Horsham District Council

DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:
DC/24/1545
Horsham Gates, North Street, Horsham, West Sussex,

DESCRIPTION:
Replacement of the existing timber cladding material on external walls and within the window units to non-combustible aluminium cladding, replacement of the rendered wall to a similar material with non-combustible insulation, and the replacement of the existing aluminium roof to a similar material with non-combustible insulation.

RELEVANT PLANNING HISTORY:

DC/15/0611	Erection of 45 new residential dwellings in two blocks ranging from 3 to 4 storeys in height, with undercroft car parking and associated landscaping (to the rear of gate three and land formally gate one)	Application Permitted on 07.01.2016
DC/16/0313	Minor material amendment to planning permission: DC/15/0611 (Erection of 45 new residential dwellings in two blocks ranging from 3 to 4 storeys in height, with undercroft car parking and associated landscaping (to the rear of gate three and land formally gate one)) including alterations to the lower ground floor car park (including the removal of a residents gym), internal changes to the layout of Gate 1 and minor external changes to Gate 1.	Application Permitted on 03.08.2016

SITE DESCRIPTION
The application site is located on the northern side of North Street. The site comprises of five storey residential block of flats. The main building consists of timber cladding, rendered walls and an aluminium roof. The site does not fall within a conservation area nor is it positioned within the setting of a listed building.

DETAILED DESCRIPTION OF PROPOSAL
The proposal seeks to remediate the existing walls and roof of the building to non-combustible materials. The development would replace the timber cladding with aluminium cladding, the rendered walls would be changed to similar material with non-combustible insulation. Also, the aluminium roof would be replaced to a similar material with non-combustible insulation.

RELEVANT PLANNING POLICIES
The National Planning Policy Framework (NPPF)

Horsham District Planning Framework (2015):
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
Policy 32 - Strategic Policy: The Quality of New Development
Policy 33 - Development Principles

Horsham District Local Plan (2023-40) (Regulation 19):
Strategic Policy 13: The Natural Environment and Landscape Character
Strategic Policy 19: Development Quality
Strategic Policy 20: Development Principles

Horsham Blueprint Business Neighbourhood Plan 2019-2036
Policy HB4: Design of development

REPRESENTATIONS AND CONSULTATIONS RESPONSES
Where consultation responses have been summarised, it should be noted that Officers have had consideration of the full comments received, which are available to view on the public file at www.horsham.gov.uk

Consultations:
Natural England: Standing Advice: -

It cannot be concluded that existing abstraction within the Sussex North Water Supply Zone is not having an adverse effect on the integrity of the Arun Valley SAC/SPA/Ramsar sites. Developments within Sussex North must therefore must not add to this impact and one way of achieving this is to demonstrate water neutrality. The definition of water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place.

To achieve this Natural England is working in partnership with all the relevant authorities to secure water neutrality collectively through a water neutrality strategy. Whilst the strategy is evolving, Natural England advises that decisions on planning applications should await its completion. However, if there are applications which a planning authority deems critical to proceed in the absence of the strategy, then Natural England advises that any application needs to demonstrate water neutrality.

West Sussex Fire and Rescue Services: Comment. The application is for the replacement of the existing timber cladding material on external walls and within the window units to non-combustible aluminium cladding, replacement of the rendered wall to a similar material with non-combustible insulation, and the replacement of the existing aluminium roof to a similar material with non-combustible insulation**;** providing the replacement cladding and insulation materials used comply with the British Standards requirements and meet with building control requirements for high rise buildings, West Sussex Fire & Rescue Service have no objection to this application.

Building Control: At this stage there is no further information required by ourselves.

The proposal would need to comply with the following requirement:

1. Fire Safety (Approved Document B)

Combustible Materials Ban: The use of non-combustible materials, such as aluminium cladding and insulation, ensures compliance with the Building (Amendment) Regulations 2018.

These regulations mandate that external walls and specified attachments (e.g., cladding, render, window units, roof insulation) of buildings over **18 meters in height** must meet Class A2-s1, d0 or Class A1 (non-combustible) under European fire classification standards.

Even for buildings below 18 meters, fire spread must be managed through careful material selection. Non-combustible materials improve safety and reduce liability.

Wall and Window Units: Replacement of timber cladding and insulation within window units with aluminium and non-combustible materials significantly reduces fire risk and aligns with fire safety guidelines.

Roofing Materials: The replacement of the aluminium roof with a similar non-combustible material and insulation ensures that fire safety is upheld. Roofs must comply with Approved Document B, which outlines the performance requirements for materials used in roofing systems.

2. Structural Safety (Approved Document A)

Support and Fixing: New materials, such as aluminium cladding and non-combustible insulation, must be properly supported and fixed to ensure structural stability. Approved Document A specifies load-bearing requirements and the importance of appropriate fixings to handle wind loads, dead loads, and any imposed loads.

A structural engineer may need to confirm the adequacy of the wall system to support the replacement materials.

Weight of Replacement Materials: Replacing lightweight timber cladding with aluminium and non-combustible insulation may increase the overall load on the structure. Compliance checks are necessary to ensure the existing structure can safely support the weight.

3. Thermal Performance (Approved Document L)

Energy Efficiency: Under Part L (Conservation of Fuel and Power) of the Building Regulations, the thermal performance of the building envelope must meet minimum U-value requirements when replacing cladding, insulation, or roofing:

External Walls: The U-value must not exceed 0.30 W/m²K.

Pitched Roofs: The U-value must not exceed 0.18 W/m²K.

Flat Roofs: The U-value must not exceed 0.18 W/m²K.

Non-combustible insulation must therefore achieve the required thermal performance. Upgrading insulation in rendered walls and the roof presents an opportunity to enhance energy efficiency.

Renovation Trigger: If more than 50% of a thermal element (e.g., external wall, roof) is being replaced, it must comply with current thermal performance standards.

4. Ventilation and Condensation Risk (Approved Document C and F)

Condensation Control: The new cladding and roof systems must prevent interstitial condensation. Non-combustible insulation materials should be vapour-permeable or incorporate vapour barriers as required. Compliance with Approved Document C (Site Preparation and Resistance to Contaminants and Moisture) is necessary.

Ventilation: Ensure sufficient ventilation behind the cladding to prevent moisture buildup. This is critical when replacing rendered walls or timber cladding with aluminium.

5. Weatherproofing (Approved Document C)

The replacement materials must adequately protect the building from rain penetration and weather conditions. Proper detailing, including joints, fixings, and seals, is essential to maintain the building's envelope integrity.

6. Workmanship and Material Standards

Compliance with Standards: Materials must comply with relevant British Standards (e.g., BS EN 13501 for fire performance, BS 8110 for structural safety). Proper installation is critical to achieving compliance.

Aluminium cladding and insulation should be installed following the manufacturer's specifications.

Competent Professionals: Work must be carried out by competent contractors and designers, ensuring compliance with the Building Regulations.

7. Building Control and Approvals

Building Notice or Full Plans Application: For replacement works involving external cladding, rendered walls, or roofs, a Building Control application must be submitted to demonstrate compliance.

The Building Control Body (BCB) will assess the plans, inspect the works, and issue a completion certificate if all requirements are met.

Fire Risk Assessments: Post-replacement, a fire risk assessment (under the Regulatory Reform (Fire Safety) Order 2005) may be required, particularly for multi-occupancy residential buildings.

Representations:
There were no responses received from neighbour consultation.

Parish Comments:
Forest Neighbourhood Council raised an objection as a condition, the application must submit both the materials for which they seek approval AND evidence of the material/s being tested and shown compliant with BS 8414 with testing in accordance with BR135 of the same material. Comply with above conditions, otherwise acceptable.

Member Comments:
None received

HUMAN RIGHTS AND EQUALITY:
The application has been considered having regard to Article 1 of the First Protocol of the Human Rights Act 1998, which sets out a person's rights to the peaceful enjoyment of property and Article 8 of the same Act, which sets out their rights in respect to private and family life and for the home. Officers consider that the proposal would not be contrary to the provisions of the above Articles.

The application has also been considered in accordance with Horsham District Council's public sector equality duty, which seeks to prevent unlawful discrimination, to promote equality of opportunity and to foster good relations between people in a diverse community, in accordance with Section 149 of the Equality Act 2010. In this case, the proposal is not anticipated to have any potential impact from an equality perspective.

PLANNING ASSESSMENT

Character and Appearance

Policy 33 of the Horsham Development Framework seeks to conserve and enhance the natural and built environment developments by ensuring developments make efficient use of land, avoid unacceptable harm to amenity, respect the character of the surrounding area, use high standards of appropriate building materials, retain landscaping where possible (and mitigate loss if necessary) and ensure no conflict with the character of the surrounding town and landscape. Furthermore, policy 33 emphasises that permission would only be granted for developments which ensures the scale, massing and appearance of the development is of high standard of design which relates sympathetically to the host dwelling and the adjoining neighbouring properties.

The proposal seeks to replace the existing timber cladding material on external walls and within the window units to non-combustible aluminium cladding, replace the rendered wall to a similar material with non-combustible insulation, and the replace the existing aluminium roof to a similar material with non-combustible insulation.

It is understood that the aluminium cladding would be of a wood effect material to ensure the visual aesthetic remains the same. Furthermore, the chosen colour is to match the existing building as 'Western Red Cedar' was originally approved under planning permission reference DC/16/0313 and subsequent discharge of condition application reference DISC/16/0015. The proposal would result in like for like similar visual appearance as the existing building. While it is recognised that the material would not weather as naturally as timber, it is not considered that the proposed material would result in such significant visual harm to justify a reason for refusal.

The proposal is considered to be of an appropriate design in keeping with the character and appearance of the existing buildings. Consequently, the proposal would not harm the visual amenity of the wider area.

Amenity Impact

Policy 33 of the Horsham Development Framework aims to ensure that proposals are designed to avoid unacceptable harm to the amenity of the occupiers/users of nearby properties and land.

It is considered that the nature of the proposal comprising of replacement of external materials on an existing building would have limited impact on the amenities of adjoining occupiers.

Water Neutrality

There is no clear or compelling evidence to suggest the nature and scale of the proposed development would result in a more intensive occupation of the dwelling(s)/properties necessitating an increased consumption of water that would 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 grant of planning permission would not therefore adversely affect the integrity of these sites or otherwise conflict with policy 31 of the HDPF, NPPF paragraph 186 and the Council's obligations under the Conservation of Habitats and Species Regulations 2017.

Biodiversity Net Gain (BNG)

Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) mandates that every development must achieve at least a 10% Biodiversity Net Gain (BNG), unless the development qualifies as exempt under the Biodiversity Gain Requirements (Exemptions) Regulations 2024.

The Applicant has demonstrated that the development is exempt from the requirement to achieve a minimum 10% BNG by reason of the development qualifying as 'de minimis' under Regulation 4 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024.

Other matters

No objections were raised at this stage by either Building Control or West Sussex Fire and Rescue Services providing the replacement cladding and insulation materials used comply with the British Standards requirements and meet with relevant building control requirements for high rise buildings.

Conclusions:

The proposal is considered to comply with relevant local and national planning policies and is therefore recommended for approval.

Recommendation: Application Permitted

Conditions:

2 **Standard Time Condition**: The development hereby permitted shall begin before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990.

3 **Regulatory Condition:** The materials to be used in the development hereby permitted shall strictly accord with those indicated on the application form, approved plans, and supporting application documents.

Reason: To enable the Local Planning Authority to control the development in detail in the interests of visual amenity and in accordance with Policy 33 of the Horsham District Planning Framework (2015).

POSITIVE AND PROACTIVE STATEMENT

Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received, in order to be able to, where possible, grant permission.

Plans list for: DC/24/1545
Schedule of plans/documents **approved**:

Plan Type	Description	Drawing Number	Received Date
Floor plan	Proposed Ground Floor Plan	792 CDA XX 00 DR A 20 0109 REV 01-WIP	04.10.2024
Floor plan	Proposed First Floor Plan	792 CDA XX 01 DR A 20 0110 REV 01-WIP	04.10.2024
Floor plan	Proposed Second Floor Plan	792 CDA XX 02 DR A 20 0111 REV 01-WIP	04.10.2024
Floor plan	Proposed Third Floor Plan	792 CDA XX 03 DR A 20 0112 REV 01-WIP	04.10.2024
Floor plan	Proposed Fourth Floor Plan	792 CDA XX 04 DR A 20 0113 REV 01-WIP	04.10.2024
Roof plan	Proposed Roof Plan	792 CDA XX 05 DR A 20 0114 REV 01-WIP	04.10.2024
Location plan		792 CDA Z 00 DR A 00 0100 REV 01	04.10.2024
Elevation plan	Proposed East Elevation	792 CDA Z ZZ DR A 05 0200 REV 01	04.10.2024
Elevation plan	Proposed West Elevation	792 CDA Z ZZ	04.10.2024

		DR A 05 0201 REV 01	
Elevation plan	Proposed North Elevation	792 CDA Z ZZ DR A 05 0202 REV 01	04.10.2024
Elevation plan	Proposed South Elevation	792 CDA Z ZZ DR A 05 0203 REV 01	04.10.2024
Details plan	Proposed Product Details	792 CDA Z ZZ DR A 05 0204 REV 01	04.10.2024

DELEGATED

Case Officer sign/initial Halima Chowdhury Date: 13.01.2025

Authorising Officer sign/initial Guy Everest Date: 22.01.2025