



APPLICATIONS & APPEALS SERVICES

**DEMOLITION OF EXISTING BUILDINGS AND
ERECTION OF FOUR DWELLINGS WITH
ASSOCIATED GARAGES, ACCESS AND
LANDSCAPING**

**GREENACRES, SAUCELANDS LANE, SHIPLEY,
HORSHAM, WEST SUSSEX, RH13 8PU**

PLANNING STATEMENT

MAY 2025



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1.0 INTRODUCTION

1.1 Planning permission is sought for the demolition of existing storage buildings and the erection of four detached dwellings with associated access, garages and landscaping at Greenacres, Saucelands Lane, Horsham, West Sussex RH13 8PU.

1.2 This supporting Planning, Design and Access Statement sets out the detail of the proposal which is described and appraised having regard to the following aspects.

- **Physical Context** – explains the physical context of the site and its surroundings;
- **Planning Context** – relevant planning history of the site and broad policy requirements;
- **Use** – the purpose of the proposed development;
- **Amount** – the extent of development on the site;
- **Scale** – details of the physical size of the proposed development;
- **Layout** – the relationship of the proposed development to the site and its setting;

- **Appearance** – details of materials, style and impact upon the existing and neighbouring properties;
- **Landscape** – impact of the proposal on the existing landscape and proposed planting and surfacing;
- **Access** – access to the proposed development and associated parking.

1.3 The Statement will demonstrate that the proposed development accords with the relevant planning policies and is acceptable in all respects.

2.0 PHYSICAL CONTEXT

2.1 The application site measures approximately 0.65ha and is situated to the south side of Saucelands Lane, outside the Built-Up Area and in the countryside. The roughly L-shaped plot comprises a long drive leading south from the Lane. The site then opens out to the east at the developed southern section of the site. There are six single storey buildings used as commercial storage and offices (B1 and B8 use classes) with open storage bays, parking and hard standing areas.

2.2 The site is divided into three areas –

- the western yard with buildings and external storage bays arranged along the outer edges and hard surfacing throughout,
- an open area to the south of the above including hard surfaced parking area and a pond and
- the eastern yard comprising a storage barn with open areas for storage and other external operations.

2.3 The buildings are of varied design and materials and generally located to the west and south perimeter of the site, whilst the

storage bays are to the north and east of southern section of the site.



Figure 1 - Site location plan

2.4 The site boundaries are defined by mature trees and shrubs. Whilst mostly level, there are bunds to the rear of the open storage bays and to the south.

2.5 The surrounding area is rural in character with limited, small-scale development surrounded by open fields. There are open

fields around the site, and a public right of way (footpath) runs parallel to the west boundary of the site. The nearest development is at Fayreholme, a residential dwelling to the northeast.

2.6 The site is approximately 3.9km from the boundary of West Chiltington, a “Medium Village” to the southwest. It is within the Southern Low Weald Landscape Character Area.

2.7 The site is within Flood Zone 1, which the Environment Agency designates as a low risk of fluvial flooding. The site is also within the Sussex North Water Supply Zone.

2.8 The following are photographs and images of the application site:



Figure 2 - Entrance to site from Saucelands Lane © Google Maps



Figure 3 - View east along Saucelands Lane © Google Maps



Figure 4 – Existing site layout with buildings highlighted



Figure 6 - View south along access towards building 1

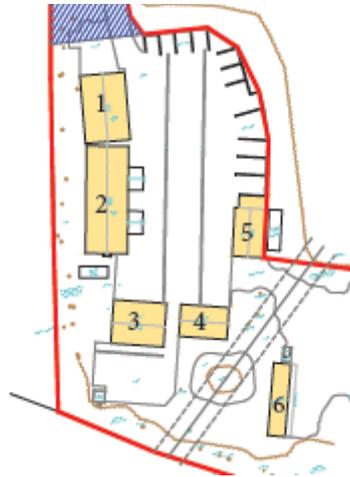


Figure 5 - Existing site layout - buildings numbered



Figure 7 – Entry into western yard from access



Figure 8 – Western yard parking and buildings



Figure 10 – Southern parking area (building 3)



Figure 9 – Western yard - external storage bays and buildings 4 and 5



Figure 11 - Pond and buildings 3 and 4 viewed from southern section of site



Figure 12 - External storage bays, building 5 and entrance to eastern yard



Figure 14 – South boundary of eastern yard, building 6 to right



Figure 13 - View to northwest from eastern yard

3.0 PROPOSAL

3.1 The application seeks planning permission for the demolition of the existing buildings and the erection of four detached dwellings. The development would provide the following:

- Plot 1 – two-storey dwelling providing three bedrooms with detached double car port
- Plot 2 – two-story dwelling providing three bedrooms with detached double car port
- Plot 3 – 1.5 storey providing four bedrooms with detached double car port
- Plot 4 – 1.5 storey providing four bedrooms with integral double car port.

3.2 The barn-style dwellings would feature brick plinths and timber cladding to the elevations with pitched and tiled roofs over. The dwellings in plots 3 and 4 would be built to an L-shaped plan with forward projecting single storey wings faced in brick. As noted in the Design and Access Statement prepared by Starc Architects, this reflects the historic vernacular and rural setting of the surrounding area.

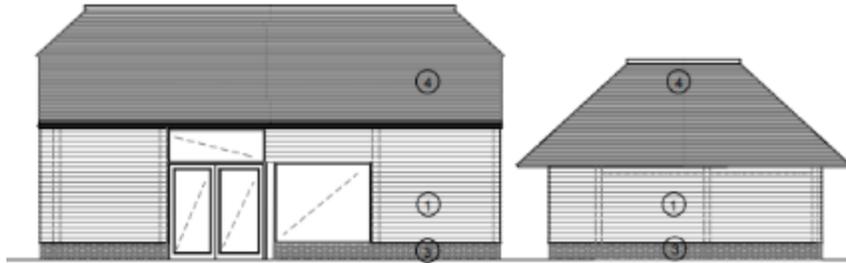
3.3 The existing access would be retained. The shared drive would lead south from the lane leading first to Plots 1 and 2 to the east. The drive would turn eastward with Plots 3 and 4 situated to the south. This results in an L-shaped barnyard setting for the dwellings.



Figure 15 - Proposed site layout

3.4 Wooded areas along the site boundaries would be retained and maintained outside of the residential gardens. The existing pond would be enhanced with the areas around it reinstated as neutral grassland.

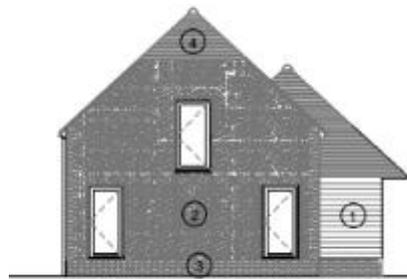
Plot 1



PROPOSED EAST ELEVATION



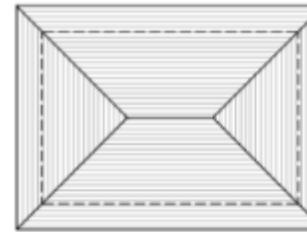
PROPOSED WEST ELEVATION



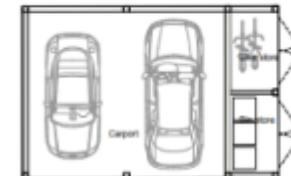
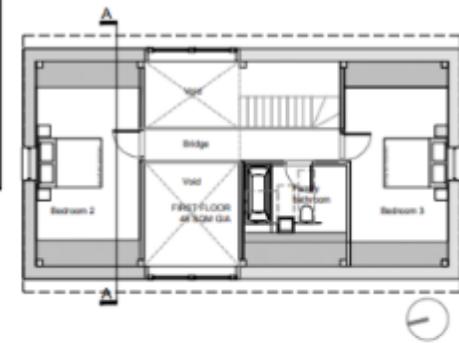
PROPOSED SOUTH ELEVATION



PROPOSED NORTH ELEVATION



PROPOSED FIRST FLOOR PLAN



PROPOSED GROUND FLOOR PLAN



Plot 2



PROPOSED EAST ELEVATION

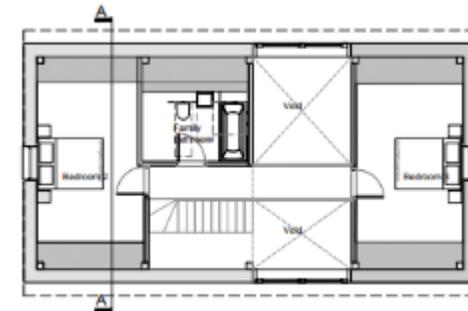


PROPOSED WEST ELEVATION

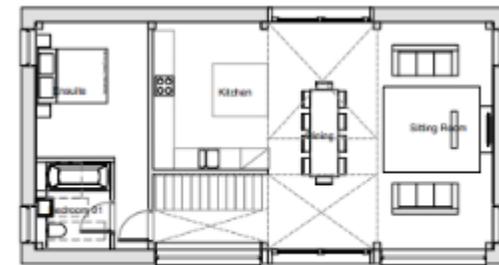


PROPOSED SOUTH ELEVATION

PROPOSED NORTH ELEVATION



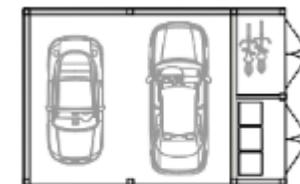
PROPOSED FIRST FLOOR PLAN



PROPOSED GROUND FLOOR PLAN



FRONT ELEVATION
GARAGE , REFUSE & BIKE STORE



GROUND FLOOR PLAN
GARAGE , REFUSE & BIKE STORE

Plot 3



PROPOSED EAST ELEVATION



PROPOSED WEST ELEVATION



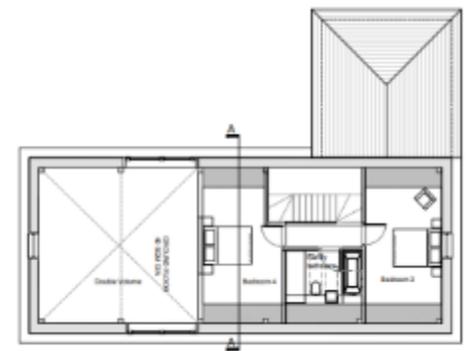
PROPOSED SOUTH ELEVATION



PROPOSED NORTH ELEVATION



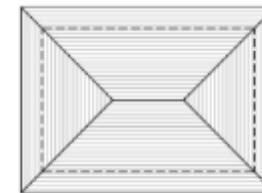
PROPOSED GROUND FLOOR PLAN



PROPOSED FIRST FLOOR PLAN



FRONT ELEVATION
GARAGE , REFUSE & BIKE STORE



ROOF PLAN
GARAGE , REFUSE & BIKE STORE



GROUND FLOOR PLAN
GARAGE , REFUSE & BIKE STORE

Plot 4



PROPOSED WEST ELEVATION



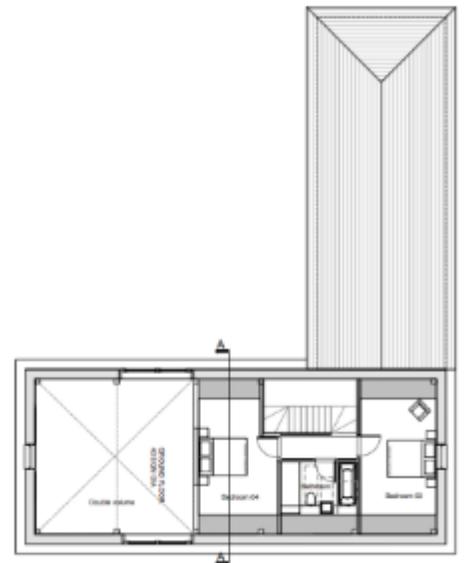
PROPOSED EAST ELEVATION



PROPOSED NORTH ELEVATION



PROPOSED GROUND FLOOR PLAN



PROPOSED FIRST FLOOR PLAN



4.0 PLANNING HISTORY

4.1 The relevant planning history for the application site is as follows:

- DC/20/0168 - Outline Application for the demolition of existing buildings and the erection of 4no. dwellings with associated parking and amenity space, with all matters reserved except for access. Refused 23 March 2020.
- DC/15/1894 - Outline application for the erection of 4 dwellings with all matters reserved except for access. Withdrawn. 20 October 2014

4.2 Application DC/20/0168 was refused for the following reasons.

1. *The proposed dwellings are located in a countryside location, outside of any defined built-up area boundary, on a site not allocated for development within the Horsham District Planning Framework or an adopted neighbourhood plan. The Council is able to demonstrate a 5-year housing land supply and consequently the proposed development would be contrary to the overarching strategy and hierarchy approach of concentrating development within the*

main settlements of the District. Furthermore, the proposed development is not essential to its countryside location. Consequently, the proposal for 4no new dwellings on the site represents unsustainable development contrary to policies 1, 3, 4 and 26 of the Horsham District Planning Framework (2015) and the National Planning Policy Framework (2019).

2. *Insufficient information has been provided in support of the application with regards to the loss of a commercial site/employment space and to justify the change of use within this rural location, contrary to Policy 9 of the Horsham District Planning Framework (2015).*

5.0 POLICY CONTEXT

5.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), the determination of an application must be made in accordance with the Development Plan unless material considerations indicate otherwise. This includes national and local planning policies.

5.2 On the national level, the National Planning Policy Framework (2024) and the following are material considerations.

- National Planning Policy Guidance (NPPG)
- National Design Guide
- Technical Housing Standards

National Planning Policy Framework 2024 (the “NPPF”)

5.3 The NPPF sets out the Government’s key objectives and planning policies for England and Wales. It provides a framework for the preparation of local plans for housing and other development and for the consideration of planning applications. Paragraphs 2 and 232 confirm that it is a material consideration in planning decisions from the date of its publication. Paragraph 3 notes that the NPPF should be read

as a whole and in conjunction with other Government policy publications “e.g. National Planning Policy Guidance (PPG), Written Ministerial Statements, the National Design Guide etc.”

Sustainable development

5.4 Chapter 2 confirms that the “purpose of the planning system is to contribute to the achievement of sustainable development.” (paragraph 7) As such, there are three overarching objectives detailed in paragraph 8 – economic, social and environmental - which are independent but need to be pursued in mutually supportive ways:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a

sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

5.5 Paragraph 9 makes clear that these objectives should be delivered through plans, but they are not criteria against which every decision can or should be judged. Planning decisions should actively guide development towards sustainable solutions, “but in doing so should take local circumstances into

account to reflect the character, needs and opportunities of each area.”

5.6 Paragraph 10 states ‘**So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).** For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay. Where there are no relevant development plan policies or the relevant policies are out of date, paragraph 11d) states that planning permission should be granted unless

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land,

securing well-designed places and providing affordable homes, individually or in combination.

5.7 Paragraph 12 of the Framework states that **“The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not normally be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.”**

5.8 In terms of decision-making, the Framework states at paragraph 39 that **“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the**

area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”

Supply of homes

5.9 Paragraph 61 states that **“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”.**

5.10 Paragraph 73 sets out that **“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built out relatively quickly.”** The development of a good mix of sites should be promoted and local planning authorities should:

a) identify, through the development plan and brownfield registers, land to accommodate at least

10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;

b) seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing;

c) use tools such as area-wide design assessments, permission in principle and Local Development Orders to help bring small and medium sized sites forward;

d) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and

e) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

5.11 Paragraph 78 sets out the requirement that local planning authorities “***should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.***” The supply should include an appropriate buffer (as detailed in the paragraphs 78 and 79).

5.12 Paragraph 83 states that “**To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.**”

5.13 Paragraph 84 states that “**Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:**

- a) *there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;*
- b) *the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;*
- c) *the development would re-use redundant or disused buildings and enhance its immediate setting;*
- d) *the development would involve the subdivision of an existing residential dwelling; or*
- e) *the design is of exceptional quality, in that it:*
 - *is truly outstanding or innovative, reflecting the highest standards in architecture, and would help raise standards of design more generally in rural areas; and*

- *would significantly enhance its immediate setting and be sensitive to the defining characteristics of the local area.”*

Transport

- 5.14 Chapter 9 highlights the importance of transport issues, which should be considered from the earliest stages of development proposals (paragraph 109). This is to ensure that (inter alia) the potential impacts of development on transport networks can be addressed. The planning system should actively manage growth to support sustainable transport, but it is acknowledged that opportunities to maximise solutions will vary between urban and rural areas, which should be taken into account in decision making (paragraph 110).
- 5.15 In assessing development proposals, paragraph 117 states that it should be ensured that there are appropriate opportunities to promote sustainable transport modes, that there is safe and suitable access to the site (for all road users) and that any significant impacts on the transport network or on highway safety terms can be cost effectively mitigated to an acceptable degree.

- 5.16 Paragraph 116 makes it clear 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, following mitigation, would be severe, taking into account all reasonable future scenarios.”**
- 5.17 Paragraph 112 states that if setting local parking standards for residential and non-residential development, policies should take into account the accessibility of the development, its type, mix and use, the availability of land and opportunities for public transport, local car ownership levels and the need to ensure that adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or optimising the density of development in city and town centres and other locations that are well served by public transport.

Making effective use of land

- 5.18 Paragraph 124 of the Framework states that **“Planning policies and decisions should promote an effective use of**

land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.”

- 5.19 Paragraph 125 confirms that planning policies and decisions should (inter alia) **“a) encourage multiple benefits from both urban and rural land, including through mixed used schemes... d) promote and support development of under-utilised land and buildings, especially if this would help meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).”**
- 5.20 Paragraph 126 states that local planning authorities **“should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs.”** Whilst paragraph 127 notes that **‘Planning policies and decisions need to reflect changes in demand for land.’**
- 5.21 When considering land which is developed but not allocated for a specific purpose in the local plan, local planning

authorities should take a positive approach to application for alternative uses including using **‘retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework...’** (paragraph 128).

- 5.22 Paragraph 129 states the planning policies and decisions should support development that makes efficient use of land taking into account identified housing need, land availability, local market conditions, the desirability of maintaining an area’s prevailing character and setting or of promoting regeneration and change and the importance of securing well-designed, attractive and healthy places.

Design

- 5.23 In terms of design, Chapter 12 seeks to achieve well designed places sets out that the **“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which**

to live and work and helps make development acceptable to communities” (paragraph 131).

- 5.24 Paragraph 135 further states that planning policies and decisions should ensure that developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping. Development should also be sympathetic to local character and history and should be designed with a high standard of amenity for existing and future users.
- 5.25 The contribution of trees to the character and quality of urban environments and to the mitigation of climate change is highlighted in paragraph 136.
- 5.26 Paragraph 139 states that **“Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:**

- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes: and/or**
- b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit with the overall form and layout of their surroundings.”**

Climate change, flooding and coastal change

5.27 Paragraph 161 states that the planning system should support the transition to net zero by 2050, taking into account all climate impacts. Development should plan for climate change, and paragraph 164 states that new development should be planned in ways that “avoid increased vulnerability to the range of impacts arising from climate change”, managing risks through adaptation measures, and help to reduce greenhouse gas emissions.

5.28 Paragraph 166 continues and sets out that, in determining applications, local planning authorities should expect new development to a) comply with development plan policies on local requirements for decentralised energy supply (unless it can be demonstrated that this is not feasible or viable) and b) take into account landform, layout, building orientation, massing and landscaping to minimise energy consumption.

5.29 Paragraph 167 advises that significant weight should be given to “the need to support energy efficiency and low carbon heating improvements to existing buildings (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights).”

5.30 Paragraph 170 states that development should be directed away from areas at highest risk of flooding (existing or future). Where development is necessary in these areas, the development should be “made safe for its lifetime without increasing flood risk elsewhere.” To ensure that development does not increase flood risk elsewhere, applications should be supported by site specific flood-risk assessments where appropriate (paragraph 181). Applications which could affect drainage on or around the site should incorporate sustainable

drainage systems proportionate to the nature and scale of the proposal. (paragraph 182).

The Natural Environment

- 5.31 Paragraph 187 states that planning policies and decisions should contribute to and enhance the natural and local environment by (inter alia) recognising the intrinsic character and beauty of the countryside; minimising impacts on and providing net gains for biodiversity; and preventing new and existing development from contributing to, being put at unacceptable risk from or being adversely affected by unacceptable levels of soil, air water or noise pollution or land instability.
- 5.32 If development results in significant harm to biodiversity which cannot be avoided, paragraph 193 states that planning permission should be refused unless this can be adequately mitigated or, as a last resort, compensated for.
- 5.33 Planning decisions should also ensure that development sites are suitable for the proposed use having regard to ground conditions and risks arising from land instability and contamination (paragraph 196). Paragraph 198 states that

decisions should ensure that development is appropriate to its location taking into account “the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.”

Development Plan

- 5.34 The Development Plan is made up of the Horsham District Planning Framework 2015 and the Shipley Neighbourhood Plan. Policies relevant to the proposal are set out below:

Horsham District Planning Framework 2015 (the “HDPF”)

- 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 9 - Employment Development
- Policy 15 - Strategic Policy: Housing Provision
- Policy 16 - Strategic Policy: Meeting Local Housing Needs
- Policy 24 - Strategic Policy: Environmental Protection

- Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
- Policy 26 - Strategic Policy: Countryside Protection
- Policy 31 - Green Infrastructure and Biodiversity
- Policy 32 - Strategic Policy: The Quality of New Development
- Policy 33 - Development Principles
- Policy 35 - Strategic Policy: Climate Change
- Policy 36 - Strategic Policy: Appropriate Energy Use
- Policy 37 - Sustainable Construction
- Policy 38 - Strategic Policy: Flooding
- Policy 40 - Sustainable Transport
- Policy 41 – Parking

The Shipley Neighbourhood Plan 2019-2031

5.35 The Shipley Neighbourhood Plan (the “Neighbourhood Plan”) was made on 23 June 2021. This includes the Shipley Design Guidance at Appendix 2 of the Plan. Relevant policies are detailed below:

- Ship HD1 – New housing Development
- Ship HD2 – Housing Mix

- Ship HD3 – High Quality Design
- Ship TT1 – Active Travel
- Ship CO2: Employment
- Ship Co3 – Broadband and Mobile Reception

Other material considerations

5.36 Other material considerations include

- Horsham Landscape Character Assessment 2003
- The National Planning Practice Guidance 2014 (NPPG)
- National Design Guide (2021)
- Technical Guidance: Nationally Described Space Standards 2015 (as amended)
- Natural England Water Neutrality Position Statement 2021.

Emerging Local Plan

5.37 The draft Horsham Local Plan 2023-2040 was submitted for final examination under Regulation 19, and the first week of hearing sessions was held on 10-12 December 2024. During the hearings, the Planning Inspector voiced significant concerns about the soundness and legal compliance of the plan, which were repeated in a letter to the Council dated 16

December 2024. It has been reported¹ that the concerns relate to whether:

- the Local Plan would meet housing needs and the Sustainability Appraisal
- the Council has discharged its duty to cooperate
- the required further work to address the above could be completed within six months as per the guidance on pauses in examination set out in the Procedure Guide for Local Plan Examinations 2024.

5.38 Consequently, the Inspector instructed those hearings scheduled in December and January 2025 be cancelled on this basis, and the examination has been put on hold. The Council has requested that the Inspector consider whether the hearings could be reopened to consider the expediency of add further sites to deliver housing need, and the Inspector has indicated that he will respond, but this response has not been published.

5.39 In light of the serious concerns voiced by the Inspector and the cancellation of the Local Plan hearings, the draft Local Plan policies should not be afforded weight in the assessment of applications at this time.

Housing Land Supply

5.40 The NPPF requires Local Planning Authorities (LPAs) to ensure that there is adequate provision of land to meet the housing need for their areas and are required to identify sites to meet five years' worth of housing. The NPPF also sets out a requirement for an additional buffer over the Plan's housing requirements which should be between 5% and 20% where there has been a significant under delivery of housing for the previous 3 years.

5.41 The Council's Core Strategy is over 5 years old, and the Council's latest Annual Monitoring Report (AMR) (2022/2023) confirms that the Council has a housing land supply of just 2.9 years when measured against standard methodology figures. As such the Council's adopted policies in respect of housing

¹ King, A. (2024). "Inspector cancels local plan examination hearings after just one session due to 'significant' soundness and legal concerns." *Planning Resource*. 19 December. Available at:

<https://www.planningresource.co.uk/article/1900503/inspector-cancels-local-plan-examination-hearings-just-one-session-due-significant-soundness-legal-concerns> (Accessed 23 February 2025)

are out of date and the tilted balance set out at paragraph 11d of the NPPF is engaged. This makes it clear that planning permission should be granted unless:

'i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole'.

5.42 Whilst the AMR states that the lack of supply should be considered against the housing allocations and policies of the emerging Local Plan (paragraph 7.33), the cancellation of the final examination hearing sessions mean that no real weight can be afforded to these policies. Whilst the Council awaits the Inspector's response to recommence hearings, the significant concerns raised points to considerable delays to the adoption of a new local plan. In the meantime, the gap between supply and demand is widening creating a greater deficiency in housing provision within the District.

5.43 The Council published the Facilitating Appropriate Development (FAD) Document in October 2022. The FAD recognises that the Council is likely to receive applications outside of defined Built Up Area Boundaries (BUABs) and on unallocated sites (such as this proposal) as it is unable to demonstrate a five-year housing land supply. Given this position and the principles behind HDPF Policy 4, it will consider positively applications that meet all of the criteria:

- 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 development is contained within an existing defensible boundary and the landscape character features are maintained and enhanced.

5.44 Whilst the FAD is a material consideration, this document pre-dates the update to the standard method and considerable increase to local housing need figures. As such, the weight attached to this document is somewhat diminished.

Relevant Legislation

5.45 In considering the issue of the principle of the proposed development it is necessary to also consider the legal framework within which planning decisions are made. Planning legislation holds that the determination of a planning application shall be made in accordance with the Development Plan unless material considerations indicate otherwise (as also confirmed at paragraph 2 of the NPPF).

5.46 Specifically, Section 70 (2) of the Town and Country Planning Act 1990 states that in dealing with planning applications, the Authority shall have regard to the provisions of the development plan (so far as material to the application), a post examination draft neighbourhood development plan, any local finance considerations (so far as material to the application) and any other material consideration.

5.47 Section 38(6) Planning and Compulsory Purchase Act 2004 provides:

"If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

5.48 When considering whether or not a proposed development accords with a development plan, it is not necessary to say that it must accord with every policy within the development plan. The question is whether it accords overall with the development plan (Stratford on Avon v SSCLG [2014] JPL 104). Even if a proposal cannot be described as being in accordance with the development plan, the statutory test requires that a balance be struck against other material considerations. The Courts have emphasised that a planning authority is not obliged to strictly adhere to the development plan and should apply inherent flexibility: Cala Homes (South) Limited v SSCLG [2011] JPL 1458 and Tesco Stores Ltd v Dundee City Council [2012] 2 P.&C.R. 9.

5.49 More recently in *Corbett v Cornwall Council* [2020] the appeal court judge emphasised the importance of considering the plan as a whole when he said;

“Under section 38(6) the members' task was not to decide whether, on an individual assessment of the proposal's compliance with the relevant policies, it could be said to accord with each and every one of them. They had to establish whether the proposal was in accordance with the development plan as a whole. Once the relevant policies were correctly understood, which in my view they were, this was classically a matter of planning judgment for the council as planning decision-maker.”

5.50 Part 6 of the Localism Act (enacted in January 2012) requires Local Planning Authorities to have regard to local finance considerations (so far as material to the application) as well as the provisions of the Development Plan and any other material considerations. The New Homes Bonus started in April 2011 and will match fund the additional Council tax raised for new homes and empty properties brought back into use, with an additional amount for affordable homes. The New Homes Bonus is as such an important consideration.

5.51 Conservation of Habitats and Species Regulations 2017 includes the duty on the competent authority to consider the implications of development upon the conservation objectives of the site within the framework of an Appropriate Assessment. In particular, there is the impact upon designated special habitats and areas of conservation.

5.52 The Environment Act 2023 introduced an amendment to the Town and Country Planning Act 1990 (as amended). It added Schedule 7A which details the requirement for development to achieve a 10% biodiversity net gain over existing development. It also sets out a number of exemptions to this requirement.

5.53 The Self-build and Custom Housebuilding Act 2015 (as amended) details the duty placed upon local authorities to address the need for self- and custom-build plots. Section 1 requires that local authorities keep a register of individuals and associations of individuals who are interested in building their own homes. Sections 2 and 2A of the Act relate to the duties of local authorities in relation to the provision of self-build and custom-build plots. The primary duty is to ensure that there are sufficient permissions for self-build and custom plots to meet the demand for such plots. The demand is measured by way

of register, taking into account the number of new entries to the register over a based period between 31 October and 30 October each year. The local authority has three years to provide enough permissions for custom and self-build plots to meet this demand. If demand exceeds 20% of the authority's land identified as available for housing, the local authority may apply to the Secretary of State to be exempt from the duty to grant planning permission.

6.0 PLANNING COMPLIANCE APPRAISAL

Principle

- 6.1 The NPPF at paragraph 73 sets out the important contribution of small sites and encourages local planning authorities to support opportunities for self-building housing.
- 6.2 Paragraph 83 of the NPPF states that "to promote development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."
- 6.3 Paragraph 84 continues that "planning policies and decisions should avoid the development of isolated homes in the countryside subject to certain criteria. The term "isolated" is not defined within the NPPF, but the courts have confirmed that it should be given its ordinary objective meaning of remote and far away from other places, buildings and people, and separate or remote from a settlement, services, and facilities.

Whilst in this case, the application site is located within Green Belt countryside the site is not located within 'isolated' countryside.

- 6.4 In this regard, the Court of Appeal judgement of Braintree District Council v Secretary of State for Communities and Local Government (2018) is relevant to consider which concluded that the term 'isolated' should be given its ordinary objective meaning, such as being "far away from other places, buildings or people; remote" (Oxford Concise English Dictionary) providing a spatial consideration. This enables a balance to be provided between protecting the countryside and supporting the vitality of rural communities, accepting also that flexibility has to be provided account for the differences between rural and urban areas requiring people to travel by car.
- 6.5 Policy 3 of the HDPF sets out that development will be permitted within towns and villages that have defined built-up areas; with development in the countryside more strictly controlled through the provisions of Policy 4. This policy states that development outside of the built-up areas will only be supported where the site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins a settlement edge.

- 6.6 Policy Ship HD1 states that new housing development would be considered favourably where they would infill a gap or affect previously developed land within the continuity of existing buildings and reflects the scale and density of existing development.
- 6.7 The site is outside a designated built-up area is in therefore in the countryside in policy terms. It is a windfall site not designated for residential development in either the HDPF or the Neighbourhood Plan. Whilst Policies 3 and 4 seek to direct development to the built-up areas, the policies do not expressly prohibit restrict development outside these areas.
- 6.8 Furthermore, the site is vacant previously developed land in the countryside. As a former commercial site, the highways and other traffic movements would be of greater scale than that associated with the residential use. The Statement will outline that the commercial use is no longer viable and as such, the change of use towards housing and the social, economic and environmental benefits would amount to sustainable development.
- 6.9 For these reasons, the proposal would accord with local and national planning policies as a whole and should be supported.

Housing Land Supply

- 6.10 Notwithstanding the above, it is important to note that the policies seeking to restrict development in the countryside are out-of-date. Whilst Policy 15 of the HDPF set out a housing target of at least 16,000 dwellings to be delivered over the twenty-year local plan period (1 April 2011 to 31 March 2031), this policy is more than five years old and therefore is no longer the starting point.
- 6.11 Following the publication of the revised NPPF and the associated amendment to the Standard Method in December 2024, local housing need for Horsham District increased from 917 to 1357 dwellings per year- a 47% increase to which the 5% buffer should be applied (paragraph 78 of the NPPF). In April 2025, the Council published its Housing Delivery Test Action Plan 2025. This noted that its Annual Monitoring Report (AMR), covering the period between 1 April 2023 – 31 March 2024, confirmed that the Council has a 1-year housing land supply. This is a very significant shortfall.
- 6.12 Accordingly, policies 1, 2, 4 and 24, which may seek to restrict housing in the countryside, are out of date. This has been established in recent appeals and acknowledged by the

Council in delegated reports, including those submitted to the Planning Committees in 2025.

6.13 It should be noted that the Council published 'Facilitating Appropriate Development' (FAD) in 2022 as it recognised that it is unable to demonstrate a five-year housing land supply and that the relevant policies of the HDPF are unlikely to be sufficient to justify refusals. Paragraph 5.7 of the document explains that given this position and the principles behind HDPF Policy 4, the Council will consider positively applications that meet five criteria (see paragraph 5.43). However, this document does not form part of the development plan and given the acute shortfall in deliverable housing land supply which has been identified since its publication, very little weight may be attached to this document.

6.14 Therefore, in accordance with Footnote 8 of the NPPF, policies related to the delivery of housing are out-of-date and very limited weight may be attributed to these policies which seek to restrict residential development. The presumption in favour of sustainable development detailed in paragraph 11d) of the NPPF may apply. This states that permission should be granted unless

- there is harm to protected areas or assets which provide a clear reason for refusal or
- the adverse impacts, when assessed against the policies of the policy framework as a whole would outweigh the benefits.

6.15 As will be demonstrated in this Statement, the proposal would result in a net gain of four dwellings to meet local housing need and would not result in adverse harm as identified above. The presumption in favour of development should therefore be engaged in assessing this scheme.

6.16 The proposed development is considered to meet all of the detailed in the document. The site makes use of existing previously developed land which is unoccupied. As detailed in following sections, the scale of the development is appropriate to this locality and landscape and would meet demonstrated housing needs and demands.

6.17 The Neighbourhood Plan is less than five years old, but it does not contain policies and allocations to meet the identified housing requirement. Thus, the protection for neighbourhood plans detailed in paragraph 14 of the NPPF does not apply, and the adverse impact of allowing development.

Nevertheless, this Statement demonstrates that the proposed development would not be contrary to the general aims of Policy Ship HD1 insofar as the proposal would amount to redevelopment of previously developed land which would be in scale and in keeping with the character of this area.

6.18 As such, there should be no objection in principle to the development subject to consideration of the proposal against the policies of the framework as a whole to which this Statement now turns.

Sustainable Development

6.19 In summary of the matters discussed, the proposal is considered to comply with the principles of sustainable development. This includes the three key objectives – economic, social and environmental addressed as follows:

a.) an economic objective – the proposal will make a modest contribution to the local building industry and associated trades in constructing the new dwellings. The development is also CIL liable and will attract the New Homes Bonus. Future occupiers of the dwellings would also support local businesses. The proposal

therefore complies with the economic aspect of sustainable development.

b) a social objective – the proposal provides for the construction of four new dwellings that will positively contribute towards the Council’s housing land supply and in particular the supply of self-build and custom housebuilding plots for which there is a statutory duty. The site is also sustainably located, within a short distance of the built up area which provides access to local services and facilities including education and public transport. In particular, paragraph 83 of the NPPF states **‘To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby’**. Occupiers of the new dwellings will help to enhance/maintain the viability of the area by using local services and facilities. The proposal

complies with the social objective of sustainable development.

c) an environmental objective – the proposal would lead to biodiversity net gain/ecological enhancements whilst assisting in meeting housing needs within the District in a manner which would not cause harm to the character and appearance of the landscape. There will be no undue intrusion into the countryside having regard to the design and layout of the development and its setting against existing development where the new dwellings will be viewed in context of nearby built form. The proposal thus complies with the environmental objective of sustainable development.

Design, layout and appearance

6.20 The NPPF sets out that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development. Developments should be visually attractive and sympathetic to the local character of the surrounding area and should optimise the potential of the site to accommodate and sustain

an appropriate amount and mix of development (paragraphs 135 and 139).

6.21 Paragraph 135 of the NPPF states that planning decisions should ensure that developments function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting; establish a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and create places that are safe, inclusive and accessible.

6.22 Policies 25, 32, and 33 of the HDPF promote development that protects, conserves and enhances the landscape character from inappropriate development. Proposals should take into account landscape characteristics, with development seeking to provide an attractive, functional and accessible environment that complements the locally distinctive character of the district. Buildings should contribute to a sense of place, and

should be of a scale, massing, and appearance that is of a high standard or design and layout which relates sympathetically to the landscape and built surroundings. Policy HD3 of the Neighbourhood Plan also reflects these principles.

6.23 The existing site is untidy in appearance, comprising a mix of buildings of no architectural merit and poor condition, large areas of hardstanding and external storage and unkempt land. Whilst not readily visible from the road, this can be discerned from the adjoining public footpath along the western boundary.

6.24 In contrast, the development is design and landscape-led. The proposal would replace the unattractive buildings and hard surface dominated appearance of the site with a mix of barn-style dwellings set within a pleasant and green environment. The design of the dwellings reflects a traditional appearance appropriate to this countryside context and its vernacular, and this is further detailed in the Design and Access Statement prepared by Starc Architects which accompanies this application. The external materials are appropriate to this setting, and the Council may secure details by condition if it deems this appropriate.

6.25 The barns have been arranged in a loose farmstead arrangement reflecting that found in agricultural settings. The dwellings would be situated within generous and spacious plots, and the quantum and density of development would be appropriate to the pattern of development within the countryside where small clusters of development surrounded by open land is a characteristic feature. This is evident to the east of the site around the junction of Saucelands Lane and Sincox Lane.

6.26 Moreover, as views of the development would be very limited by reason of the existing boundary trees and planting to be retained, the development would not result in harm to the landscape character or visual amenity of the countryside. The application includes a Landscape Appraisal prepared by Ramsay & Co. This notes the public viewpoints of the site and development and concludes that impact would be very limited. Where views are possible from the public footpath, the quantum of development and the greater soft landscaping when compared to the existing development would be more in keeping with this rural setting, thereby preventing the appearance of significant encroachment into the countryside or extension of existing settlements.

- 6.27 As a landscape-led scheme, the built development would be satisfactorily balanced with soft landscaping. The recommendations detailed in the Arboricultural Impact Assessment, accompanying this application, would be followed during the construction activities to ensure that trees are successfully protected and retained. These measures may be secured by condition. Additional planting and enhancement of existing natural features within the site (as detailed in the landscaping and biodiversity net gain plans) would further improve the soft landscaping features within the site.
- 6.28 The landscaping and layout of the development combined with the siting, scale, height and mass of the proposed dwellings will ensure that it would integrate appropriately into its surroundings and result in a positive benefit to the local environment.

Living conditions for future occupants

- 6.29 The proposed dwellings would provide satisfactory habitable accommodation for future occupants. The dwellings would exceed the minimum standards detailed in the Nationally Described Space Standards, and there would be adequate light and ventilation through the proposed fenestration.

- 6.30 As noted, the dwellings would be situated in spacious plots, providing adequate amenity space for future occupiers. In addition, the site includes a communal open space for the enjoyment of all residents.
- 6.31 The design, orientation and layout of the dwellings would ensure that each dwelling would enjoy adequate light, outlook and privacy to both the habitable rooms and gardens.
- 6.32 Plot 1 is situated to the north of the site, and the nearest dwelling would be some 70m to the northeast. This distance is sufficient to ensure that the neighbouring dwelling does not pose any harm to living conditions of the future occupiers.
- 6.33 In summary, the proposed dwellings are of a design that is appropriate to the character and appearance of the area having particular regard to the design, siting and scale of the adjoining dwellings and to the countryside landscape. Furthermore, a high quality living environment will be provided to future occupiers of the new dwelling. The proposal therefore complies in full with HDPF policies 25, 32 and 33; Neighbourhood Plan policy 5 and the requirements of the NPPF.

Neighbouring residential amenity

6.34 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. In terms of neighbouring residential amenity, the nearest dwelling is Fayreholme to the northeast. That dwelling is over 70m from the development, and this distance would ensure that the proposal would not result in adverse harm in relation to outlook, light or privacy. Having regard to the existing commercial use, the residential use of the site would not result in harm in terms of noise or disturbance.

Highways impact and parking

6.35 The NPPF sets out at paragraph 111 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.

6.36 Policies 40 and 41 of the HDPF promote development that provides safe and adequate access, suitable for all users.

Development should be appropriate in scale to the existing transport infrastructure, should integrate with the wider network of routes and include opportunities for sustainable transport. Policy Ship TT1 supports these aims.

6.37 The application site has a lawful commercial use, and the proposal would retain and reuse the access. The application includes a Transport Report prepared by GTA Civils which assesses the transport impact of the scheme. It notes that the nearest bus service stops 530m to the northwest of the site, a five-minute walk. This provides access to Storrington and Horsham amongst other locations. Whilst service may be limited, this is quite reasonable in a countryside setting. The NPPF notes in paragraph 110 that it should be acknowledged that sustainable transport opportunities would be different in rural areas when compared to urban areas, implying that some dependence upon private vehicles is acceptable.

6.38 With regard to access and highway safety, the existing gate would be removed and the drive upgraded to a width of 5m, allowing two-way traffic along the drive. The design of the drive and turning areas within the site would allow adequate space and turning facilities for vehicles, including refuse and

emergency vehicles, to ensure that they may enter and exit in forward gear.

6.39 The Transport Report details the finding of an Automatic Traffic Count Speed Survey (ATC) conducted at the site, which showed that traffic was travelling at under 33mph (based upon 85th% speeds recorded). The report concludes that the 2.4m x 49m visibility splay in both directions would exceed the requirements for a road of this character.

6.40 Having regard to vehicular traffic, the proposal would change the use of the stie from B1 and B8 uses to a residential use (C3). The Transport Report concludes that this would result in a reduction of traffic, in particular movements by HGB. As such, the proposal would have a positive impact with regard to reduced traffic along this local road network.

6.41 Turning to parking, each dwelling would include two car parking spaces within the car ports and plots 1, 3 and 4 would have a minimum of one car parking space in the drive. Cycle parking and storage can be provided within the residential curtilage of each dwelling. This would meet the adopted standards detailed in the West Sussex County Council parking guidance.

6.42 In line with Approved Document S of the Building Regulations, each plot would include an electric vehicle charging point.

6.43 For the above reasons, the proposal would not result in adverse harm to highway safety or the local road network and would accord with Policies 40 and 41 of the HDPF and the NPPF.

Biodiversity and the natural environment

6.44 Policy 31 of the HDPF states that development will be supported where it demonstrates that it maintains or enhances the existing network of green infrastructure. Development proposals will be required to contribute to the enhancement of existing biodiversity and should create and manage new habitats where appropriate. The policy is aligned with paragraph 187 of the NPPF.

6.45 The application site comprises previously developed land which is predominantly hard surfaced or covered with buildings. As such, the proposed residential use and the introduction of gardens with soft landscaping offers an opportunity for ecological enhancement of the site. The landscaping plans detail the retention of existing trees and

planting to the external boundaries of the site along with additional planting internally and to the north boundary of the site (to the rear of units 1 and 2).

- 6.46 A Preliminary Ecological Appraisal (PEA) was undertaken by Arun Ecology, which identified two habitats of principle importance and a priority pond. This has informed the Biodiversity Net Gain Plan and development proposal to ensure the retention of the habitats and the enhancement of the pond, which is in decline.
- 6.47 One medium distinctiveness habitat (neutral grassland) would be lost, the development would recreate and extend the habitat area. This new grassland would be better connected and in better overall condition, thereby enhancing its contribution to the local natural environment.
- 6.48 The Habitat Management and Monitoring Plan details measures to ensure the delivery of ecological enhancements and continued maintenance/auditing post development.
- 6.49 Overall, the BNG plan would ensure that the impacts of the development upon the local environment is minimised and that

the on-site biodiversity net gain of 10% is achieved. Appropriate conditions may be imposed to secure this gain.

- 6.50 Thus, the proposal would accord with Policy 31 of the HDPF and the NPPF.

Water neutrality

- 6.51 The application site is situated within the Sussex North Water Supply Zone. Natural England issued a Position Statement advising that groundwater abstraction may have an adverse effect upon the integrity of the Arun Valley Special Area of Conservation (SAC) the Special Protection Area (SPA) and Ramsar sites. These areas are subject to protection as detailed in the Conservation of Habitats and Species Regulations 2017 (as amended). Thus, development will be required to demonstrate that they will not contribute further to an existing adverse effect.
- 6.52 The proposed development would replace existing buildings and activities with four residential dwellings. A Water Neutrality Report prepared by CGS Civils has been submitted as part of the application. It calculates the water usage associated with the new dwellings and makes recommendations for measures

to limit water usage including the use of water efficient fittings, water recycling and rainwater harvesting. These measures would ensure that the development is self-sufficient and water neutral. Although a mains connection is proposed, this would be for emergency use only.

- 6.53 Subject to the implementation of the measures proposed within the report, the development would not result in a significant impact on the Arun Valley SAC, SPA and Ramsar sites, either alone or in combination with other plans and projects. The proposal would not therefore adversely affect the integrity of these sites or otherwise conflict with Policy 31 of the HDPF, paragraph 180 of the NPPF or the requirements detailed in the Conservation of Habitats and Species Regulations 2017.

Drainage and Flood Risk

- 6.54 The application site is within Flood Zone 1, an area at low risk of flooding. In reducing the amount of land covered by building and hard surfacing and introducing rainwater harvesting measures, the proposal would have a positive effect upon surface water drainage within the site and reduce outflows to adjoining land.

- 6.55 Moreover, surface water drainage will be addressed on site via appropriate sustainable drainage systems. This would ensure that the development is neither at risk of flooding nor would increase flood risk within the surrounding area.

Sustainable design and construction

- 6.56 Policies 35, 36 and 37 of the HDPF require that development mitigates to the impacts of climate change through measures including improved energy efficiency, reducing flood risk, reducing water consumption, improving biodiversity and promoting sustainable transport modes. These policies reflect the requirements of Chapter 14 of the NPPF that local plans and decisions seek to reduce the impact of development on climate change.
- 6.57 The HDPF policies pre-date the amended building regulations set out in approved documents F, L and S. These were published in 2021 and came into effect on 15 June 2022 and would apply to the new dwellings. The documents represent the first phase of transition towards the Government's Future Homes and Buildings Standard, which aims to reduce carbon dioxide emissions by 75-80% when compared to the previous building regulations. As such, the aims of the development

plan policies are achieved and exceeded through the more recent, separate regulatory regime.

6.58 Furthermore, the dwellings would incorporate measures to ensure optimum energy efficiency. The proposed dwellings would conform to a fabric first approach to dwelling design incorporating which would ensure that the development exceeds the minimum Part L1 of the Building Regulations requirements by around 60%, a significant uplift. Measures include:

- High levels of insulation and designing out of thermal bridges
- Heating and hot water supplied by air source heat pumps with full time and temperature zone controls
- Passive solar design
- Solar photovoltaic systems.

6.59 Other measures include the installation of domestic white goods are a minimum A rating and stand alone electricity monitors would be fitted within the dwellings to assist future residents in monitoring energy use. In addition to water recycling detailed in the previous section, the development would also incorporate:

- Zero Avoidable Waste (ZAW) strategy.
- full fibre broadband site connectivity
- dedicated refuse and recycling storage capacity
- cycle parking facilities and
- electric vehicle charging points (as required by approved document S).

6.60 Subject to these measures, the development would meet national and local policies seeking to ensure that the development meets the challenges of climate change.

Employment land

6.61 Policy 9 of the HDPF states that the “redevelopment of employment sites and premises outside Key Employment Areas, must demonstrate that the site/premises is no longer needed and/or viable for employment use’.

6.62 The application site has been vacant for some years following the departure of the last tenant. The existing buildings are of poor quality and not fit for purpose due to their size, condition and construction. The cost of repair and replacement to these structures is not economically viable for this type of site in this location.

6.63 Furthermore, although a hybrid B1 (office) and B8 (storage and distribution) planning use, the site is predominantly arranged as a B8 storage premises with considerable outdoor storage, and the employment density associated with this activity is low. The Employment Density Guide published by the Homes and Communities Agency² notes that a “Final Mile” Distribution Centre would average 1 full time equivalent employee per 70sqm (gross external area). The site is not a formal distribution centre as such, but the Guide provides a useful starting point for evaluating the potential employment opportunity generated by the site. In this case, it is considered that the employment density would be lower in light of the location, the condition and size of the buildings and the level of outdoor storage at the site.

6.64 In this context, the potential loss of employment would not be significant. Any harm associated with this would be offset by way of the benefits – contribution to local housing need, ecological enhancement/biodiversity net gain, improved appearance of the site, reduced traffic generation to this rural area.

Heritage

6.65 The application site is situated some 200m to the southeast of the eastern edge of the residential garden of Saucelands, a Grade II listed building. The farmhouse dates from the 17th Century, if not earlier, and sits within an extensive landholding (approximately 51 acres) which includes the main curtilage gardens laid out to the south and east of the listed building. These contain a number of ancillary buildings, including stables and garaging.

6.66 The application includes a Heritage Report prepared by Chidhurst Heritage, and this notes that the significance of the designated heritage asset is derived from its historic fabric and age presence in the settlement, architectural form and its place within the context of the former farmstead, none of which would be affected by the application proposal.

6.67 The application site was formerly associated with the listed building and its historic holding and can be said therefore to contribute to the way in which the listed building is understood. However, given the distance between the site and the listed

² Homes and Communities Agency (2015) *Employment Density Guide, Third Edition*.

building and its historic curtilage, the site plays only a peripheral role in the setting of the listed building within limited visual permeability between the curtilage of Saucelands and the application site, which established a clear spatial and visual separation between the two sites. Nevertheless, the proposal is mindful of the historic context of the land and the role it played as part of the wider landholding and farmstead.

Community Infrastructure Levy

6.68 The Council has adopted a CIL charging schedule, which is noted as part of the application. As self-build and custom-build plots, these would be exempt from CIL, but appropriate applications would be forwarded as plots come forward for development.

7.0 CONCLUSIONS

- 7.1 This Planning Statement supports the construction of four dwellings at Greenacres, Saucelands Lane. The site is outside the Built-up Area Boundary and is not allocated for development with the HDPF or the Neighbourhood Plan. However, it is previously developed land, and the proposed residential use would result in a net decrease to vehicular movements to and from the site when compared to the existing lawful use. Moreover, although rural, there is access to sustainable transport within a close proximity of the site offering future occupiers an alternative to travel by private vehicle. The dwellings would not be isolated with residential development in the vicinity.
- 7.2 The development plan policies are over six years old and the Council is unable to demonstrate a five-year supply of deliverable housing sites when calculated against housing need. As such, in accordance with paragraph 11 of the NPPF, no or very limited weight can be attributed to development plan policies seeking to restrict residential development in the countryside. The presumption in favour of development therefore applies unless the policies in the Framework relating

to protected areas provide a reason for refusal or the harm associated with the proposals when assessed against the policies of the Framework as a whole provides clear reason to refuse development.

- 7.3 With regard to protected areas and assets, it has been demonstrated that the proposal would not result in harm on its own or cumulatively with other development to the Arun Valley SAC, SPA and Ramsar sites. The development would be water neutral and would not adversely affect these important habitats. Moreover, the proposal would not result in harm to the setting of Saucelands, a grade II listed building to the northwest of the site. The proposal would not alter the historic significance of the building which relates to the age and historic fabric of that building. Although the site may have formed part of the wider landholding of the farm associated with Saucelands, the development would not result in harm to the setting of the listed building. The distance between the development and the curtilage of the designated heritage asset alongside the intervening land and trees/planting, would ensure little visual permeability between the two areas.
- 7.4 Turning to the impacts of the development with regard to the NPPF and development policies as a whole, the proposal

would improve the character and appearance of the site within this setting. The existing buildings are of no architectural merit and indeed, the existing appearance of the site detracts from the beauty and rural character of the area. In contrast, the proposed development has been designed to reflect the rural and historic character of the area. The design and layout of the plots, the overall quantum of development and proposed landscaping would not appear prominent or discordant within this setting. The quantum of development and landscaping would provide a pleasant and verdant setting achieving a significantly improved balance of built development to soft landscaping within the site. The limited scale of the development combined with the open fields around it would ensure that there would be no urbanising effect, particularly when compared to the existing development which spreads across and occupies the whole of the site.

7.5 The proposal would provide appropriate and satisfactory living conditions for future occupants of the dwellings, and there would be no adverse harm to the amenities of neighbouring residents.

7.6 There would be no adverse or severe harm in relation to highway safety, and the proposal would result in a reduction of

traffic, particularly that of HGVs, travelling to and from the site. This is of positive benefit to the capacity to local road networks. In addition, sufficient car and cycle parking within the plots would be provided.

7.7 In light of the current site arrangement, the proposal would result in ecological enhancements to the site and would ensure that a biodiversity net gain is achieved. In addition to the removal of large areas of hard surfacing, significant planting would be retained and reinforced. In addition, existing habitats would be retained or reinstated, with improvements to the condition of the pond and neutral grassland areas which would enhance the contribution of the site to the local natural environment.

7.8 The development has also been designed to address the demands of climate change, including potential flood risks. These measures could be secured by condition.

7.9 The proposal would result in the loss of an employment site. However, the site is unoccupied and given the location and condition of the buildings, it is no longer viable. Moreover, given the commercial use operating from the site, it generated

low employment levels, and the potential loss of employment would be outweighed by the contribution to housing.

7.10 On balance and in accordance with the provisions of NPPF paragraph 11 d), the proposal would not result in adverse harm to the special habitats/protected areas or assets, and there are no adverse impacts of granting planning permission that would significantly and demonstrably outweigh the benefits of the provision of four sustainably located dwellings when assessed against the policies of the NPPF taken as a whole. As such, the tilted balance is engaged.

7.11 The Statement has identified a number of benefits to the proposal.

- The proposal would result in a net gain of four dwellings at a time when the Council can demonstrate a one-year housing land supply. The NPPF seeks to significantly boost housing supply, and the Government has made clear that its ambition to increase the delivery of housing against existing targets. In this context, significant weight must be attributed to the social benefit arising from the contribution of four dwellings towards meeting this acute need for

housing, particularly where this would make efficient use of previously developed land which is currently vacant.

- The development would improve the character and appearance of the site compared to the existing untidy and unattractive appearance. This would have a positive social and environmental benefit to which significant weight should be attached.
- The construction of the dwellings would result in a short-term economic benefit during the construction process.
- Future residents would support local business and services providing social and economic benefits to which moderate weight should be applied.
- The proposal would result in ecological enhancements and biodiversity net gain of 10%. Although the development is small scale, significant weight should be attached to this environmental benefit.

7.12 The statement concludes that the development would not cause adverse harm in relation to other planning policy considerations and would accord with the criteria of the Facilitating Appropriate Development document adopted by the Council. It is acknowledged that the site is outside the built-up area, but policies seeking to restrict this are out-of-date.

Although the development would result in the loss of an employment site, the employment levels are low, and the site is no longer viable due to its condition and location. Thus, the proposed re-use of the site to meet the acute housing need and the improvements and benefits arising from the development would outweigh this limited harm. The proposal thus amounts to appropriate and sustainable development, and it is hoped that the Council will support the grant of permission.