

F.A.O. Case Officer: Meg Bayliss

27 May 2026

Objection to Planning Application Reference: **DC/26/0616**

Address: 82 Bedford Road, Horsham, West Sussex RH13 5BH

Proposal: Erection of a single storey rear extension.

Customer's Address: 3 Waterfield Close, Horsham, RH13 5RR

Dear Ms Meg Bayliss,

I am writing to object to this application on several grounds.

While the application is presented as a rear extension it appears to form part of a wider scheme involving the intensification of the property for use as a House in Multiple Occupation (HMO) alongside development that has already commenced on site.

Works including foundations, slab construction and partial wall construction were apparently undertaken on the assumption that permitted development rights applied. A separate side infill extension has also been constructed.

While planning permission and HMO licensing are separate processes, the resulting layout raises significant concerns regarding residential amenity, overdevelopment and compliance with adopted HMO and parking standards, all of which are material planning considerations.

I therefore request that the proposal is assessed within this fuller context.

In summary, my points expanded on below are:

- Incorrect red-line site boundary and concerns regarding the accuracy of the ownership certificate/application validation
- Overdevelopment of a constrained site resulting in inadequate outdoor amenity space.
- Harm to the character and openness of the rear garden environment.
- Insufficient space for refuse, recycling and cycle storage associated with the proposed level of occupation.
- Increased parking pressure in an area already experiencing significant on-street parking stress.
- Concerns regarding the intensification of the property as a high-occupancy HMO and the resulting standard of residential amenity.
- Poor quality and limited functionality of the proposed communal kitchen/diner.
- Concerns that the side infill extension may not comply with permitted development limitations and may require planning permission.
- Harmful impact on neighbouring amenity at No. 80 Bedford Road through loss of outlook and daylight.

- Concerns regarding compliance with HDC HMO minimum ceiling height standards within multiple rooms.

1 Planning Considerations

1.1 Site Boundary, Ownership and Application Accuracy

The application form provides a Certificate of Ownership – Certificate A indicating that the applicant owns the whole site. However, in the drawing – *LP001 - Proposed OS Map and Location Plan* – the red-line application site boundary (see Fig. 1 below) includes the side and rear passage despite these areas not forming part of the legal site boundary of 82 Bedford Road. As a result, the plot appears substantially larger than it is in reality which understates the impact of the proposed extensions on the remaining outdoor amenity space.

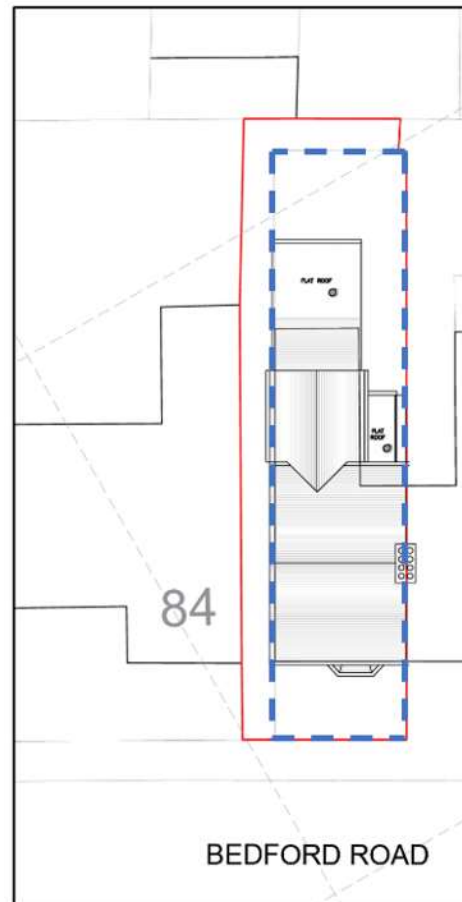
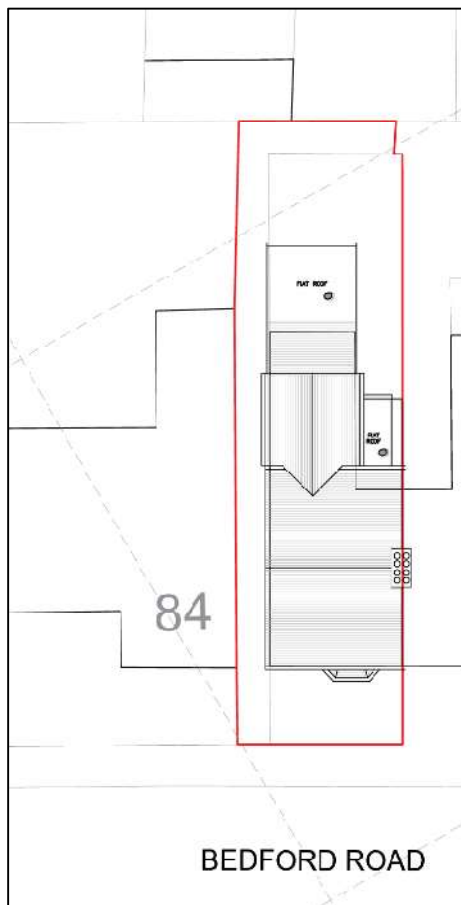


Fig. 1 Proposed Site Boundary - red line Fig. 2 Actual Site Boundary – dashed blue line

When the correct site boundary is applied (see Fig. 2 above – dashed blue line) the amount of remaining garden and amenity space is inadequate for the proposed level of occupancy. This is particularly concerning given the intended high-density occupancy of 6 adults (and

potentially up to 12 adults, see comments below), together with the requirements for refuse and cycle storage which have not been indicated on the drawings.

The proposed rear extension, combined with the side infill extension, would result in a significant loss of outdoor space on an already constrained plot. When viewed against the correct site boundary, the combined scale and footprint of both extensions appear overly dominant and would create a poor standard of residential amenity for future occupants.

The inclusion of land outside the applicant's ownership within the red-line boundary also raises concerns regarding the accuracy of the submitted ownership certificate and whether the application has been correctly validated.

1.2 Impact on Local Character/Overdevelopment of the Site

The proposed rear extension represents a visually intrusive form of development which would fail to respect the private, suburban-garden character of the site itself and the immediate locality. This would be contrary to the design objectives of the *National Planning Policy Framework (NPPF)* particularly paragraphs 130 and 135, which require developments to be sympathetic to local character, including layout, spacing and the relationship between built form and open space.

The rear gardens are individually private and fenced, but because they are enclosed on all sides by the rear of similar houses, they together create a sense of shared openness and greenery. When within a garden, the space feels secluded, but also part of a continuous run of garden areas that gives the impression of openness and greenery despite the built-up nature of the street.

The introduction of a substantial extension would interrupt this sense of continuity and reduce the feeling of openness between gardens. It would make the rear environment feel more enclosed and built-up and would risk encouraging further incremental extensions that could cumulatively alter the character of the area. No rear extensions have been extended as far as this proposal.

Overall, this would be harmful to the perception of space and openness in the rear garden environment, making the area feel more confined, and would also reduce the continuity of green space that currently supports limited wildlife movement between gardens.

1.3 Bin / Recycling and Cycle Storage

No dedicated bin, recycling or cycle storage has been shown on the submitted drawings. It is assumed that this storage would be provided for in the rear garden area.

For a 6-bedroom HMO (proposed occupancy level currently unknown – see below) cycle storage provision would be expected for up to 6 cycles and would need to be secure and covered. In addition, provision would be required for multiple refuse and recycling bins associated with increased occupancy.

The proposed rear extension, together with the side infill extension, would significantly reduce the remaining usable external space available on the site. This would make it difficult

to provide the level of bin and cycle storage reasonably required for such intensity of use without compromising the remaining garden area which would already be inadequate due to the extensions.

As a result, the proposal would lead to an insufficient provision of functional outdoor space for essential operational requirements including refuse and cycle storage further contributing to an overdeveloped and constrained site.

1.4 Pressure on Local Parking

Parking in the surrounding area is already under significant pressure with limited on-street availability and some residents required to park considerable distances from their homes. The majority of properties in the area do not have off-street parking and the proposal provides no additional parking provision.

The application proposes an extension to create an additional double bedroom with ensuite, increasing the overall residential capacity of the property. In the context of potential use as a 6-bedroom HMO, even a single additional bedroom represents a material intensification of residential occupation. The side infill extension already built would also provide an additional double bedroom with ensuite, further increasing this intensity.

It is also noted that each bedroom exceeds 10.22 m² and would therefore meet typical minimum space standards referenced in HDC's HMO standards for accommodating 2 adults per room. While the actual occupancy level is not confirmed, the size and configuration of the accommodation means the property could potentially accommodate a significantly higher number of occupants than its original design intent.

On this basis, there is a realistic potential for corresponding increase in parking demand in an area already subject to high levels of parking stress.

The *Horsham District Council Parking Standards SPD* sets out parking requirements based on use class, occupancy and intensity of development. HMOs typically generate higher parking demand than self-contained dwellings due to multiple adult occupiers and a higher likelihood of independent vehicle ownership. The proposed increase in bedroom provision therefore has a direct and proportionate impact on parking demand.

Given the constrained nature of parking in the area, even the addition of a single bedroom within an HMO context would be likely to exacerbate existing parking stress. The proposal would therefore result in additional parking demand that cannot be provided within the immediate area and would be contrary to the approach set out in the Council's Parking Standards SPD.

2 HMO Licensing / Residential Amenity Considerations

While the application is presented as an additional bedroom, the overall scheme would result in a high-intensity HMO layout. In this context, concerns arise regarding the quality of internal living conditions when assessed against local plan policies, the *Nationally Described Space Standards (NDSS)*, and HDC's *Standards for Houses in Multiple Occupation* all of which

are material considerations in relation to residential amenity. This puts the viability of the proposed bedroom extension in doubt. The overall layout appears focused on maximising bedroom provision within a constrained building footprint, resulting in concerns regarding the quality of shared living accommodation.

2.1 Kitchen / Dining Area – Functional Size and Usability

The sole communal space is the kitchen/dining area, which is intended to serve all occupants as both a cooking and dining space.

HDC's HMO standards indicate a minimum kitchen size of approximately 11.5m² for a 6-person HMO. While the submitted drawings show a kitchen/dining area of approximately 15.01m² this figure does not appear to reflect its effective functional capacity. It is significantly below that required for up to 12 occupants.

The space also accommodates a primary circulation route between the front of the property and the rear bedrooms (Rooms 2 and 3). This through-route reduces the usable area available for cooking and dining activities and limits the practical capacity of the room to function as a shared communal space particularly at busy times with higher occupancy levels.

As a result, the kitchen/dining area would be significantly constrained in terms of its ability to comfortably provide for 6 occupants leading to reduced functionality and poor shared living conditions.

2.2 Kitchen / Dining Location – Quality of Living Environment

HDC's HMO standards state that the kitchen should be:

"...suitably located in relation to the living accommodation, and of such layout and size and equipped with such facilities so as to adequately enable those sharing the facilities to store, prepare and cook food."

The kitchen/dining space is located internally within the building and does not benefit from any external window. This results in a lack of natural light and direct ventilation and has been brought about by the creation of another bedroom in the side infill extension already built.

This results in a poor-quality communal environment that does not provide a comfortable or attractive shared living space. The absence of outlook and natural light further limits the usability of the room as a social space reducing opportunities for interaction between occupants. Occupants are more likely to remain isolated within their individual rooms.

Overall, this represents a reduced standard of communal living accommodation.

2.3 Kitchen Layout – Functionality and Safety

The proposed kitchen layout also raises concerns in terms of practical functionality in a high-occupancy setting.

When dining chairs are in use, circulation space within the kitchen/dining area becomes restricted, limiting the ability for multiple occupants to safely move around the room while cooking or accessing storage. In particular, access to cooking facilities such as ovens and hobs may be impeded when the space is simultaneously in use for dining and circulation.

In practice, this dual use of a constrained space is likely to result in a layout that is difficult to use efficiently and safely at full occupancy, reducing the overall functionality of the communal area and contributing to a lower standard of shared living accommodation.

2.4 Planning Permission Required for Side Infill Extension

The submitted drawings indicate an infill side extension annotated as “3m Extension Under PD”, implying that it is considered to fall within permitted development rights under Class A.

However, there appears to be a discrepancy between the stated assumption of permitted development compliance and the dimensions shown on the submitted plans.

The side wall of the proposed extension, which is located along the shared boundary with No. 80 Bedford Road, appears on drawing P003 – *Proposed Side Elevations* to be approximately 3.27 metres in height (see Fig. 4 below). This is shown in relation to the boundary treatment and existing neighbouring context.

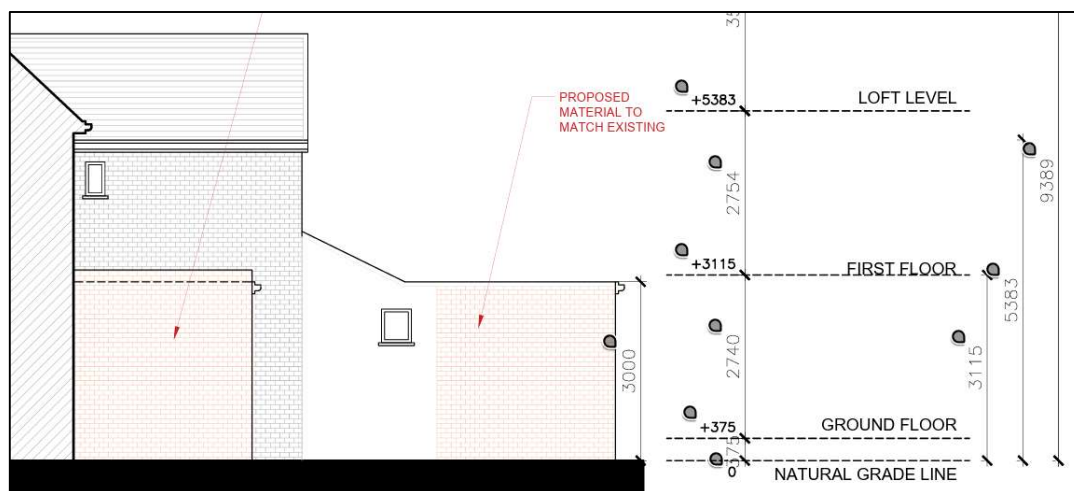


Fig. 4 – Side Elevation showing Side and Rear Extension

Under Class A permitted development rights for single-storey side extensions, the maximum permitted height at the boundary is generally 3 metres. On the basis of the submitted drawings it is therefore unclear how the proposed side extension is considered to fall within permitted development limits.

In addition, it is noted that it is not included for permission in application DC/26/0616 and no separate planning application has been submitted for this element of the development. If the side extension does not fall within permitted development rights, it would require full planning permission as part of the current application.

I therefore request that the Council carefully assesses whether this element of the proposal is lawful under permitted development or whether it constitutes unauthorised development requiring express planning consent.

2.5 Loss of Daylight / Outlook to Neighbouring Property (No. 80 Bedford Road)

The proposed side infill extension has resulted in a harmful impact on the amenity of the neighbouring property at No. 80 Bedford Road, particularly in relation to daylight and outlook.

The side elevation of the extension is positioned along the shared boundary and has created a substantial brick-built wall in close proximity to the neighbouring kitchen window. This has materially reduced the sense of openness currently enjoyed and replaced it with a dominant built form at close range.

As a result, the outlook from the affected window is significantly more enclosed with a corresponding reduction in natural light and a more overbearing sense of enclosure. This has adversely affected the residential amenity of the neighbouring property.

In planning terms, this form of development is contrary to the general design principles set out in the *NPPF* which seek to ensure that development does not result in unacceptable harm to the living conditions of neighbouring occupiers, including through loss of light, outlook, and increased sense of enclosure.

2.6 Rooms 2, 3 & 4 – Floor to Ceiling Height (HDC HMO Standards)

There are concerns that the submitted plans do not accurately reflect the internal floor-to-ceiling heights within Rooms 2, 3 and 4, and that the accommodation may therefore fail to meet HDC's HMO standards requiring a minimum ceiling height of approximately 2.4m.

2.6.1 Room 2

Drawing P002 – *Proposed Floor Plans and Roof Plan* indicates a ceiling height of 2.52m for Room 2. However, this figure does not appear to take into account the lowered ceiling line shown on Drawing P004 – *Proposed Section*, where the rear part of the building (including Room 2 and possibly part of the kitchen area) is shown to have a reduced ceiling level.

When the section drawings are considered and, taking into account floor level changes and structural depth shown on the plans, the effective floor-to-ceiling height in Room 2 appears to be significantly lower than the stated 2.52m. On this basis, the actual floor-to-ceiling height may be materially lower than stated and could potentially fall below the HDC's HMO minimum standards.

2.6.2 Room 3

Room 3, located within the rear extension, is also shown as having a ceiling height of 2.52m on the submitted plans. However, given the roof form and internal section drawings, there is concern that the actual usable ceiling height may be similarly reduced and may fall below the 2.4m standard.

Clarification is therefore required to confirm the true internal ceiling height once structural and roof details are fully considered.

2.6.3 Room 4

Room 4 (incorrectly labelled on the section drawing) is shown as having a ceiling height of approximately 2.26m, which is already below the HDC minimum standard of 2.4m. This represents a clear shortfall in terms of habitable room standards.

2.6.4 Summary of Ceiling Heights

Taken together, the submitted drawings appear to overstate internal ceiling heights in multiple rooms. If confirmed, this would result in substandard accommodation that does not comply with HDC's HMO requirements for minimum internal space standards.

The Council is therefore requested to seek clarification and verification of the actual floor-to-ceiling heights before any assessment of internal living conditions is concluded.

Thank you for reading.

Kind Regards,

[REDACTED]

Cc

Councillor Nick Robbins - New Town [REDACTED]

Councillor Sam Albrow - New Town [REDACTED]

Councillor Jon Olson – Forest [REDACTED]

Councillor David Skipp – Forest [REDACTED]

Councillor Colin Minto - Forest [REDACTED]

Councillor Sam Raby - Cabinet Member for Housing and Communities

[REDACTED]

Councillor Ruth Fletcher - Cabinet Member for Planning and Infrastructure

[REDACTED]