8. In summary, the proposals therefore fully accord with Policy 33 of the HDPF and the relevant provisions of the NPPF, which seek to ensure that new development secures a good standard of amenity for all existing and future occupants.

6.5. Access, Transport and Parking

- 6.5.1. Policies 40 (Sustainable Transport) and 41 (Parking) of the HDPF require that development provides safe and suitable access for all users, promotes sustainable transport choices, and ensures adequate parking provision that meets the needs of anticipated users. These policies align with the objectives of Section 9 (Promoting Sustainable Transport) of the NPPF, which emphasises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.
- 6.5.2. The site is located in a reasonably sustainable and accessible location on Coolham Road, within convenient walking distance of local services and facilities in Thakeham. The site benefits from established pedestrian footpaths connecting to the village, local schools, and bus stops located immediately adjacent to the site on Coolham Road. These bus services provide regular connections to Storrington, Billingshurst, Pulborough, and Horsham, thereby reducing the need for reliance on the private car. Refer to Appendix C for the bus schedule which further demonstrates the regular bus services provided.
- 6.5.3. The proximity of sustainable transport options, alongside the availability of safe pedestrian routes, ensures that future occupiers will have realistic alternatives to private car use, consistent with the sustainable transport objectives of Policy 40 of the HDPF and the NPPF.
- 6.5.4. Vehicular access to the site will be achieved via the existing access from Duke's Hill, which currently serves several existing residential dwellings. The access benefits from good visibility splays in both directions, and no alterations are required to accommodate the modest increase in vehicle movements associated with two additional dwellings.
- 6.5.5. Since the pre-application stage, the site layout has been significantly amended to simplify the internal access arrangement. The previous proposal for an internal access road has been removed, with parking now positioned directly off the existing access road. This revised layout represents a more efficient and safer design, reducing internal vehicle manoeuvring, improving visibility for both drivers and pedestrians, and making better use of available space. The access geometry and alignment have been reviewed and confirmed as suitable for the expected traffic volumes.
- 6.5.6. Given the small scale of the scheme, comprising only two dwellings, the development will not generate a material increase in vehicle movements, and therefore no adverse highway safety impacts are anticipated. In accordance with paragraph 116 of the NPPF, the residual cumulative impacts of the development on the highway network would be negligible and clearly not "severe."
- 6.5.7. Policy 41 of the HDPF and the West Sussex County Council (WSCC) Guidance on Parking at New Developments (2020) require that parking is provided in accordance with the size, type and location of the dwellings. The site falls within Parking Zone 1, where the requirement for a 3-bedroom dwelling is approximately 2.2 spaces per unit.
- 6.5.8. Each proposed dwelling is provided with at least two dedicated parking spaces located within car ports positioned conveniently to the front of each plot. A further two parking spaces per dwelling could be provided outside of the car ports if necessary. The layout therefore accords with WSCC's adopted standards.

- 6.5.9. Provision has also been made for electric vehicle (EV) charging points within each car port in accordance with Building Regulations, promoting low-emission travel and future-proofing the development. Secure cycle storage is also provided within each plot to encourage active travel choices and can be secured by condition.
- 6.5.10. In summary, the proposed development provides a safe, efficient and sustainable access arrangement, with parking provision fully compliant with local and national policy. Accordingly, the proposals are fully compliant with Policies 40 and 41 of the Horsham District Planning Framework and the relevant provisions of Section 9 of the NPPF, ensuring that the development can be safely and suitably accessed by all users.

6.6. Ecology and Biodiversity Net Gain

- 6.6.1. An Ecological Appraisal and a Biodiversity Gain Statement (including Metric) have been prepared by Essential Ecology in support of this application.
- 6.6.2. The following conclusion is provided in the Ecological Appraisal:

"8.1.1 Essential Ecology has undertaken an Ecological Appraisal of the site based on the results of a desktop study, extended UK Habitat Survey and habitat suitability assessments for protected species, particularly including Badger, bats, Great Crested Newts and nesting birds. Specific emergence survey work has also been undertaken in respect of roosting bats and building B1.

8.1.2 The implementation of recommended mitigation measures will ensure the ecological value of the site and protected species are safeguarded. A number of enhancement measures could also be implemented to provide an ecological betterment over the existing situation in line with local and national planning policy.

8.1.3 On this basis, the proposed development is not considered likely to result in significant adverse impacts to biodiversity at the site or in the local vicinity either alone or in combination with other projects."

- 6.6.3. In terms of BNG, the accompanying Report concludes that *"the development of the site will result in a net loss of habitat and therefore, additional habitat units will likely need to be acquired from a habitat bank in order for the pre-commencement biodiversity gain condition to be discharged."* Where possible, the off-site credits will be sought as close as possible to the site.
- 6.6.4. To conclude, the proposals are considered to be entirely acceptable with regards to ecology and BNG. Further information can be secured by condition.

6.7. Trees and Landscaping

- 6.7.1. This application is supported by an Arboricultural Impact Assessment & Method Statement, a Tree Retention and Protection Plan and an Existing Tree Schedule which has been prepared by Lizard Landscape Design and Ecology.
- 6.7.2. The following conclusion is provided in the AIA:

*"Over all impacts relating to tree and hedgerow removals is considered to be **low**, and impacts from any tree surgery are also considered **low**. It should be noted that the vast majority of potential impacts to trees around the boundary of the site are associated with the new landscaping. Regarding the 2no proposed plots, with the removal of 2no mature Ash it achieves **minimal** possible RPA incursions.*

Provided that mitigation planting is in line with current guidelines and all other protection measures are properly enacted, the loss of trees from the site would be adequately compensated and the proposals would accord with the requirements of BS5837.

The protection, compensation and enhancement detailed herein have been designed to ensure the ongoing favourable status of retained trees and vegetation, and the species which use these. Additionally, adherence to the methods detailed will ensure that all works accord with the relevant wildlife legislation and planning conditions.”

- 6.7.3. To conclude, the proposals are considered to be entirely acceptable in terms of arboriculture.

6.8. Drainage

- 6.8.1. Policy 38 (Flooding) of the HDPF seeks to ensure that development does not increase the risk of flooding elsewhere and incorporates appropriate measures for the management of surface water and foul drainage. This is consistent with the requirements of Section 14 (Meeting the Challenge of Climate Change, Flooding and Coastal Change) of the NPPF which requires new development to be planned to avoid flood risk and to manage surface water sustainably.
- 6.8.2. A Drainage Strategy prepared by Motion supports this application. In summary, the Strategy identifies that the site lies entirely within Flood Zone 1 and is at very low risk of surface water flooding, making it suitable for residential development in accordance with Policy 38 of the Horsham District Planning Framework (HDPF) and Section 14 of the NPPF.
- 6.8.3. The proposed drainage strategy follows the drainage hierarchy and SuDS principles, incorporating permeable paving within parking areas and geocellular soakaways in the rear gardens to manage surface water on site. The system has been hydraulically modelled to accommodate the 1 in 100-year storm event plus 45% climate change allowance without flooding, and includes measures for pollution control and long-term maintenance.
- 6.8.4. Foul water will connect to the existing public sewer in Duke's Hill, which has sufficient capacity to accommodate the development.
- 6.8.5. The report concludes that the proposals will not increase flood risk on or off site and that both foul and surface water can be managed sustainably and effectively. Any remaining details, such as final soakage testing, can be secured by planning condition.
- 6.8.6. Accordingly, the proposals accord with Policy 38 of the HDPF and the relevant provisions of the NPPF.

7. Conclusion

7.1. This Planning Statement including Energy and Sustainability Statement has been produced by ECE Planning on behalf of our client, Fowlers Land and New Homes in support of a Planning Application for development at Land adjoining No. 2 and No. 3 Townhouse Cottages, Coolham Road, Thakeham ('the Site'). The description of the proposal reads:

"Demolition of Existing Storage Unit and erection of 2no. detached dwellings, associated private gardens, parking and landscaping."

7.2. This application follows pre-application discussions with Horsham District Council (HDC) under reference PE/24/0227 for the *"Demolition of Existing Storage Unit and erection of 3no. dwellings (1no. detached and 2no. semi-detached dwellings), associated private gardens, parking and landscaping."* Following feedback received from HDC, the quantum of development has been reduced from 3no. dwellings to 2no. dwellings.

7.3. This Planning Statement has demonstrated that the proposed development represents a sustainable and high-quality form of development that accords with national and local planning objectives. This conclusion is reinforced by the recent Abbots Leigh appeal decision, where the Inspector confirmed that small-scale, sustainably located housing outside the Built-Up Area Boundary can be acceptable in principle in the context of Horsham's acute housing shortfall, with the only reason for dismissal in that case relating solely to water neutrality, a constraint that no longer applies to this proposal.

7.4. While the site lies outside the defined Built-Up Area Boundary of Thakeham and therefore constitutes a departure from the Horsham District Planning Framework (HDPF) and the Thakeham Neighbourhood Plan, both plans are now more than five years old and the Council is unable to demonstrate a five-year supply of deliverable housing sites. Accordingly, the presumption in favour of sustainable development, as set out under paragraph 11(d) of the National Planning Policy Framework (NPPF), is engaged.

7.5. The proposal delivers a number of clear and demonstrable benefits, including:

- The removal of an unattractive and redundant storage structure of no architectural or heritage merit;
- The efficient and sensitive redevelopment of underused land in a sustainable and accessible location;
- The provision of two high-quality, family-sized homes that will make a modest but valuable contribution to local housing supply;
- A design and layout that responds positively to the site's semi-rural context, respecting the established pattern of development and enhancing local character; and
- New landscaping and biodiversity enhancements that will deliver ecological net benefits and reinforce the site's green, rural character.

7.6. The technical assessments accompanying this application confirm that the development is acceptable in all other respects:

- Design and appearance: The dwellings are of an appropriate scale, massing, and vernacular design that reflects local distinctiveness, in accordance with Policies 25, 32, and 33 of the HDPF.
- Residential amenity: The scheme ensures suitable separation from neighbouring dwellings and provides high-quality internal and external living environments, in full compliance with Policy 33.

- Access and parking: The proposal utilises an existing safe access, provides parking in line with adopted standards, and offers convenient access to sustainable transport options, consistent with Policies 40 and 41 of the HDPF.
- Ecology and biodiversity: The proposals will safeguard protected species and provide ecological enhancement in line with national and local policy.
- Trees and landscaping: The arboricultural assessment concludes that impacts are low and that proposed mitigation and new planting will adequately compensate for any loss, ensuring compliance with BS5837.
- Drainage: The site lies within Flood Zone 1, and the proposed SuDS-based strategy demonstrates that surface and foul water can be managed sustainably on site, in accordance with Policy 38 of the HDPF.

- 7.7. Taken as a whole, the benefits of the proposal clearly outweigh any limited harm arising from its location outside the Built-Up Area Boundary. The development represents a logical and proportionate form of small-scale growth that aligns with the aims of the NPPF to significantly boost the supply of homes, make efficient use of land, and deliver well-designed, sustainable places.
- 7.8. Accordingly, it is concluded that the proposal constitutes sustainable development for the purposes of the NPPF. In the absence of any adverse impacts which would significantly and demonstrably outweigh the benefits, planning permission should therefore be granted.

Appendix A – Pre-Application Response for Reference PE/24/0227 Dated January 2025

Dear Chris Barker,

Location:

Townhouse Farm
Coolham Road
Thakeham
West Sussex
BN11 2EN

Details:

[PE/24/0227]

Demolition of Existing Storage Unit and erection of 3no. dwellings (1no. detached and 2no. semi-detached dwellings), associated private gardens, parking and landscaping.

Thank you for your enquiry in respect of the above and my apologies for the delay in replying. I can advise as follows: -

Principle of development

The application site is situated outside of the defined built up area in a countryside location and no other statutory designations. The site is within a rural area characterised by farms, commercial uses and individually designed dwellings. The site is located on the west side of Coolham Road. Access currently exists to the site via a private access from Coolham Road which is shared with the existing Townhouse Farm

The application site lies in the countryside outside of the identified built-up area of any settlement. Given this location, the initial principle of the proposal must be considered in the context of Policies 3, 4, and 26 of the Horsham District Planning Framework (HDPF) and Policy 1 of the Thakeham Neighbourhood Plan. Given that the application is outside of the built up area boundary, and is not allocated for housing it would be contrary to policies 3,4 and 26 of the HDPF.

The emerging Horsham District Local Plan (HDLP) is currently being prepared and sets out emerging planning policies and proposals to guide development in the District (excluding the South Downs National Park) up to 2040. The emerging local plan previously only held limited weight in regards to its policies, however the examinations of the plan were recently cancelled by the Inspector. Until the council received further instruction the policies within the plan only hold limited weight. The application site is not allocated for housing within the emerging local plan, such that it would represent conflict with the emerging HDLP and has not been allocated within the Thakeham Neighbourhood plan.

Strategic Policy 2 of the HDLP promotes a similar development hierarchy and permission of development within the defined BUAB as in Policy 3 of the HDPF and states that any infilling and redevelopment would be required to demonstrate that it is of an appropriate nature and scale to maintain the characteristics and function of the settlement in accordance with the settlement hierarchy.

The Council cannot currently demonstrate a 5-year housing land supply (the Council's latest Authority Monitoring Report shows a 2.9 year supply). In recognition of these HDPF housing policies being out-of-date, the Council has published interim guidance on how housing proposals are to be considered in its Facilitating Appropriate Development (FAD) document. The FAD recognises that the Council is likely to receive applications outside of defined BUAB and on unallocated sites (such as this proposal) given its housing land supply position. The

FAD confirms that applications which meet all the following criteria will be positively considered:

- The site adjoins the existing settlement edge as defined by the BUAB;
- The level of expansion is appropriate to the scale and function of the settlement the proposal relates to;
- The proposal demonstrates that it meets local housing needs or will assist the retention and enhancement of community facilities and services;
- The impact of the development individually or cumulatively does not prejudice comprehensive long-term development; and

The application site does not adjoin the settlement edge of Thakeham such that it would not be in accordance with the FAD. The proposal therefore would not be acceptable in principle. Without exceptional circumstances to balance this conflict with the HDPF and HDLP, the proposal would be refused if it were submitted in its current format.

Design/ Landscape Impact

Policy 32 and 33 of the HDPF seeks to ensure that development promotes a high standard and quality of design in order to enhance and protect locally distinctive characters. The policies also seek to ensure that the scale, massing and appearance of development relates sympathetically with the built surroundings, landscape, open spaces and routes within and adjoining the site, including any impact on the skyline and important views.

Strategic Policies 19 and 20 of the emerging HDLP require high-quality, beautiful and inclusive design which conserves and enhances the natural and built environment, and reflects the local, physical, social, economic, environmental and policy context. In particular, Strategic Policies 19 and 20 support development which, *inter alia*, is: attractive, functional, safe and adaptable; complements and respond to locally distinctive characters; contributes to a sense of place; makes efficient use of land; provides a good standard of amenity for existing and future occupants; is of a sympathetic scale, massing and appearance; uses high standards of building materials and landscaping; allows sufficient space for general waste and recycling provision; and makes a clear distinction between public and private spaces.

The current application site is being used as residential land by the adjoining neighbouring property. The proposed design takes cues from the neighbouring properties to the south and north, in terms of hanging tiles, half hipped roofs and scale which would generally be considered to be appropriate for this countryside setting. Nevertheless, given the topography of the application site which rises steeply from the main road to the application site and currently benefits from mature hedging and trees, there is concern that there would be some landscape harm arising from the proposal such that a slight reduction in the scale of the dwellings may allow for additional retention of the trees and hedges in this location. A reduction in scale to the dwellings would provide additional benefit/ or of removal of one unit so as to not appear as tightly fitting within the plots and would allow a more reasonable residential curtilage which currently would be very minimal. No elevations have been submitted for the neighbouring dwellings such that it is not possible to compare the eaves and ridge heights of the proposed dwellings which would be helpful in the event of a full submission. The design of the dwellings would be acceptable, however the form the three dwellings take cumulatively would result in a cramped form of development and a simple improvement to the visual appearance of the site would be to remove one of the dwellings such that the landscaping along the main road can be preserved and that would allow an improved garden space for future occupiers.

Amenity

Policy 33 of the HDPF states that development should consider the scale, massing and orientation between buildings, respecting the amenities and sensitivities of neighbouring properties.

As discussed during the pre-app meeting, the proposed development is unlikely to result in an unacceptable relationship in terms of loss of outlook, obtrusive appearance or loss of light to the neighbouring dwellings. Furthermore and discussed in the above section of this report, the amenity space for the future occupiers would be limited and the removal of one dwelling would be considered to allow a more reasonable garden space that would be anticipated for three bedroom homes of this size. There would be a degree of mutual overlooking between the three dwellings and the existing buildings garden spaces, however no direct overlooking into habitable rooms would occur as a result of the development.

Overall, the residential amenity space for the future occupiers could be improved, however the proposal would not be sufficiently harmful to warrant a refusal. As per the discussion in the pre-application meeting, given the sites location next to agricultural buildings/commercial units, the development would need to demonstrate that there would be no contaminated soil or potential for harm due to unacceptable levels of noise.

Trees

Policy 33 of the HDPF states that development should presume in favour of the retention of existing important landscape and natural features, for example trees, hedges, banks, and watercourses. Development must relate sympathetically to the local landscape and justify and mitigate against any losses that may occur through the development. Policy 31 of the HDPF states that where felling of protected trees is necessary, replacement planting with a suitable species would be required.

There are trees within the application site that appeared from the site visit to be mature such that it is recommended than an Arboricultural survey is undertaken in the event of a full application.

Highways Impact

Policy 40 of the HDPF supports proposals which provide safe and suitable access for all vehicles, pedestrians, cyclists, horse riders, public transport and the delivery of goods, whilst Policy 41 requires adequate parking facilities within developments.

The turning spaces would need to be demonstrated to evidence that vehicles can access the parking spaces outlined. The dwellings are proposed to be served by two spaces each which would be considered sufficient, however WSCC have their own pre-application advice service available if the applicant would like to enquire as to the acceptability of future plans.

Water Neutrality

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.

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.

No information has been submitted in respect of Water Neutrality. It is advised that the applicant go to the Horsham District council website for guidance on how to prepare a Water Neutrality statement. The current application site would likely be considered to have a nil baseline and there does not appear to be sufficient space within the site to allow for mitigation measures that would be entirely on site. Additional offsite mitigation is therefore likely required.

Further information can be found at:

<https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district/water-neutrality-and-planning-applications>

The applicant requested to know if the proposal would be eligible to enter into the council's SNOWs scheme. To be eligible for this, the development would have to be within an allocated site for housing and not exceed 85 litres per person per day in water usage. The proposal is not therefore eligible for SNOWs.

Biodiversity Net Gain

Biodiversity Net Gain (BNG) is an approach introduced under the Environment Act 2021, to ensure that developments and land management leave the natural environment in a better state than it was before. It contributes towards nature recovery by helping to deliver habitat creation and enhancements as part of the design of new development.

There is now a statutory requirement to provide a minimum of 10% BNG on development sites. Further information can be found at: -

<https://www.horsham.gov.uk/planning/planning-applications/biodiversity-net-gain>

Summary

The proposed development would not be acceptable in principle given its conflict with policy 26 of the HDPF. It would not be acceptable under the FAD given the proposal would not adjoin a BUAB and has not been allocated within the neighbourhood plan or the emerging local plan.

Whilst the principle of development would be unacceptable with regards to Policy 26 of the HDPF, the councils housing shortage is noted and the application would be decided in light of the tilted balance. It is further acknowledged that the context of the site would be an infill in built form and viewed within the context of a cluster of existing built form where the land may be seen as previously developed land. The developer would need to demonstrate that the land has been previously developed to be considered as such and as per the comments above, the application may be viewed more favourably with the removal of one of the dwellings given the cramped layout currently proposed.

Should an application be submitted, the following information would be required:

- Location Plan
- Block Plan
- Proposed Floor and Elevation Plans
- Planning Statement
- BNG Statement and Metric
- Preliminary Ecological Survey
- Arboricultural Impact Assessment
- Tree Survey

- Plan to demonstrate Vehicle turning

I hope this is of some assistance. The above comments are given as the opinion of the Case Officer and do not prejudice any outcome of a subsequent application. Should you submit a formal planning application, please quote reference number PE/24/0227 in your submission.

Hannah Darley
Senior Planning Officer

Appendix B – Appeal decision at Abbots Leigh, Washington Road, Storrington (Ref: APP/Z3825/W/25/3363148)



Appeal Decision

Site visit made on 22 September 2025

by **C Walker BA (Hons) DipTP MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 06 October 2025

Appeal Ref: APP/Z3825/W/25/3363148

Abbots Leigh, Washington Road, Storrington, West Sussex RH20 4AF

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant outline planning permission.
- The appeal is made by Mr David King against the decision of Horsham District Council.
- The application Ref is DC/24/1965.
- The development proposed is described as 'outline planning application with all matters reserved apart from access for 1no. 4-bedroom dwelling with associated private garden space, car parking and landscaping'.

Decision

1. The appeal is dismissed.

Preliminary Matters

2. The appeal scheme relates to an outline proposal, with all matters, other than the means of access, reserved for future consideration. I have dealt with the appeal on that basis.
3. A plan has been submitted which indicates how residential development could be accommodated on the site along with indicative elevation and floor plans. Aside from the means of access, I have taken these into account for indicative purposes only.
4. My attention is drawn to an emerging Draft Local Plan submitted under Regulation 19¹. Evidence indicates there is considerable doubt that this plan will proceed, following a recommendation from the examining Inspector that it should be withdrawn and a new plan prepared. Both parties agree it attracts limited weight and in any event, I have not been provided with relevant policies so I have not had regard to it.
5. The site lies close to the South Downs National Park (NP). The duty to conserve and enhance the natural beauty and special qualities of the NP extends to consideration of its setting. However, this is not a matter in dispute between the parties, and I am satisfied that the duty would be met. Therefore, I do not deal with the matter any further.
6. An Aboricultural Appeal Statement dated 21 March 2025 by PJC Consultancy Ltd accompanied the appeal. The Council has commented on it as part of their statement of case. It indicates that, subject to conditions, this has overcome its second refusal reason. From the evidence before me, I have no reason to disagree. Therefore, it is not necessary for me to consider the matter further.

¹ of the Town and Country Planning (Local Planning) (England) Regulations 2012

7. The appeal site falls within the Sussex North Water Supply Zone (SNWSZ) as defined by Natural England, where water abstraction has the potential to adversely affect the Arun Valley Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site (hereafter the Arun Valley sites). It is a European Designated Site afforded protection under the Conservation of Habitats and Species Regulations 2017 as amended (the Habitats Regulations). Although not forming part of the Council's reason for refusal, as competent authority I must consider whether the development is likely to have a significant effect on the integrity of the site. It is therefore necessary to consider this as a main issue. The main parties have had the opportunity of commenting on this.
8. A Unilateral Undertaking (UU) has been submitted with this appeal to secure the development as a self-build dwelling, and includes mitigation relating to water neutrality, a matter I return to in my reasoning below. The Council has had the opportunity to comment on this, so is not prejudiced by my acceptance of it.

Main Issues

9. In light of the above, the main issues are:

- whether the appeal site is a suitable location for the development, having particular regard to relevant provisions of the development plan and the Framework; and
- the effect of the development on the integrity of the Arun Valley sites.

Reasons

Whether suitable location

10. The appeal site relates to part of the garden serving Abbots Leigh, located on Washington Road within the parish of Storrington and Sullington. It lies outside of the settlement boundary, in the open countryside as defined in the Horsham District Planning Framework (adopted 2015) (the HDPF) and the Storrington, Sullington and Washington Neighbourhood Plan 2018-2031 (made 2019) (the NP).
11. A strategic approach to development is set out in HDPF Policy 2 which focuses development in and around the key settlement of Horsham, which sits at the top of the district's settlement hierarchy. Storrington and Sullington fall into the second tier of the hierarchy, 'Smaller Towns and Larger Villages' Settlement Type under HDPF Policy 3. These settlements are stated as having a good range of services and facilities, strong community networks and local employment provision, together with reasonable public transport options. The settlements act as hubs for smaller villages, but also have some reliance on larger settlements / each other to meet some of their requirements. HDPF Policy 3 and NP Policy 1, support development within the built-up area boundaries (BUAB's), on allocated sites or in accordance with other development plan policies for the location of development in the countryside.
12. HDPF Policy 4 states that outside of BUABs, the expansion of settlements will be supported where the site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge, where the level of expansion is appropriate to the scale and function of the settlement type. In addition, the development must be demonstrated to meet the identified local housing needs or assist the retention and enhancement of community facilities and avoid prejudice

to comprehensive long-term development. The final criterion is that the development should be within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced.

13. While the proposal for one dwelling would be appropriate for the scale and function of the settlement type, the site is not allocated, nor does it adjoin an existing settlement edge. Given the Council's inability to meet its five-year housing land supply (5YHLS), the proposal would help to address an unmet housing need and would not prejudice long-term development. The appeal proposal would be well contained by the existing dwelling of Abbots Leigh and Sandgate Lodge on its opposite side, as well as the designated Sandgate Country Park to its north, which limits its sprawl into the rural area and thus meets the final criterion.
14. However, as the appeal site does not adjoin a settlement edge, nor is it allocated for residential development in the Local Plan or NP, it does not comply with the first part of criterion 1 to HDPF Policy 4. As a result, the proposal is contrary to this policy.
15. Policy 26 of the HDPF seeks to protect the countryside from inappropriate development, requiring development outside of BUAB's to be essential to its countryside location and to meet one of 4 listed exceptions. This proposal would not meet any of these exceptions, bringing the scheme into conflict with this policy.
16. In light of the above, the appeal site is not a suitable location for the development, having regard to the relevant provisions of the development plan and the Framework. The appeal scheme runs counter to policies 1, 2, 3, 4 and 26 of the HDPF and NP Policy 1, which amongst other matters, seek to achieve sustainable development.

Integrity of the Arun Valley sites including Appropriate Assessment

17. The Arun Valley sites are low lying wetland areas that support rare and diverse plants, invertebrate and bird assemblages as qualifying features. Variation in soils and water supply lead to a wide range of ecological conditions and rich flora and fauna. Natural England issued a Position Statement in September 2021 which advised that due to the additional demand for water abstraction, it cannot be concluded with the required degree of certainty that new development in the SNWSZ would not have an adverse effect on the integrity of the site. The proposal would create a net gain of one dwelling, and in combination with other development permitted in the area, there would be a likely significant adverse effect on the Arun Valley sites.
18. The Position Statement sets out an interim approach requiring plans and projects, affecting sites where an existing adverse impact is known, to demonstrate certainty that they will not contribute further to the existing adverse impact. Regulation 75 of the Habitats Regulations requires an Appropriate Assessment to be carried out to demonstrate the required water neutrality.
19. Natural England sets out the definition for water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place. Water neutrality can be achieved through a combination of water efficiency measures in new buildings and water offsetting.

20. The submitted Water Neutrality Statement sets out proposed on-site water reduction measures, such as fixtures and fittings to be used in the development. Measures would also be required to off-set the residual demand and both parties agree that the purchasing of off-site credits would be an acceptable approach to mitigation. I have no reason to disagree with the views of the Council and Natural England that the strategy advanced would achieve water neutrality, subject to securing the mitigation.
21. Concerns have been raised that the submitted UU only ties the appellant to purchase off-setting credits and does not obligate the land-owners, or other interested parties, to undertake the necessary water off-setting works. The appellants evidence contends that the submitted UU is appropriate to secure mitigation on the basis that the appellant has signed contractual terms with the off-setting provider and paid a substantial deposit. However, evidence of this contractual arrangement has not been provided. Furthermore, the water off-setting provider is not a signatory to the UU. Consequently, I have no certainty that the mitigation necessary to avoid the development from having an adverse effect on the integrity of the Arun Valley sites would be secured.
22. The appellant contends the UU meets the tests of the Framework and cites an example of another scheme where water neutrality was secured by a UU to illustrate their point. However, in that case the water off-setting land was shown edged red and appended as a supplementary deed to the UU, which is not the case in the appeal before me. Consequently, it does not alter my findings on the matter.
23. As competent authority, taking the precautionary principle, I therefore find that the development would likely have a significant adverse effect on the integrity of the protected sites and therefore does not accord with the Habitats Regulations. This also runs counter to the expectations of HDPF Policy 31.

Other Matters

24. As a result of the Council being unable to demonstrate a 5YHLS, it published a document 'Facilitating Appropriate Development' in October 2022 (FAD). This alters the way in which HDPF Policy 4 should be applied. The FAD removes the need for a site to be allocated within the HDPF or NP to be considered acceptable in principle. While the FAD retains the need to demonstrate how the proposal will meet local needs, and to comply with the other remaining criteria to Policy 4, I have found above that the proposal would help to address the undersupply of housing identified in the district and would comply with the other criteria, with the exception of adjoining a BUAB, which the appeal site does not do.
25. However, the FAD, alongside the Framework seeks to promote sustainable development in rural areas and prevent isolated homes in the countryside. As the site sits amongst a small cluster of other dwellings, some of which are on the opposite side of the road, it would not be physically isolated in this respect. Outside of the appeal site, on the opposite side of Washington Road, a footpath provides pedestrian access to the heart of the settlement which the appellant indicates is approximately 0.9 miles away, with the edge of the settlement closer.
26. Additionally, my attention has been drawn to several bus stops in the vicinity of the site. In particular, the bus stop said to be 187m to the east is accessible by footpath and is within a reasonable walking distance from the appeal site. Limited

details have been provided on the frequency of buses, albeit it provides public transport to other settlements in the wider area, as expected given its position in the settlement hierarchy. Consequently, occupiers of the site would have a choice of transport that would not rely solely on use of the private car.

27. Developing the site does not risk merging the settlements owing to its highly constrained positioning between dwellings and the designated Sandgate Park site behind. It would make effective use of land that is not of a high environmental value in line with HDPF Policy 2 and perform well against the objectives of maintaining the district's unique character. Moreover, given its relatively close proximity to a range of services and facilities, the material considerations indicate that the location of development is acceptable, notwithstanding the conflict with the development plan.
28. While there are likely to be other areas of previously developed land (PDL) outside of BUAB's, based on the individual merits of the scheme, it is unlikely that another site would display exactly the same circumstances and it would be unlikely to set an unwelcome precedent.
29. In support of the Council's case, three appeal decisions for single dwellings in the countryside have been cited. Unlike the appeal before me, the appeal dismissed at Lancasters Cottage, Partridge Green², would have resulted in a new home isolated from any settlement. The other two appeals had other harms identified which required balancing. All of these decisions were made when the supply of housing deliverable housing exceeds its current position. For these reasons, based on the limited information before me, they are not directly comparable and do not alter my findings on this matter.

Planning Balance

30. The necessary 5YHLS cannot be demonstrated. There is agreement that the Council is currently only able to demonstrate a 1.0 year supply of deliverable housing sites³, representing a significant shortfall. An inability to demonstrate a 5YHLS warrants the application of paragraph 11(d) of the Framework. In accordance with paragraph 11(d)(i), I have already established that there is a strong reason for refusal with regards to a habitats site. The presumption in favour of development does not therefore apply.
31. I have found that locationally, the site runs contrary to the spatial strategy of the development plan. However, in circumstances where the Council's housing delivery policies have acted to unduly restrict the supply of homes, I do not find the site's position outside of the settlement boundary, and thus at odds with the Council's spatial strategy, to be decisive to the outcome of this appeal. Rather, when considered in the round, the site is PDL and located where occupants would be able to access local services and facilities and help support them by means other than reliance solely on the private car. This along with the small but important boost in housing supply, and the temporary construction jobs it would create, weighs heavily in favour of the scheme.
32. However, as I have set out, the effect of the development on the integrity of the Arun Valley sites is a strong reason for refusal to which I attach substantial weight.

² Appeal Ref: 3297418 – dismissed March 2023

³ based on the Housing Delivery Test Action Plan, April 2025

This aligns with the thrust of paragraph 193 of the Framework and brings it into conflict with the development plan as a whole. Although there are weighty material considerations, they would not outweigh the conflict with the development plan.

Conclusion

33. For the reasons set out above, the appeal should be dismissed.

C Walker

INSPECTOR

Appendix C – Compass Travel Bus Schedule

74: Storrington - West Chiltington - Barns Green - Horsham

74A: Storrington - Thakeham - Barns Green - Horsham

74B: Storrington - Thakeham - Shipley - Maplehurst - Horsham

includes 64 journeys from Loxwood to Coolham, Barns Green and Horsham

74
74A
74B

Operates on days shown

	M-F 74A	Tue 74	Tue 74	Tue 74	Thu 74B	M Th 64	Thu 74A	Thu 74A
Storrington , Bus Stand	0643	0935	1212	1340	0935		1219	1347
Thakeham, The Street	0649	▼	▼	▼	0941		1225	1353
W.Chiltington Common, C'nds	▼	0941	1218	1346	▼		▼	▼
W.Chiltington, Queens Head	▼	0944	1221	1349	▼		▼	▼
Danhill, Crossroads	0651	0950	1227	1355	0943		1227	1355
Shipley Village	▼	▼	▼	▼	0948		▼	▼
Buckbarn Crossroads	▼	▼	▼	▼	0953		▼	▼
Maplehurst, White Horse	▼	▼	▼	▼	0959		▼	▼
Nuthurst, Black Horse	▼	▼	▼	▼	1003		▼	▼
Coolham, Crossroads	0654	0953	1230	1358	▼	1115	1230	1358
Brooks Green	0657	0956	1233	1401	▼	1118	1233	1401
Barns Green, The Hordens	0701	1000	1237	1405	▼	1122	1237	1405
Barns Green, Recreation Grnd	0702	1002	1239	1407	▼	1124	1239	1407
Christs Hospital, Bluecoat Pond	0708	1008	1245	1413	▼	1130	1245	1413
Horsham , Bus Stn, Bay A (arr)	0714	1016	1253	1421	1016	▼	1253	1421
Horsham , Bus Stn, Bay A (dep)		1020	1255	1425	1020	1138		
Horsham, Carfax		1022	1257	1427	1022	1140		

	Tue 74	Tue 74	Tue 74	Thu 74A	Thu 74B	M Th 64	Thu 74A	Sch 74A	M-F 74A
Horsham , Bus Station, Bay A (dep)	1020	1255	1425	1020	1255	1325	1425		1635
Horsham, Carfax	1022	1257	1427	1022	1257	1327	1427		1637
Horsham, Station	▼	▼	▼	▼	▼	▼	▼		1640
Horsham, Hospital	▼	▼	▼	▼	▼	▼	▼		1641
Christs Hospital, Bluecoat Pond	1032	1307	1437	1032	▼	1337	1437		1651
Barns Green, Recreation Ground	1038	1313	1443	1038	▼	1341	1443		1657
Barns Green, The Hordens	1040	1315	1445	1040	▼	1343	1445	▼	
Brooks Green	1044	1319	1449	1044	▼	1346	1449		1703
Coolham, Crossroads	1047	1322	1452	1047	▼	1350	1452		1706
Nuthurst, Black Horse	▼	▼	▼	▼	1307		▼		▼
Maplehurst, White Horse	▼	▼	▼	▼	1311		▼		▼
Buckbarn Crossroads	▼	▼	▼	▼	1317		▼		▼
Shipley Village	▼	▼	▼	▼	1322		▼		▼
Danhill, Crossroads	1050	1325	1455	1050	1327		1455		1709
W.Chiltington, Queens Head	1056	1331	1501	▼	▼		▼		▼
W.Chiltington Common, Crossroads	1059	1334	1504	▼	▼		▼		▼
Thakeham, The Street	▼	▼	▼	1052	1329		1457		1711
Thakeham, SGS Rock Rd, Grounds	▼	▼	▼	▼	▼		▼	1520C	▼
Storrington , Bus Stand	1105	1340	1510	1058	1335		1503	1530	1717
Rackham Street								1538	
Amberley Square								1542R	
Amberley Station								1546R	
Houghton, Houghton Lane								1548R	

C - Operates via Thakeham, Furze Common Road. This section to Thakeham carries school pupils only and not the public

M-F - Operates Mondays to Fridays

Mon - Operates Mondays only

Tue - Operates Tuesdays only

Thu - Operates Thursdays only

M Th - Operates Monday and Thursday only

Sch - Operates schooldays only

R - Request for passengers already onboard

