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Architectural Design

## PLANNING, ENERGY, AIR QUALITY, TRANSPORT AND DESIGN & ACCESS STATEMENT

**Proposal:** Erection of 4no. 3-bedroom dwellings with associated car parking, private amenity space and acoustic fencing. Creation of an ecological buffer zone.

**Appellant:** James Williams

**Date:** September 2025

### 1. Introduction & Background

1.1 This application has been submitted on behalf of James Williams in support of an application for full planning permission for the erection of 4no. 3-bedroom dwellings with associated car parking, private amenity space and acoustic fencing on land to the east of Old London Road in Montpelier Gardens, Washington, RH20 3BW. The proposals also seek consent for the creation of an ecological buffer zone to the east of the site, bordering the A24.

1.2 The site is situated within Montpelier Gardens in Washington, adjacent to the area designated for development under Policy 1 of the made Storrington, Sullington, Washington Neighbourhood Plan (SSWNP). The immediacy has been subject to various planning applications, as set out within this Statement. As such, the principle of development in this location is considered to be entirely acceptable.

This application is supported by the following documents/drawings:

- Application Forms
- CIL Forms
- Notice Letters and Forms
- Planning, Energy, Air Quality, Transport and Design & Access Statement
- Architectural Drawings including Location and Block Plans
- Ecology Reports and BNG
- Noise Impact Assessment
- Drainage Statement
- Water Neutrality Statement



## 2. The Site

2.1 The application site is situated to the east of Old London Road in Washington and to the east of Montpelier Gardens. In total the site area is approximately 0.1ha. Refer to Location Plan for further information.

2.2 The site consists of an irregular shaped piece of land which slants from west to the east, towards the A24. The majority of the land is vacant whilst the southern end is used as access for the neighboring garages. The land is entirely within the ownership of the Applicant.

2.3. As discussed in further detail within this Statement, the site is situated adjacent to Montpelier Gardens in Washington where development is supported under Policy 1 of the made Storrington, Sullington, Washington Neighbourhood Plan (SSWNP). The area has been subject to various planning applications / residential development in recent years, as discussed in further detail later in this Statement.

2.4 The immediacy comprises predominantly residential as a result, in the form of an eclectic mix of properties. Commercial uses are situated to the west of the site, approximately 90m away.

2.5 The site is within a sustainable location to the west of the A24 (London Road). The closest bus stops are situated on Storrington Road which can be accessed via an existing footpath from Old London Road, parallel to the A24.

2.6 The land is not constrained by any landscape or heritage designation. The Government's Flood Maps for Planning identifies that the site is situated within Flood Zone 1 which means that the land has a low probability of flooding. The site is subject to a small amount of surface water flooding and therefore this application is supported by a Drainage Statement.

## 3. Planning History for the Site and Immediacy

3.1 The site and immediacy has been subject to extensive planning history as set out below.

### The Site Planning History

3.2 The following history pertains to the site but is not exhaustive. The following comprises relevant applications only in consideration of the proposals.

**3.3 Reference DC/14/1720. Construction of 3 x two bedroom terraced dwellings. Refused and Appeal Dismissed on 1 October 2015.**

3.4 The above application was refused and dismissed at Appeal as the Inspector deemed the proposals to not represent sustainable development by reason of the site's location in the 'countryside'.

3.5 As discussed in further detail later in this Statement, the site's immediacy has been subject to extensive development in recent years, including a Neighbourhood Plan allocation adjacent



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to the site. As such, the principle of development is now considered to be acceptable and the site is no longer considered to comprise 'countryside'.

### Relevant Applications in the Immediacy

3.6 The following represents relevant planning applications in the immediacy:

3.7 Reference DC/21/1689. Outline application (all matters reserved) for the erection of 2x2 bed semi-detached dwellings, 3x2 bed terraced dwellings and 4x3 bed semi detached dwellings (9 units in total), provision of parking for 24 vehicles. Approved on 7 May 2024.

3.8 The above application site is located to the immediate north of the proposed site and received Outline consent in 2024 for the erection of 9no. dwellings. It is not clear yet when a Reserved Matters application will be submitted. The approved Site Plan can be seen below.



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Figure 1 - Approved Site Plan for Reference DC/21/1689



3.9 Following receipt of the above consent, the Applicant has applied to remove a condition pursuant to the Outline which requires details of water neutrality to be submitted. This is detailed below but not yet determined.



3.10 Reference DC/25/0837. Removal of Condition 8, 13 and 14 of previously approved application DC/21/1689 (Outline application (all matters reserved) for the erection of 2x2 bed semi-detached dwellings, 3x2 bed terraced dwellings and 4x3 bed semi detached dwellings (9 units in total), provision of parking for 24 vehicles) relating to water neutrality. Application pending.

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3.11 Reference DC/20/0660. Erection of 3 dwellings with associated car parking and landscaping. Approved 21 October 2020.

3.12 The above application site is located to the immediate west of the proposed site and received consent for 3no. dwellings. The site has since been built out but the approved Site Plan can be seen below.

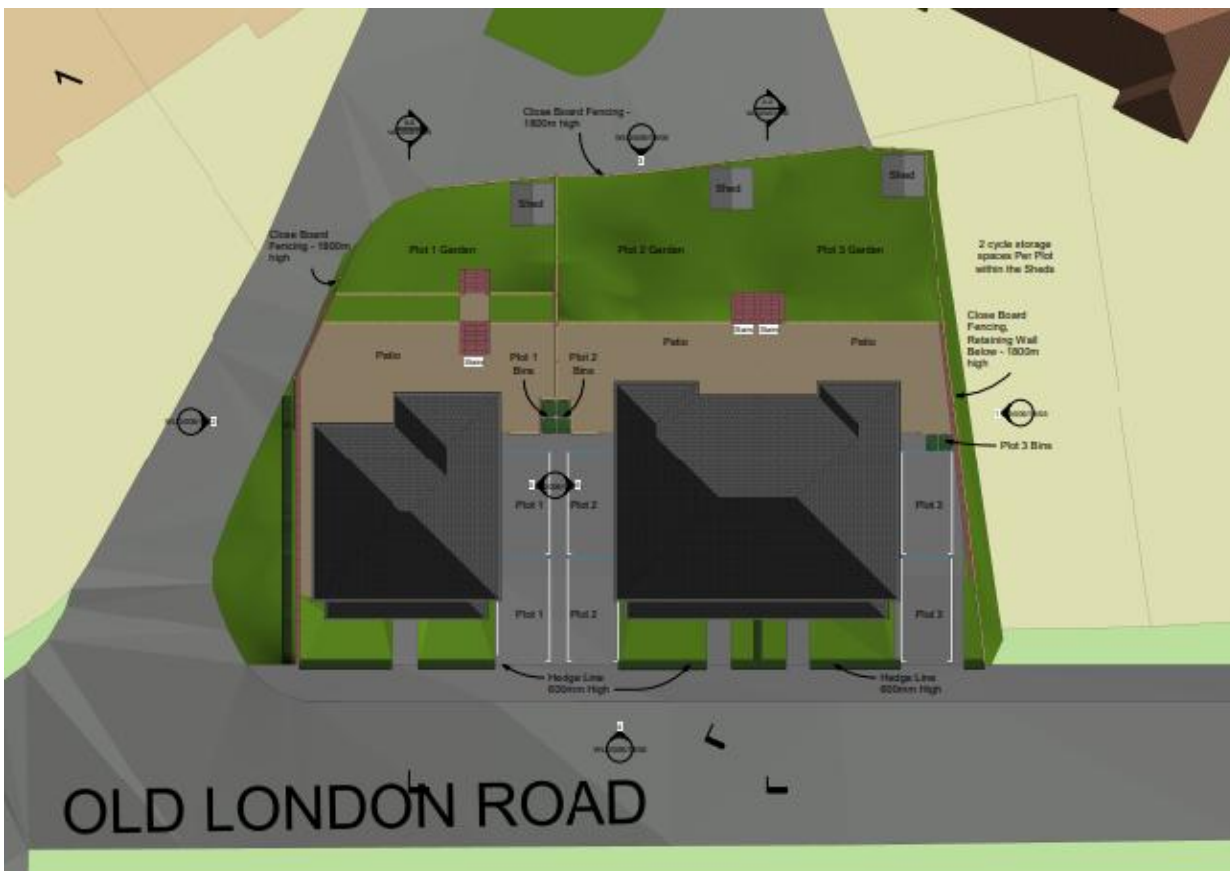


Figure 2 - Approved Site Plan for Reference DC/20/0660

3.13 Reference DC/20/0717. Demolition of existing dwellinghouse and erection of 16no residential dwellings (C3) with associated works. Vineyards Old London Road Washington Pulborough West Sussex RH20 3BN. Approved 15 September 2020.





3.14 The above application has since been built out following consent in 2020 and the approved Site Plan can be seen below.



Figure 3 - Approved Site Plan for Reference DC/20/0717

**3.15 Reference DC/18/2249.** Erection of a 2 bedroom attached dwelling with associated parking and new access onto Old London Road. The Chardonnay Restaurant Old London Road Washington Pulborough West Sussex RH20 3BN. Application Refused on 19 December 2018. Appeal Allowed on 25 September 2019.

**3.16 Reference DC/19/0281.** Reserved matters application for the erection of 3x3 bed terrace house and 2x3 bed semi detached houses with ancillary garaging following approval of outline DC/18/1603, relating to appearance, landscaping, layout and scale of the development. Former Highway Depot London Road Washington West Sussex RH20 3BN. Application Permitted 21 May 2019.

**3.17 Reference DC/18/1603.** Outline application (appearance, landscaping, layout and scale reserved for later consideration) for the erection of 3x3 bed terrace house and 2x3 bed semi detached houses with ancillary garaging. Former Highway Depot London Road Washington West Sussex. Application Permitted 3 October 2018.

**3.18 Reference DC/17/2498.** Proposed Change of Use from A3 Restaurant to C3 Residential (3 x 2 bedroom apartments) with associated parking (including 2 community spaces) and bin store.



Removal of existing conservatory and commercial binstore and enclosure and erection of new bin/cycle store. The Chardonnay Restaurant Old London Road Washington Pulborough West Sussex RH20 3BN. Application Permitted 24 January 2018.



3.19 Reference DC/12/0113. Erection of 8 (6 x 3-bed and 2 x 4-bed) new family homes with garages (following approval of outline planning application DC/10/1287). Lamorna Old London Road Washington Pulborough West Sussex RH20 3BN. Application Permitted 10 May 2012.

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#### 4. The Proposals

4.1 The proposals seek to erect 4no. 3-bedroom dwellings with associated car parking comprising 2no. spaces per dwelling. As set out in the Proposed Site Plan, the dwellings would be staggered to allow a transition between the inconsistent building lines to the north and south. The dwellings have further been designed to work with the change in site levels, creating architecturally interesting and practical homes.

4.2 The dwellings would all comply with Nationally Described Space Standards and each benefit from private garden space which would each accommodate a garden shed to accommodate bikes.

4.3 Bin stores would be located to the front of the site (west) and further details can be secured via condition if necessary.

4.4 To the south of the site, the existing access track to the neighbouring garages will be retained as existing.

4.5 To the east of the site is an area secured as an ecological buffer area which would also act as a noise barrier to the A24 to the east. This is considered further in this Statement and accompanying supporting documents.

4.6 As illustrated in the accompanying plans, the proposed dwellings would comprise of two storeys each and architecturally will reflect the dwellings to the immediate west.

4.7 Existing hedgerow and trees have been retained and enhanced where possible. New landscaping has been proposed throughout the site.

#### 5. Planning Policy Overview

5.1 The following comprises the relevant National and Local planning policies:

- National Planning Policy Framework (Sections 2, 5, 9, 11, 12, 14 and 15)
- Planning Policy Guidance
- Horsham District Planning Framework (Policy 1, 2, 4, 16, 25, 32, 33, 37, 40 and 41)
- Storrington, Sullington, Washington Neighbourhood Plan (Policy 1, 14, 15, 17, Community Aim 3)
- West Sussex County Council Guidance on Parking at New Developments



## 6. Planning Appraisal

### 6.1 Principle of Development



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6.1.1 The application site lies adjacent to Montpelier Gardens in Washington, within the designated Neighbourhood Plan area covered by the Storrington, Sullington and Washington Neighbourhood Plan (made in 2019). Policy 1 of the Neighbourhood Plan establishes a positive approach to new residential development where it is located within or adjacent to the built-up area boundary or where it is 'within the area within and around Montpelier Gardens'. Importantly, Montpelier Gardens is now expressly identified in the Neighbourhood Plan as an area where further residential growth is supported, marking a significant policy shift from when the site was considered at appeal. Accordingly, the principle of development on this site is considered acceptable.

6.1.2 It is noted that an earlier appeal on adjoining land (APP/Z3825/W/15/3035644, dismissed October 2015) concluded that the site at that time formed part of a "sporadic cluster of buildings in the countryside" and not a sustainable location for new housing. Since that decision, however, the policy environment has changed materially. The Neighbourhood Plan has since been adopted (2019) and now specifically includes Montpelier Gardens as a location where development is encouraged, thereby removing the site from being treated as isolated countryside. In addition, further consents have been granted in the immediate area, reinforcing the shift in settlement pattern. The earlier appeal decision was reached prior to these significant changes and therefore carries little weight in the current policy context.

6.1.3 The proposals are considered to be of a scale and nature that respects the character of the settlement. The scheme for four new dwellings represents a logical and natural infill, being well related to the existing residential development of Montpelier Gardens and consistent with the pattern of approvals in the locality.

6.1.4 At the district level, Horsham District Council is currently unable to demonstrate a five-year supply of deliverable housing sites. Furthermore, the Horsham District Planning Framework (2015) is out of date in terms of housing supply, and the emerging Local Plan remains at draft stage. In such circumstances, the presumption in favour of sustainable development set out in paragraph 11(d) of the National Planning Policy Framework (NPPF) is engaged. The delivery of four additional dwellings on this site will make a small but important contribution towards addressing Horsham's significant and ongoing housing need.

6.1.5 The site is well related to the existing settlement pattern, benefits from good accessibility to local services and facilities in Washington, and lies within close proximity to larger centres including Storrington and Steyning. It is not subject to any landscape, ecological, or heritage designations that would otherwise restrict development. The principle of residential development in this location is therefore acceptable, being in full accordance with Policy 1 of the Storrington, Sullington and Washington Neighbourhood Plan, consistent with the strategic objectives of the Horsham District Planning Framework, and supported by the presumption in favour of sustainable development contained in the NPPF.



6.1.6 Accordingly, the principle of development is firmly established, and the proposal represents a sustainable, plan-led response to both local and district housing needs.

## 6.2 Design, Form and Appearance



6.2.1 The proposed development has been carefully designed to integrate positively with its surroundings and to respond sensitively to the character of the existing built form. Policy 33 (Development Principles) of the Horsham District Planning Framework (HDPF) requires new development to make efficient use of land, ensure that its scale, massing and appearance are in keeping with the character of the surrounding townscape, and to provide a high standard of design that contributes to a sense of place. Similarly, Policy 15 (Design) of the Storrington, Sullington and Washington Neighbourhood Plan emphasises the importance of high-quality design which reflects local character, respects building lines, and uses materials that are in keeping with the wider settlement.

6.2.2 The proposed layout has been deliberately staggered in order to provide a seamless transition between the varied and inconsistent building lines of properties immediately to the north and south. This approach ensures that the development sits comfortably within the existing street scene and avoids any abrupt change in character, in accordance with the Neighbourhood Plan's design principles.

6.2.3 The proposed dwellings have been carefully designed to work with the existing site levels, creating practical homes. As illustrated in the proposed plans, the dwellings will be two storeys in height, reflecting the prevailing scale of surrounding residential properties. A terraced form has been adopted, which makes efficient use of land while respecting the character and grain of the local area. At a density of four dwellings on a 0.1ha site, the scheme is consistent with that of the surrounding development and represents an appropriate level of intensification in this sustainable location. It should be noted that the scheme to the north (DC/21/1689) had a development density of 42.85 dwellings per hectare (9 dwellings on a 0.21ha site). The proposed density would be 40 dwellings per hectare and is therefore evidentially comparable with surrounding development.

6.2.4 In terms of appearance, the dwellings will be constructed in traditional brick with tiled roofs, drawing directly on the established palette of materials within Montpelier Gardens and the wider Washington settlement. This ensures the proposed homes reinforce local distinctiveness, in line with HDPF Policy 33, Policy 15 of the Neighbourhood Plan, and the design principles of the National Planning Policy Framework (NPPF).

6.2.5 The overall design therefore achieves a careful balance between making efficient use of the site to deliver much-needed housing, and ensuring that the form, scale and appearance of the dwellings are in keeping with the established character of the area. The development will make a positive contribution to the streetscape and sit harmoniously alongside neighbouring properties.





## 6.3 Residential Amenity

6.3.1 The proposed scheme has been designed to ensure that a high standard of residential amenity is achieved for both existing neighbouring occupiers and future residents, consistent with Policy 33 of the Horsham District Planning Framework (HDPF) and Policy 15 of the Storrington, Sullington and Washington Neighbourhood Plan.



6.3.2 The terrace form of the development means that side-facing windows are not required, thereby avoiding any risk of direct overlooking into adjacent properties. To further safeguard privacy, no windows are proposed within the end elevations of the terrace. Appropriate boundary treatments, including close-boarded fencing, will be provided to delineate garden spaces and to prevent overlooking between plots and into neighbouring gardens.

6.3.3 The orientation of the development on a west-east axis reflects the surrounding settlement pattern and ensures consistency with neighbouring residential properties. This orientation avoids issues of overshadowing and allows good levels of natural light to both the new dwellings and adjacent homes. The spacing between the proposed dwellings and existing neighbouring properties is also in keeping with the established character of the area, ensuring that outlook, daylight and privacy levels are maintained.

6.3.4 Private garden space is provided for each dwelling, meeting the expectations of the HDPF in delivering a good standard of amenity for future occupiers. The size and configuration of gardens are consistent with those found locally and provide appropriate opportunities for outdoor amenity and recreation.

6.3.5 Accordingly, the proposed development would deliver new housing that is compatible with its surroundings and safeguards residential amenity, in full accordance with relevant local and neighbourhood planning policies.

## 6.4 Access and Highways

6.4.1 The proposed development can be safely and appropriately accessed and is located within a sustainable location to the west of the A24 (London Road). Policy 40 (Sustainable Transport) of the Horsham District Planning Framework (HDPF) requires development to provide safe and suitable access for all users, reduce the need to travel by car, and promote sustainable modes of transport. These principles are reinforced by Policy 17 (Traffic & Transport) of the Storrington, Sullington and Washington Neighbourhood Plan.

6.4.2 The site is well connected to the surrounding settlement. The closest bus stops are located on Storrington Road, offering regular services to neighbouring towns and villages. These stops can be reached by a short walk via an existing footpath from Old London Road, which runs parallel to the A24. This ensures that the development has direct and convenient access to public transport options, reducing reliance on private vehicles.

6.4.3 Vehicular access to the site is proposed from Montpelier Gardens, which already serves a number of residential developments and provides a safe and established means of access. The proposed scheme has been designed to comply with West Sussex County Council's parking



standards, providing an appropriate level of car parking for each dwelling. In addition, secure cycle storage sheds are proposed for each unit, further supporting the use of sustainable travel modes in line with both local and national planning policy objectives.



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6.4.4 The scale of the development, at four dwellings, will not give rise to any significant increase in traffic movements or result in any adverse impact on the operation of the local highway network. The proposals therefore represent a sustainable and policy-compliant form of development in terms of access, parking, and transport connectivity.

## 6.5 Air Quality Assessment

6.5.1 Air quality is an important material consideration in the determination of planning applications, and is addressed in Policy 24 (Environmental Protection) of the Horsham District Planning Framework (HDPF). This policy requires development to avoid adverse impacts on air quality.

6.5.2 The application site is not located within or adjacent to an Air Quality Management Area (AQMA). The nearest AQMA is in Storrington, approximately 2 km to the south. Given the limited scale of the proposed development (four dwellings), the associated increase in vehicle trips and emissions will be negligible and will not give rise to any material impacts on local air quality conditions.

6.5.3 The site benefits from good accessibility to local services and public transport, including bus stops on Storrington Road within easy walking distance via established footpaths. Cycle storage is also proposed for each dwelling to encourage the use of sustainable travel modes. These measures are consistent with national and local policy objectives to reduce reliance on private car travel, thereby limiting the development's contribution to air quality impacts.

6.5.4 In line with best practice and up to date Building Regulations, the development will also incorporate electric vehicle (EV) charging provision for each dwelling. This will ensure that future residents have the opportunity to utilise low-emission vehicles, providing a long-term benefit to local air quality and aligning with the sustainability objectives of the HDPF and Neighbourhood Plan.

6.5.5 Given the modest scale of the proposals, the sustainable location of the site, and the inclusion of EV charging and cycle storage, the development will not result in any significant adverse impact on local air quality. On the contrary, it represents an opportunity to deliver new homes in a manner that is consistent with the District Council's and Government's objectives of improving air quality and reducing transport-related emissions.

## 6.6 Energy and Sustainability

6.6.1 Sustainable design and construction is a key requirement of both national and local planning policy. The National Planning Policy Framework (NPPF) places emphasis on the need for development to support the transition to a low carbon future, while Policy 36 (Appropriate Energy Use) and Policy 37 (Sustainable Construction) of the Horsham District Planning Framework (HDPF) seek to ensure that new development minimises energy demand,



incorporates renewable and low-carbon technologies where feasible, and achieves high standards of environmental performance.



6.6.2 The proposed development of four dwellings has been designed to reflect these objectives. The homes will be constructed to modern building regulation standards, ensuring high levels of thermal efficiency through the use of quality insulation, double glazing, and energy-efficient construction techniques. This will significantly reduce energy demand for heating and cooling, minimising the carbon footprint of the scheme.

6.6.3 Each dwelling will be equipped with electric vehicle (EV) charging infrastructure, in line with the Government's wider decarbonisation agenda and Horsham District Council's commitment to promoting sustainable modes of transport. Secure cycle storage is also included for every unit to further encourage low-carbon travel choices.

6.6.4 In addition, opportunities will be taken during the detailed design stage to incorporate water efficiency measures, low-energy lighting, and modern heating systems which will further reduce the dwellings' energy consumption and operational emissions.

6.6.5 The development therefore represents a sustainable and responsible form of growth, consistent with the requirements of Policies 36 and 37 of the HDPF, as well as the overarching sustainability objectives of the NPPF. By delivering energy-efficient new homes with integrated EV charging and provision for sustainable transport, the scheme makes a positive contribution towards Horsham District's transition to a low-carbon future.

## 6.7 Noise Impact Assessment

6.7.1 A noise assessment was undertaken by Entran Ltd (September 2025) for the proposed residential development at Old London Road, Washington, near Pulborough. The assessment considered existing noise conditions, primarily from road traffic on the adjacent A24.

6.7.2 Please refer to the noise assessment in full. For ease, the key findings of the assessment are set out below:

- Environmental noise surveys recorded daytime levels of up to 67 dB LAeq,16hr and night-time levels up to 60 dB LAeq,8hr at the site's eastern boundary.
- Internal noise criteria set out in BS 8233:2014 and the WHO Guidelines can be achieved through the specification of insulated glazing and attenuated ventilation systems.
- Minimum sound reduction requirements are 32 dB Rw+Ctr for façades facing the A24 and 26 dB Rw+Ctr for façades facing Old London Road.
- Ventilation systems should provide reductions of 37 dB and 31 dB Dnew+Ctr respectively. Windows may remain openable for occupant choice.
- Acoustic screening is proposed along the eastern boundary to mitigate noise in outdoor amenity areas, with barriers expected to reduce levels by up to 10 dB.
- While external noise levels may remain above guideline values, national guidance (BS 8233 and NPPF/NPSE) recognises that in higher noise areas a balance must be struck, and



development should not be prohibited where the lowest practicable noise levels are achieved.



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6.7.3 In conclusion, with the incorporation of the recommended glazing, ventilation, and screening measures, the site is considered suitable for residential development in noise terms. Internal living conditions will comply with the relevant standards, and external noise will be reduced to the lowest practicable levels.

## 6.8 Drainage and Flood Risk

6.8.1 A Flood Risk Assessment (FRA) and Drainage Strategy (Motion, August 2025) has been prepared to support the proposed development.

6.8.2 In summary, the site is located in Flood Zone 1 (very low probability of river/sea flooding) and is therefore appropriate for residential development. The 2025 Environment Agency surface water mapping confirms there is no risk of flooding across the developable area of the site. Some limited surface water risk exists on the eastern boundary along the adjacent watercourse, but this is outside the site's built footprint.

6.8.3 Other sources of flood risk (groundwater, sewers, reservoirs, infrastructure failure) are assessed as low to negligible. Climate change has been fully accounted for, with the drainage system designed to manage up to the 1 in 100-year storm + 45% allowance.

6.8.4 For the Drainage Strategy, infiltration is not feasible due to underlying clay geology. As such, surface water will be managed via a Sustainable Drainage System (SuDS), including:

- Permeable paving for driveways,
- Geocellular storage beneath patios,
- Flow control (hydrobrake) to limit discharge.

6.8.5 Runoff will discharge at a controlled rate of 1.6 l/s to the adjacent watercourse, which has proven connectivity to the wider catchment. Modelling confirms the system can attenuate all design storm events with no flooding. A Drainage Management & Maintenance Plan has been prepared to ensure long-term performance. Exceedance flows are directed safely eastwards, away from dwellings.

6.8.6 In terms of foul, the development will connect to the existing public foul sewer within the site boundary (Southern Water manhole 2804). Calculated flows are minimal (0.03 l/s), and Southern Water has previously confirmed capacity for similar connections in adjacent schemes.

6.8.7 In conclusion, the FRA and Drainage Strategy demonstrate that the site is at very low risk of flooding and that the proposed development can be safely accommodated without increasing flood risk elsewhere. The surface water strategy employs SuDS in line with national and local policy, and foul water can be accommodated within the existing network. Flood risk and drainage therefore present no impediment to the proposed development.





6.8.8 Please refer to the accompanying Flood Risk Assessment and Drainage Strategy which has been prepared by Motion for further information.

## 6.9 Ecology and Biodiversity Net Gain



6.9.1 This application is supported by a Preliminary Ecological Appraisal (PEA) and Biodiversity Net Gain Assessment (BNG) which have been prepared by Phlorum.

6.9.2 The following summarises the PEA:

- **Designations:** The site is not subject to statutory or non-statutory ecological designations. Closest statutory site is the South Downs National Park (0.1 km SW).
- **Habitats:** Surveys (Feb & Aug 2025) recorded modified grassland, ruderal vegetation, tall forbs, bramble scrub, mixed scrub, bare ground, and trees.
- **Protected Species:**
  - **Bats:** No roosts identified. Three boundary trees have low roost potential; these are to be retained. Site overall offers negligible bat potential.
  - **Birds:** Moderate potential for breeding birds; precautionary clearance outside nesting season advised.
  - **Reptiles:** Low potential (grassland, scrub, log piles).
  - **Amphibians:** Negligible potential for great crested newt (no ponds onsite, but some within 250–500m).
  - **Other Species:** Low to moderate potential for hedgehogs and badgers (foraging/commuting only). Low potential for stag beetles.
- **Constraints & Mitigation:**
  - Precautionary clearance for birds, reptiles, hedgehogs, and badgers.
  - No further detailed species surveys recommended.
  - Ecological enhancements advised (bird/bat boxes, planting, habitat features).

6.9.3 The following summarises the BNG:

- **Method:** Baseline habitats assessed Feb & Aug 2025; BNG calculated using Statutory Biodiversity Metric (DEFRA 2023).
- **Existing Habitats:** Modified grassland, ruderal vegetation, tall forbs, mixed scrub, bramble scrub, bare ground, and trees.
- **Post-Development:**
  - Loss of some scrub, tall forbs, and ruderal vegetation.
  - Retention of grassland, trees, some bramble scrub.
  - Enhancements include grass seeding on bare ground.
  - Creation of lawns, shrub planting, and 16 new native trees (fruit and medium-sized).
- **Results:**
  - Baseline value: 3.23 units.
  - Post-development value: 3.36 units.
  - Net change: +0.13 units (+3.97% net gain).
- **Next Steps:**



- Shortfall of 0.68 A1 tier units to be addressed via purchase of statutory biodiversity credits.
- A Habitat Management & Monitoring Plan (HMMP) required for long-term maintenance (30 years). This can be secured by planning condition.
- Further ecological benefits may arise from species-specific enhancements (bird/bat boxes, log piles) not captured in the metric.



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6.9.4 In summary, the site supports mainly common habitats with limited ecological value, most of which will be retained or enhanced. The development achieves a measurable +3.97% Biodiversity Net Gain, with residual losses of scrub and tall forbs to be compensated through statutory biodiversity credits which can be secured by planning condition. Ecological risks are low and can be managed through precautionary working practices and enhancements. No further surveys are required, making the site suitable for development with appropriate mitigation.

## 6.10 Water Neutrality

6.10.1 The site is within the Sussex North Water Supply Zone (SNWSZ), where Natural England requires all new development to demonstrate water neutrality to avoid further impacts on the Arun Valley designated sites. As such, a Water Neutrality Statement (Motion, August 2025) has been prepared for the proposed development.

6.10.2 In summary, the existing undeveloped site has a baseline water demand of zero. Without mitigation, the proposed homes would result in an additional 1,235 litres/day demand, based on Building Regulations' standard consumption of 125 litres per person/day. Through the use of water efficient fixtures and fittings, the scheme will achieve an improved performance of 84.45 litres per person/day (below the Building Regulations optional target of 110 l/p/d). This reduces the development's demand to approximately 834 litres/day.

6.10.3 It is proposed that the residual demand will be fully offset through the Sussex North Water Certification Scheme or an equivalent approved mitigation approach, secured by planning condition. As such, a Grampian-style condition is proposed to ensure offsetting is in place prior to commencement, with evidence required before occupation.

6.10.4 We look forward to discussing this approach with the LPA as soon as possible.

## 7. Conclusion

7.1 This planning application seeks full permission for the erection of four new dwellings on land adjacent to Montpelier Gardens, Washington. The appraisal has demonstrated that the proposed development is acceptable in principle, consistent with the adopted Storrington, Sullington and Washington Neighbourhood Plan and the Horsham District Planning Framework (HDPF), and aligned with the presumption in favour of sustainable development set out in the National Planning Policy Framework (NPPF).

7.2 The site is specifically supported for residential development under Policy 1 of the Neighbourhood Plan and represents a logical and sustainable infill opportunity that will make a



valuable contribution to addressing Horsham District Council's significant housing need, at a time when the authority cannot demonstrate a five-year housing land supply. The appeal history is no longer material given the adoption of the Neighbourhood Plan and the approval of precedent schemes in the immediate locality.



7.3 The proposed dwellings have been carefully designed to respect the form, scale, and appearance of the surrounding built environment. The staggered layout responds sensitively to existing building lines, while the two-storey terraced form, traditional brick and tile palette, and development density are all consistent with neighbouring development. The scheme will sit comfortably within the street scene and reinforce the area's established character.

7.4 Residential amenity has been safeguarded through the orientation of the dwellings, the absence of side-facing windows, and the provision of appropriate boundary treatments and private gardens. Access is secured from Montpelier Gardens, with parking provision in line with West Sussex County Council's standards and dedicated cycle storage to encourage sustainable travel. The site benefits from excellent accessibility to local services and public transport, further supporting a shift away from car dependency.

7.5 Environmental considerations have also been fully addressed. The small scale of the development ensures there will be no adverse impacts on air quality or the local highway network. Each dwelling will be provided with electric vehicle charging infrastructure, secure cycle storage, and energy-efficient construction to modern standards, ensuring the scheme supports the District's transition to a low-carbon future.

7.6 A Noise Impact Assessment has been prepared in support of the proposals due to the site's close proximity to the A24 and concludes that BS 8233 internal criteria would be achieved following implementation of adequate insulated glazing and attenuated ventilation. The external amenity areas may exceed the upper guideline noise level however, in line with guidance, development should not be prohibited on this basis. Acoustic fencing and screening is further proposed to the east to mitigate noise and surrounding planning approvals in the immediacy demonstrate that the location is acceptable for residential development.

7.7 The submitted Flood Risk Assessment and Drainage Strategy (Motion, August 2025) confirms the site lies in Flood Zone 1 with no identified risk of flooding across the developable area, and only limited surface water risk on the far eastern boundary outside the built footprint. All other flood risks are negligible, and climate change has been fully considered. Surface water will be managed through a robust SuDS scheme (permeable paving, geocellular storage and flow control), discharging at a controlled rate to the adjacent watercourse with no increase in flood risk elsewhere, supported by a long-term maintenance plan. Foul flows will connect to the existing public sewer with sufficient capacity. Overall, the assessment demonstrates that the development can be safely delivered in line with policy, with flood risk and drainage presenting no constraint to the proposals.

7.8 In terms of water neutrality, the Water Neutrality Statement (Motion, August 2025) confirms that while the proposed development would generate a new water demand, efficient fixtures and fittings will significantly reduce usage to around 834 litres/day, well below Building Regulations standards. The remaining demand will be fully offset through the Sussex North Water Certification Scheme (or equivalent), secured via a Grampian-style planning condition



requiring mitigation to be in place before occupation (and to be discussed with the LPA). On this basis, the scheme achieves water neutrality in line with Natural England's requirements for the Sussex North Water Supply Zone, ensuring no adverse impacts on the Arun Valley designated sites.



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#### 7.9 The Preliminary Ecological Appraisal and Biodiversity Net Gain

Assessment confirm that the site supports only common habitats of limited ecological value, with no statutory designations and negligible to low potential for protected species. Most habitats will be retained or enhanced, with mitigation secured through precautionary clearance methods and ecological enhancements such as bird and bat boxes. The Biodiversity Net Gain assessment shows a +3.97% net gain in habitat units, with a small residual shortfall addressed through statutory biodiversity credits and secured by condition, alongside a long-term management plan. Overall, ecological constraints are low, appropriate mitigation is achievable, and the development can proceed without adverse effects on biodiversity.

7.10 In conclusion, the proposed development represents a sustainable, well-designed and policy-compliant scheme that will deliver much-needed housing in a suitable and supported location. It fully accords with the Storrington, Sullington and Washington Neighbourhood Plan, the Horsham District Planning Framework, and the NPPF, and there are no material considerations that indicate permission should be withheld. Planning permission should therefore be granted without delay.

