

Planning Department
Horsham District Council
Parkside,
Chart Way,
Horsham,
RH12 1RL

29 May 2025 Dear Sir / Madam,
Ref: SL/Let/

Full Planning Application for the “Change of Use from Finance and Professional Services (Use Class A2) to 2no. Apartments (Use Class C3) at the first, second and third floors and open Class E use at ground floor level” at 24 Carfax, Horsham, RH12 1EB.

On behalf of our client, **Geneva Investments**, ECE Planning Ltd have been instructed to prepare a Full Planning Application for the proposed change of use to form 2no. Apartments (Use Class C3) and maintain the commercial use of the ground floor.

This Planning Application has been submitted online via the Planning Portal under reference **PP-10400308** and includes the following documents/drawings:

- Planning Application and CIL Forms;
- Planning Covering Letter;
- Suite of Architectural Drawings including Location and Block Plans.
- Water Neutrality Statement

The Site

The site is located within the northeast corner of Carfax, forming part of the central pedestrianised area of Horsham Town Centre which has a variety of commercial uses, such as retail, estate and letting agents, cafes, restaurants and banks.

The surrounding context of 24 Carfax predominately comprises of three-storey buildings, with commercial uses at ground floor level and either commercial or residential uses on upper floors.

The adjoining terraced building to the south of the site is Grade II Listed, which is operated by Courtney Green Estate Agents and has a pedestrian access to Piries Place running between the two units at the ground floor level.

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The site is neither statutorily nor locally listed, although is located within Horsham Town Centre Conservation Area (refer to Figure1). The site is also located on Primary Retail Frontage within Horsham Town Centre's Primary Shopping Area.



Figure 1 - Conservation Area Map - Horsham

Planning History

A review of the Horsham District Council online register reveals the following pertinent site history. The following provides a summary of the relevant planning history for the site and surrounding area.

The Site

HU/140/97- Change of use from shop to class a2 (financial & professional services) at 24 Carfax Horsham West Sussex RH12 1EE. Approved 2 July 1997.

Surrounding Area

DC/13/0228- Change of use, internal conversions and alterations to elevations of annexe building, 25 Piries Place (part) and upper floors of 35 Carfax, from hotel C1 to residential C3 use and the erection of extension to annexe to provide access to building. Enlargement and change of use of shop in 25 Piries Place to alternative A1, A2, A3 use. (Full Planning) at 25 Piries Place Horsham. Approved 18 March 2015.

DC/11/2166- Change of use of the existing snooker club at 49 Carfax (D2) to 4 no. residential flats (C3) to include 1 x 1 bedroom flat and 3 x 2 bedroom flats with the existing first floor flat at 49b Carfax being incorporated into the scheme at 49A Carfax Horsham.

Approved 16 May 2012.

The Proposal

The proposal seeks to change the use of the first, second and third floors to 2no. apartments (Use Class C3) and open (Use Class E) at the ground floor level of 24 Carfax.

To facilitate the change of use, internal alterations are proposed including the removal and installation of walls. Minor external alterations as proposed as set out below:

- Existing ridge height raised to match neighbouring building
- New windows on south elevation opened within previously infilled openings
- New entrance formed in wall on the ground floor of the west elevation
- New dormers to the rear of the building
- Existing outhouse in courtyard demolished. New door added to the rear of the shop.
- New staircase added to third floor level
- Minor changes in floor levels

The proposed Gross Internal Area (GIA) of the 2no. apartments would equal 55sqm (1 bedroom) and 90sqm (2 bedroom) and would therefore comply with National Space Standards.

A secure and covered bike store would be located on the ground floor of the building and would accommodate 4no. bikes (2no. per unit). Adequate space for bins is proposed to at ground floor level provided enough space for 3no. 240 litre bins.

Please refer to the submitted drawing set for further information on the scheme.

Planning Policy Overview

National Planning Policy Framework (2024)

The National Planning Policy Framework (NPPF) was newly revised in December 2024 and is a material consideration in all planning applications.

The relevant sections of the NPPF relate to the presumption in favour of sustainable development, delivering a sufficient supply of homes, building a strong, competitive economy, ensuring the vitality of town centres, promoting sustainable transport, making effective use of land, achieving well-designed places, meeting the challenge of climate change, flood and coastal change and conserving and enhancing the historic environment. The relevant sections are not explored in detail within this letter but have been in the preparation of this application.

It is contended that the proposed scheme is entirely compliant with the relevant paragraphs of the National Planning Policy Framework.

Horsham District Planning Framework (2015)

The Horsham District Planning Framework (HDPF) was adopted in November 2015 and is the overarching planning document for Horsham District and replaces the Core Strategy and General Development Control Policies documents which were adopted in 2007.

The following policies within the Local Plan are considered to be relevant to the application.

Policy 1 Sustainable Development

Policy 7 Strategic Policy: Economic Growth

Policy 9 Employment Development

Policy 12 Vitality and Viability of Existing Retail Centres

Policy 13 Town Centre Uses

Policy 15 Housing Provision

Policy 16 Meeting Local Housing Needs

Policy 32 The Quality of New Development

Policy 33 Development Principles

Policy 34 Cultural and Heritage Assets

Horsham Local Plan Review

It should be noted that the adopted Horsham District Planning Framework is currently out of date by reason of it being over 5 years old. The Government require all Local Authorities to review the Local Plan every five years and therefore the Council are currently in the midst of preparing a new Local Plan for the district.

The Regulation 19 Local Plan has been published for a six-week period of representation from 19 January 2025 to 1 March 2025 and submitted for examination.

As of the 22 April 2025 the Planning Inspector examining the draft Local Plan informed the Council that it did not meet the tests of soundness and should be withdrawn.

Planning Appraisal

Principle of Development

The proposal seeks the change of use of the first, second, and third floors of 24 Carfax, Horsham from Finance and Professional Services (Use Class A2) to residential (Use Class C3), providing 2no. apartments. The ground floor will be retained in a flexible commercial use falling within Use Class E.

The site lies within the defined Built-Up Area Boundary (BUAB) of Horsham and is located in a highly sustainable town centre location. It benefits from excellent access to local services and facilities and is well served by public transport. As such, the development is consistent with national and local planning objectives which seek to focus development in accessible and sustainable locations.

Policy 5 (Horsham Town) of the HDPF supports proposals that contribute positively to the vitality and viability of the town centre, provided they meet certain criteria. The provision of residential accommodation at upper floor levels aligns with this policy objective and complements the ground floor commercial offer, thereby supporting a balanced scheme maintaining the ground floor offer.

Policy 12 (Vitality and Viability of Existing Retail Centres) of the HDPF encourages suitable residential uses in existing buildings within town centres. The proposed development would bring an underutilised space back into effective use and contribute positively to the mix of uses in the area. The residential use at upper levels is considered entirely appropriate and would not detract from the function or viability of the ground floor retail or commercial premises.

The floorspace to be lost comprises approximately 145 sqm of currently vacant accommodation. This represents a limited amount of employment floorspace, and its loss is justified by the public benefits of delivering new housing. In accordance with Section 11 of the NPPF, and specifically paragraph 128(a), the proposal constitutes an efficient use of previously developed land, delivering homes in an area of high housing demand while not undermining key economic sectors or the vitality of the town centre.

Further support is provided by paragraph 90 of the NPPF, which highlights the important role residential development can play in ensuring the vitality of town centres. The proposed apartments will contribute to footfall, and out-of-hours activity, thereby enhancing the wider function and resilience of the town centre.

The proposal is also aligned with the Government's broader policy direction encouraging the reuse of underutilised commercial space for residential purposes. This is evidenced by recent changes to permitted development rights under Class MA of Part 3, Schedule 2 of the General Permitted Development Order (GPDO), which allow for the change of use from commercial, business and service uses to dwellinghouses. Although a full planning application is submitted, the fallback position provided by Class MA is a material consideration in support of the scheme (albeit applying to the floorspace only and without external alterations).

Furthermore, the introduction of Class E provides greater flexibility in commercial uses, reducing the need to protect former office or A2 uses specifically. As such, there is no in-principle policy conflict in enabling a residential-led re-use of the upper floors.

In summary, the proposed development represents a sustainable, policy-compliant reuse of vacant floorspace, delivering modest but valuable housing in a highly accessible town centre location. The principle of development is therefore considered acceptable in accordance with national and local planning policy.

Design and Heritage

The site is located within the Horsham Town Centre Conservation Area, but the building itself is not listed. The proposals have fully considered the surrounding historic setting and as such, the proposed alterations are sensitive and insignificant.

The scheme proposes minor internal alterations to facilitate the change of use, and minor external alterations to create a good quality living environment for the future occupiers of the scheme.

The proposed external alterations seek to match the ridge height of the neighbouring dwellings, reopening the previously infilled windows on the southern elevation and the creation of a new entrance to the rear and demolishing the existing outhouse.

The proposed external alterations would not be visible from Carfax, with the exception of the windows on the southern elevation which are currently infilled but proposed to be re-opened. As such, this change is not considered to present any heritage concerns, given that neighbouring properties have similar open windows, and the building was originally designed with openable windows in this location. Therefore, the proposals are not deemed to have any adverse impact on the surrounding Conservation Area or the historic environment.

Further to the above, the proposals include a modest increase in the ridge height of the building in order to align it with the neighbouring properties on both the eastern and western sides. Although this represents a visible change to the southern elevation, it is considered appropriate within the context of the surrounding built form.

The adjustment ensures a more consistent and cohesive roofline, which reinforces the architectural character along the street scene. The proposed change is not considered to result in any harm to the character or appearance of the Conservation Area, as it reflects the scale and proportions of adjacent buildings and remains subordinate in its architectural detailing.

It is considered the other external changes to the building including those to the north, west and courtyard of the scheme are considered acceptable as they cannot be seen from the surrounding area.

In conclusion, the proposed internal and external alterations are modest in scale and serve to support the change of use while delivering a high-quality living environment for the residential units.

The site is currently in need of refurbishment, and as such, the proposals are considered to have a positive effect on the surrounding historic environment, aligning with both local and national planning policies.

Residential Amenity

The existing amenities of both the commercial and residential properties which currently surround the building have been fully considered in the preparation of this application.

The scheme provides well-proportioned internal layouts with appropriate access to natural light. Each unit benefits from clearly defined living spaces, with the reinstatement of traditional window openings improving internal daylight levels and the overall quality of accommodation. The retention of existing openings respects the historic character while delivering a comfortable and practical living environment.

Window placements have been sensitively considered to avoid any harmful overlooking of adjacent properties. Where possible, existing window locations have been utilised, and no new openings are proposed. The surrounding built context already features a close-knit development, and the proposals do not introduce any new forms of overlooking beyond the existing arrangement.

The proposed roof height adjustment, intended to align with neighbouring ridge heights, is minimal and has been carefully designed to avoid any material loss of light to adjoining properties. Given the orientation of the site and the position of neighbouring buildings, no adverse impacts in terms of overshadowing are anticipated.

The change of use and associated internal alterations are not expected to generate any additional noise or disturbance beyond what is typical for residential use in this area. Access arrangements remain largely unchanged apart from those to the western elevation.

Although external private amenity space is limited due to the constraints of the site, the location benefits from immediate access to nearby public open spaces and facilities. This is considered acceptable for this type of residential conversion in a central and sustainable location.

The proposals have been designed to protect neighbouring amenity, with no harmful impact on light, outlook or privacy. The modest ridge height increase aligns with surrounding buildings, and no new openings are proposed that would cause overlooking. Overall, the scheme respects the residential character of the area and complies with local amenity policies.

Transport and Parking

Pedestrian access for the proposed residential units will be to the rear of the property via the existing staircase and access from the rear of the property. The proposed residential units will benefit from separate private entrance doors, accessed via the communal staircase.

The site is located in a highly sustainable location with bus stops located within 40m of the site. Due to the highly sustainable Town Centre location, car spaces are not considered necessary in this area and for the size of the dwellings proposed. The site will however benefit from excellent pedestrian connectivity to the main town centre as existing.

As previously set out, the proposals seek to accommodate bike storage on the ground floor level of the site which will have enough capacity to hold 4no. bicycles (2no. spaces per flat). The proposed provision is considered to be entirely acceptable and in excess of standards.

It is concluded the site has a vast range of sustainable transport modes within walking distance of the site and the proximity of shops and services, as well as the provision of cycle storage. Therefore, it is considered the proposals will have no adverse impact on transport and highways matters.

Water Neutrality

The application site lies within the Sussex North Water Supply Zone, where developments must demonstrate water neutrality due to potential impacts on protected habitats. As there is no existing water usage data available and the building is currently vacant, a baseline of nil usage has been assumed.

The proposed residential element will accommodate approximately '3.2 residents' with water usage limited to 85 litres per person per day in line with Natural England guidance—totalling 340 litres per day (worst case scenario). Water-efficient fixtures and fittings will be installed throughout, but full neutrality will be achieved through offsetting via the Sussex North Offsetting Water Scheme (SNOWS).

The applicant supports the use of a Grampian condition to secure water neutrality through SNOWS, in line with recent Planning Inspectorate appeal decisions. This ensures the development will not increase water demand within the zone and remains compliant with current guidance and policy requirements.

Please refer to the submitted Water Neutrality Statement for further information on the scheme.

Conclusion

To conclude, this application for full planning permission seeks consent for the change of use from Finance and Professional Services (Use Class A2) to 2no. Apartments (Use Class C3) at the first, second and third floors and open Class E use at ground floor level at 24 Carfax, Horsham.

The proposed development represents an efficient and sustainable reuse of underutilised floorspace in a highly accessible town centre location. The introduction of two residential units would make a modest but valuable contribution to addressing Horsham's significant housing need. The limited loss of commercial floorspace is justified and acceptable in planning terms, particularly given the continuing commercial use at ground floor level and the broader policy support for mixed-use development in town centres.

The proposed minor external alterations have been carefully considered to ensure they respect the character and appearance of the Horsham Town Centre Conservation Area. The development would not give rise to any adverse impact on the heritage significance of the area or the quality of the streetscape.

In view of the above, the proposals are considered to be in full accordance with both local and national planning policy. We therefore respectfully request that planning permission is granted for the proposed change of use and associated works.

If you have any further queries or require further information, please contact me on 01903 248777.

Yours sincerely
ECE Planning


Huw James MRTPI
Director