



HORSHAM DISTRICT COUNCIL CONSULTATION

TO:	Horsham District Council – Planning Dept
LOCATION:	Leonardslee Gardens, Brighton Road, Lower Beeding West Sussex
DESCRIPTION:	Extension to the visitor entrance building to house a new ticket sales area and café; Infilling roof to the former generator block courtyard, re-roofing of the Alpine House and internal/ external reconfigurations and link extension; Single storey winter garden conservatory to the Stable Block; Terrace extension to the east and internal/ external reconfigurations; Change of use from redundant staff offices and staff accommodation within the stable block to guest accommodation including extension to Honey Cottage; Change of use to the partial first floor of the Red House to staff accommodation; Small WC extension, reinstated chimney stack, and roof alterations to the Engine House; Lightweight wedding pavilion to the lawn, south of Leonardslee House; Landscaping changes including to the forecourt of Leonardslee House.
REFERENCE:	DC/25/1146
RECOMMENDATION:	Advice / No Objection / Objection / More Information / Modification / Refusal

SUMMARY OF COMMENTS & RECOMMENDATION:

The application is for various development works on a site with a number of environmental sensitivities, including the High Weal AONB, a Grade II Listed Building and Grade I Registered Parks and Gardens, set in the countryside.

The site is recognised in the Lower Beeding Neighbourhood Plan as an employment hub which has been key for local employment and tourism since reopening. The site's role and uses are considered to be essential to its countryside location. Development which supports and enhances the viability and future prospects of the house and gardens and the local and district economy while supporting and enhancing the sensitive local environmental context, would be considered appropriate.

The case officer should seek the views of specialists in relation to the highways, heritage and landscape impacts before assessing whether the development is acceptable and can be permitted.

MAIN COMMENTS:

Preamble:

The application is for a number of works including changes of use at Leonardslee Gardens, a site which sits in the countryside and on the western edge of the High Weald National Landscape (or Area of Outstanding Natural Beauty). Leonardslee Gardens is a Grade I Registered Park and Garden. Leonardslee House, which sits within the application site, is a Grade II listed building. A section of the site to the east is within designated Ancient Woodland.

Permission is being sought for the following:

- Extension to the visitor entrance building to house a new ticket sales area and café;
- Infilling roof to the former generator block courtyard, re-roofing of the Alpine House and internal/ external reconfigurations and link extension;
- Single storey winter garden conservatory to the Stable Block;
- Terrace extension to the east and internal/ external reconfigurations;
- Change of use from redundant staff offices and staff accommodation within the stable block to guest accommodation including extension to Honey Cottage;
- Change of use to the partial first floor of the Red House to staff accommodation;
- Small WC extension, reinstated chimney stack, and roof alterations to the Engine House;
- Lightweight wedding pavilion to the lawn, south of Leonardslee House;
- Landscaping changes including to the forecourt of Leonardslee House

Development Plan

The case officer will be aware that national policy and legislation identify that regard should be given to the development plan when determining planning applications.

In the case of this application, the development plan includes the Horsham District Development Framework (HDPF, 2015), the West Sussex Joint Minerals Local Plan (2018), the West Sussex Waste Local Plan (2014) and the Lower Beeding Neighbourhood Plan (LBNP, 2025). The respective Minerals and Waste Local Plans are not relevant in this case and therefore reference is only made to the HDPF and LNP.

The Shaping Development in Horsham District Planning Advice Note was endorsed by Cabinet on 17 September 2025. Among other things, it has identified that, notwithstanding the age of the HDPF, many of its policies remain consistent with the NPPF and that full weight should be applied to them. Taking this into account, I consider that the following policies are most relevant to this application and that full weight should be given.

Policies relating to economic development:

Policy 7 - Economic Growth supports sustainable economic development, including through redevelopment smart growth of existing employment sites and increasing the value of the tourism economy.

Policy 10 - Rural Economic Development sets expectations for rural economic development, including requiring proposals to maintain the quality and character of the area

in a way that is appropriate to the countryside location. Proposals should result in substantial environmental improvement, making use of existing buildings where possible and with development being expected to support sustainable economic growth. Car parking requirements should be accommodated on site where possible.

Policy 11 - Tourism and Cultural Facilities encourages measures which promote tourism and are of an appropriate scale to their location. It seeks to reinforce local distinctiveness, are in keeping with the relationship between urban and rural areas of the district, especially in and around the High Weald AONB.

Policy 20 - Rural Workers Accommodation supports accommodation for rural workers outside the BUAB where there is a need and where the use supports an established and viable business.

Policies relating to the natural and built environment

Policy 25 - District Character and the Natural Environment supports development which conserves and enhances landscape character, considering areas of landscape importance.

Policy 26 - Countryside Protection protects the area outside BUABs from inappropriate development. Proposals in the countryside must be essential to their countryside location as well as providing for quiet, informal recreation use and/or enabling the sustainable development of rural areas. Proposals must not lead to a significant increase in levels of activity in the countryside and should conserve or enhance key features of the landscape and its character.

Policy 30 - Protected Landscapes deals with proposals which impact or interact with the High Weald AONB. It makes clear proposals should promote opportunities for the understanding and enjoyment of the area's special qualities. Proposals should not lead to any adverse impacts on the High Weald, and should have regard to the relevant management plan (in this case, **High Weald AONB Management Plan 2024-2029**) demonstrating natural beauty will be conserved and enhanced, public enjoyment of the landscape is maintained and the economy and social wellbeing is supported.

Policy 31 - Green Infrastructure and Biodiversity seeks to maintain or enhance the network of green infrastructure across the District. Existing biodiversity should be enhanced.

Policy 32 - The Quality of New Development sets an expectation for high quality design, which demonstrates a clear understanding of the local, physical, economic and environmental context. Proposals should contribute to the locally distinctive character and to a sense of place, integrating with the historic landscape in which proposals sit.

Policy 33 - Development Principles requires proposals to avoid unacceptable harm to the amenity of nearby occupiers, to relate sympathetically with their surroundings and landscape.

Policy 34 - Heritage Assets and Managing Change within the Historic Environment seeks to sustain and enhance the historic environment, to reinforce the special character of the heritage environment, secure the future of assets and to retain and improve their setting.

Policy 40 – Sustainable Transport encourages proposals to contribute to a rebalancing of in favour of non-car modes of transport. Proposals which are appropriate in scale to the existing infrastructure but also offers a choice of modes, develops innovative approaches to public transport in rural areas and seeks to minimise the impact on the wider area will be supported. **Policy 41 – Parking** requires adequate parking facilities to meet the needs of users including motorcycles, EV charging and those with more complexed mobility needs.

LBNP was prepared by Lower Beeding Parish Council and was 'made' by Horsham District Council on 8 October 2025.

The LBNP recognises Leonardslee Gardens as a hub of employment and notes the positive impact the reopening of Leonardslee Gardens has had on local employment and tourism.

Policy 17: Existing Employment Sites and **Policy 18: Economic Growth** support proposals which maintain or expand existing sites, or for new employment uses, providing they are in keeping with the character of the area, avoid unacceptable harm to nearby amenity and do not have unacceptable highway impacts. The Travel Plan Statement sets out how sustainable transport modes will be encouraged, and how staff and visitors will be encouraged to minimise single occupancy vehicle use. The view of the highways authority should be sought in respect of impacts on the highway, noting that there are no changes to the existing access arrangements proposed.

The Plan seeks to maintain a balance which ensures business needs do not adversely affect residential amenity, to preserve and enhance the distinctive heritage and rural biodiversity of the Parish and to protect and enhance the high-quality landscape of the area. **Policy 2: Landscape Character** supports proposals which conserve and enhance the natural environment and landscape character of the Parish. This policy should be used by the case officer, taking advice landscape and heritage specialists, to assess the appropriateness of the proposal, given that it relates to heritage assets.

Horsham District Local Plan 2023-2040 (HDLP)

The Council has reviewed the HDPF and prepared the draft Horsham District Local Plan 2023-2040, which was submitted to the Secretary of State for formal examination in July 2024. The draft plan sets out planning policies and proposals intended to guide development in the district, excluding the South Downs National Park, up to 2040. Examination hearings began in December 2024, but the remaining hearings were cancelled by the Inspector in a Holding Letter dated 16 December 2024. On 22 April 2025 the Council published the Inspector's subsequent Interim Findings Letter, which recommended that the Plan be withdrawn on the basis of his view that the Council has failed to satisfactorily comply with the legal Duty to Cooperate.

In his Interim Findings letter, the Inspector has indicated that, in relation to its evidence base, "the Council could utilise much of the good and comprehensive work already undertaken" to commence work on a new local plan. There is, therefore, no reason to think that relevant sections of the local plan evidence base could not equally be used in determining planning applications.

Following its Communities and Place Policy and Scrutiny Committee on 23 July, and upon direction from members, and a subsequent Cabinet Member Decision taken on 8 August by the Cabinet Member for Planning and Infrastructure, the Council wrote to the Planning Inspector on 18 August 2025. The letter requested that he reopen the examination hearings to revisit his conclusions on the Duty to Cooperate and conduct a further hearing on the matter, to include representatives of neighbouring authorities with whom relevant Duty to Cooperate discussions took place. A response to the letter was received from the Inspector on 28 August 2028 inviting further evidence from the Council, which it is due to provide shortly.

It is the Council's view that the submission Horsham District Local Plan 2023-2040 remains the emerging Local Plan (eLP) in the context of NPPF para 49 at the time of writing. However, given the context described, it is considered that only limited weight can be given to its policies. Those of relevance are as follows:

Policy 13: The Natural Environment and Landscape Character, Policy 14 – Countryside Protection, Policy 16 – Protected Landscapes and Policy 17 – Green Infrastructure and Biodiversity relate to the how proposals will be expected to respond to their landscape context.

Policy 19 – Development Quality and Policy 20 – Development Principles set general expectations around the design and amenity considerations of development. This includes built form as well as how development interacts with its surroundings.

Policy 21 – Heritage Assets and Managing Change within the Historic Environment seeks to preserve and enhance the historic environment by encouraging applicants to demonstrate an understanding of an asset's significance and how the proposal makes a positive contribution to the character of the area.

Policy 30 – Enhancing Existing Employment, Policy 31 – Rural Economic Development and Strategic Policy 34 - Tourism Facilities and Visitor Accommodation are all relevant to development proposals involving economic development in rural locations. Redevelopment, enhancement and expansion of existing employment premises are supported providing they are of an appropriate scale. Development would be expected to maintain the quality and character of the rural area.

Policy 44 – Rural Workers Accommodation supports accommodation for rural workers outside the BUAB where there is a functional need and where the use supports an established and viable business.

Water Neutrality

The application is supported by a Water Neutrality Statement which has not be assessed as part of these comments. It is for the Case Officer to assess whether this provides due assurance that water neutrality will be achieved.

However, I draw attention to the recent Government announcement made on 8 October 2025 regarding new homes development and water neutrality which is found at:
<https://www.gov.uk/government/news/thousands-of-new-homes-get-the-go-ahead-in-north-sussex>

The Council's position is to assume that Natural England's Position Statement will change as a result of the Government announcement and, as a matter of due diligence, we are calling for full evidence to substantiate that new position, just as we did at the time water neutrality was first required by Natural England in 2021.

We will be able to advice prospective applicants further on water neutrality and water efficiency requirements in due course, following receipt and review of this evidence.

Conclusion

The site in question sits outside the built-up area and, therefore, in the countryside where development is usually resisted. The policies included in the various parts of the development plan set out above seek to maintain a balance between economic growth - in particular recognising the importance of rural businesses and rural tourism to Horsham District - and the protection of the countryside and its unique character. Proposals for economic development in the countryside must demonstrate they can be delivered sustainably and that they are of an appropriate scale for the area. Not only should harm on the local character and historic landscape be minimised, but applicants should demonstrate that a scheme contributes positively to the environmental context of the proposed development.

The site being considered as part of this proposal sits in a particularly sensitive context, with impacts on Ancient Woodland, the High Weald AONB, a Grade II listed building and its setting and a Grade I Registered Park and Garden all likely. The case officer should consider whether the protection and enhancement of the designated landscape and assets has been achieved by the proposal.

The applicant has set out in their submission that Leonardslee is an established business, having reopened to the public following its purchase by the current owners in 2017. The wider estate, with its woodland gardens, parkland and landscaping is appropriately set in the countryside and the wider setting of the AONB adds to its appeal as a tourist attraction. It plays an important role as a local employer as well as contributing to the District's rural economy. The development proposed is intended to increase the number of off-peak visitors and to more successfully manage the demand during peak periods. It seeks to maintain a more consistent flow of visitors in order to protect the gardens from the intensified use during large seasonal events, an approach which is supported by relevant policies.

The loss of rural workers accommodation has been justified by the applicant by the changes in working patterns and behaviours in recent years. Rather than seek to market this additional capacity the applicant proposes to maintain an element of staff accommodation and repurpose the additional capacity to provide visitor accommodation and other visitor facilities. If the case officer is content that there is sufficient evidence to justify the loss of staff office and accommodation space, then this approach too would be supported by policy.

The views of the Council's Conservation Officer, Landscape Officer, and Historic England, should be sought in relation to the impact the proposals would have on heritage assets and the historic environment and landscape, both directly and indirectly. This will enable the case officer to determine whether the benefits the proposals would have on the rural economic could be realised without unacceptable environmental impacts.

Similarly, while it is noted that there are no changes to existing access arrangements, and that the development is proposed with the aim of smoothing out visitor demand away from peak periods and large events, the highways authority view should be sought to allow the case officer to determine whether the policy requirements in respect of transport impacts of development in this location are met. The Travel Plan, outlining measures by which sustainable transport modes will be encouraged and single occupancy vehicle use will be minimised is welcomed.

Extent of policy comments

Comments are limited to key policies across the development plan, and have not necessarily considered the finer details of the proposal. Advice and views should be sought from specialist officers and bodies, particularly in relation to heritage, landscape and transport, and it is then for the case officer to assess the merits of the proposal against all relevant policies.

ANY RECOMMENDED CONDITIONS:

None at this stage.

NAME:	Julia Hayes
DEPARTMENT:	Planning Policy
DATE:	10/10/2025