Horsham District Council

DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:
DC/24/1914
The Old Malthouse , London Road, Henfield, West Sussex, BN5 9AD

DESCRIPTION:
Construction of single storey dwelling

RELEVANT PLANNING HISTORY:
None directly relevant to this application.

DESCRIPTION OF THE SITE

The application consists of a two storey detached Grade II Listed Building that lies to the south-west of London Road, and is outside the BUAB . The rear part of the plot is accessed through a private access track and there are a number of outbuildings positioned within the site, including an outbuilding the applicant's describe within their Planning statement as 'the annexe'.

RELEVANT PLANNING POLICIES
The National Planning Policy Framework (NPPF)

Horsham District Planning Framework (2015):
Policy 1 - Strategic Policy: Sustainable Development
Policy 3 - Strategic Policy: Development Hierarchy
Policy 15 - Strategic Policy: Housing Provision
Policy 16 - Strategic Policy: Meeting Local Housing Needs
Policy 24 - Strategic Policy: Environmental Protection
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
Policy 26 - Strategic Policy: Countryside Protection
Policy 31 - Green Infrastructure and Biodiversity
Policy 32 - Strategic Policy: The Quality of New Development
Policy 33 - Development Principles
Policy 35 - Strategic Policy: Climate Change
Policy 36 - Strategic Policy: Appropriate Energy Use
Policy 37 - Sustainable Construction
Policy 38 - Strategic Policy: Flooding
Policy 40 - Sustainable Transport
Policy 41 - Parking

Henfield Neighbourhood development plan 2017-2031
Policy 1 - Henfield Built up area boundary

Paragraph 33 of the NPPF requires that all development plans complete their reviews no later than 5 years from their adoption. Horsham District Council is currently in the process of reviewing its development plan however at this stage the emerging policies carry only limited weight in decision making. As the HDPF is now over 5 years old, the most important policies for the determination of this application must be considered as to whether they are 'out of date' (NPPF paragraph 11d). This

includes, for applications involving the provision of housing, whether the Council can demonstrate a five year supply of deliverable housing sites (NPPF footnote 8).

The Council is currently unable to demonstrate a five year supply of deliverable housing sites, with the supply currently calculated as being 2.9 years. The presumption in favour of development within Paragraph 11d) of the NPPF therefore applies in the consideration of all applications for housing development within the District (unless footnote 7 or Paragraph 14 applies to relevant applications), with Policies 2, 4, 15 and 26 now carrying only moderate weight in decision making.

All other policies within the HDPF as itemised above have been assessed against the NPPF and are considered to be consistent such that they continue to attract significant weight in decision making.

Horsham District Local Plan (2023-40) (Regulation 19):
Strategic Policy 1: Sustainable Development
Strategic Policy 2: Development Hierarchy
Strategic Policy 6: Climate Change
Strategic Policy 7: Appropriate Energy Use
Strategic Policy 8: Sustainable Design and Construction
Strategic Policy 9: Water Neutrality
Strategic Policy 10: Flooding
Strategic Policy 11: Environmental Protection
Strategic Policy 12: Air Quality
Strategic Policy 13: The Natural Environment and Landscape Character
Strategic Policy 14: Countryside Protection
Strategic Policy 16: protected Landscapes
Strategic Policy 17: Green Infrastructure and Biodiversity
Strategic Policy 19: Development Quality
Strategic Policy 20: Development Principles
Policy 21: Heritage Assets and Managing Change within the Historic Environment
Strategic Policy 23: Infrastructure Provision
Strategic Policy 24: Sustainable Transport
Policy 25: Parking
Strategic Policy 27: Inclusive Communities, Health and Wellbeing
Strategic Policy 37: Housing Provision
Strategic Policy 38: Meeting Local Housing Needs
Policy 39: Affordable Housing
Policy 40: Improving Housing Standards in the District

Planning Advice Notes:
Facilitating Appropriate 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:
Archaeology: No objection. The site is to the east of an Archaeological Notification Area-DWS8960-Bottings Farm Medieval Historic Farmstead, Henfield and so is outside of the identified area of the historic farmstead that forms the focus of the ANA. In addition the proposed development is not large and so I do not consider that the proposals are likely to impact upon significant archaeological remains.

Drainage Consultant: The site, and location of the proposed dwelling, falls within Flood Zone 3. Upon review of guidance contained within the Horsham District Council Level 1 Strategic Flood Risk Assessment (2024) and flood extent data provided from the Adur Eastern Branch Updated Climate Change Allowances Model, the site is indicated to fall within Flood Zone 3b. In accordance with Planning Practice Guidance: Flood Risk and Coastal Change, Table 2, residential development, classified as 'More Vulnerable', should not be permitted in FloodZone 3b, which is classified as a

functional floodplain. Safe vehicular access and egress is not provided to the property in the design flood event, as required to comply with Planning Practice Guidance. Therefore Object.

In addition, note additional information would be required in respect of surface water drainage, SuDs and foul drainage.

Environmental Agency: We object to the proposed development as it falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located. The application is therefore contrary to the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).

HDC Aboriculture: No objection, subject to conditions. On site observations confirm that if the current extent of roadside tree screening were to be retained, then the loss of internal planted trees associated with the logistical undertaking of the development and creation of an appropriately sized amenity area would not be of wider landscape significance.

HDC Conservation & Design: Object: -

The group of listed buildings at the junction of the A281 and the River Adur illustrates the importance of this ancient intersection of routeways. A bridge was first recorded in 1296 probably replacing a ford. The VCH mentions Mock Bridge wharf as a significant transport hub with various businesses and industries until the nineteenth century.

The proposal is neither inspired nor inspiring. It is reminiscent of a utilitarian storage building or bunker in spite of the specious timber cladding. It displays none of the inventiveness or flair of the International style dwellings it is trying to emulate. The assertion the building is of high quality construction and appearance and has been sensitively designed is not qualified in the design and access statement and is not a view I share.

The heritage statement, at para.4.12, describes the proposed dwelling as in, *"a style that reflects the historic former smallholding and responds to it architecturally."* This is not understand when the proposed dwelling is clearly reflective of functional design and shares none of the vernacular proportions, detailing or materials of the neighbouring historic buildings.

It is hard to agree that, "The development of the proposed site would not bring about a notable change in character of the existing land …." (Para 5.7 of the Heritage statement) A building of this size will clearly have a far greater impact than a tennis court such that the character of the land will change. The incongruity of the existing design in this context will draw even greater attention than a single storey building that truly reflects this context.

The existing proposal will result in less than substantial harm in the middle of that scale due to inappropriate design.

HDC Environmental Health: Comment, conditions recommended.

Natural England: No objection subject to the delivery, management and maintenance of any measures identified in the applicant's water neutrality statement that are required to ensure that the proposed development will not result in increased levels of abstraction within the Sussex North Water Supply Zone.

Nature Space: Objection. An ecological report has been submitted with this application, it recommends undertaking further surveys to identify presence or absence of great crested newts.

Southern Water: General comments made regarding advice should new sewers and soakaways be included in the proposal

WSCC Highways: The LHA does not consider that this proposal would have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network,

therefore is not contrary to the National Planning Policy Framework (paragraph 116), and that there are no transport grounds to resist the proposal.

Representations:
None received

Parish Comments:
Objection, the application is contrary to the following HDPF policies: -

- 32 as it does not complement the distinctive characters and heritage of the area
- 33.2 as there is loss of amenity to the neighbouring property; or the design is not sensitive to surrounding buildings
- 34 as it does not preserve the locally distinctive vernacular building forms and their settings, features, fabric and materials.
- 38 as it does not demonstrate proposals will follow a sequential approach to flood risk management without increasing flood risk elsewhere. The Parish Council is extremely concerned at the levels of flooding prevalent in this location. The site is in Flood Zone 3, the adjacent road (A281) is closed annually due to flooding from the River Adur.

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

Principle of Development:

The application is located outside of the designated built-up area boundary and is therefore within a countryside location. The application site lies approximately 1km away from Henfield which is classed as a ‘medium village’ within the HDPF, with a moderate level of services and facilities.

Policy 2 of the Horsham District Planning Framework (HDPF) sets out the main growth strategy, focusing development in the main settlements. The application site is situated outside of any of the defined settlements as categorised under Policy 3 of the HDPF, and therefore is considered to be in a countryside location in policy terms.

Policy 4 of the HDPF outlines that the expansion of settlements outside the built-up area are supported where the site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge; the level of expansion is appropriate to the scale and function of the settlement type; the development is demonstrated to meet the identified local housing needs; the impact of development individually or cumulatively does not prejudice comprehensive long term development; and the development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced.

The HDPF outlines that the proposed settlement hierarchy is the most sustainable approach to delivering housing; with new development focused in the larger settlements of Horsham, Southwater

and Billingshurst; with limited new development elsewhere, only where it accords with an adopted Neighbourhood Plan. Specifically, Policy 3 of the Horsham District Planning Framework seeks to retain the existing settlement pattern and ensure that development takes place in the most sustainable locations as possible. The site is located outside any of the District's defined built-up area boundaries (BUAB) and does not form part of Horsham's adopted development plan. As a result, residential development in this location would conflict with the requirements of Policy 4 and would not usually be considered acceptable in principle.

In this countryside location, the proposal is also considered against Policy 26 which seeks to protect the countryside against inappropriate development unless it is considered essential and appropriate in scale; whilst also meeting one of four criteria. The criteria includes: supporting the needs of agriculture or forestry; enabling the extraction of minerals or the disposal of waste; providing for quiet informal recreational use; or enabling the sustainable development of rural areas. The proposed development does not meet any of this criteria, nor is it considered to be essential to the countryside location and does not therefore comply with Policy 26 of the HDPF.

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

The proposed dwelling would be not linked to a rural use and is not essential to its countryside location, therefore being contrary to Policy 26 of the HDPF and not be in accordance with the overarching spatial strategy for development as set out in Policies 3 and 4 of the HDPF. It is therefore considered to be contrary to the spatial strategy and principles of the National Planning Policy Framework and Local Development Plan.

Character, Appearance and Heritage:

Policies 25 and 26 of the HDPF seek to protect the natural environment and landscape character of the District, including the landform, development pattern, together with protected landscapes and habitats. Development will be required to protect, conserve and enhance landscape and townscape character, taking account of areas or features identified as being of landscape importance, individual settlement characteristics and settlement separation.

Policies 32 and 33 of the HDPF require development to be of a high standard of design and layout. Development proposals must be locally distinctive in character and respect the character of their surroundings. Where relevant, the scale, massing and appearance of development will be required to relate sympathetically with its built-surroundings, landscape, open spaces and to consider any impact on the skyline and important views.

Policy 34 of the HDPF recognises that heritage assets are an irreplaceable resource and, as such, seeks to sustain and enhance the historic environment through the positive management of development affecting heritage assets. Applications affecting heritage assets should *inter alia* make reference to the significance of the asset(s) affected by development, reinforce the special character of the historic environment through development of an appropriate siting, scale and design and ensure that development makes a positive contribution to the character and distinctiveness of the area.

The group of listed buildings at the junction of the A281 and the River Adur illustrates the importance of this ancient intersection of routeways. A bridge was first recorded in 1296 probably replacing a ford. The VCH mentions Mock Bridge wharf as a significant transport hub with various businesses and industries until the nineteenth century.

The site has a distinctive rural character in part because of its close proximity to the existing Grade II listed building and openness arising from the separation of buildings and wider views into the countryside. The proposed dwellinghouse would have a clear increase in built form over the existing site circumstance, and would have a greater visual impact on the countryside given the extent of the built footprint which is unacceptable in scale when considering the existing built form on site.

The proposed building is considered to be of an incongruous scale and form, with this resulting in harm to the character of the site itself as well as the character of the wider area. The proposal would entail utilitarian design that would be at odds with its surrounding context. The proposal would therefore result in an unacceptable impact on the setting of the Grade II listed building, with the proposal representing less than substantial harm in the middle of that scale due to inappropriate design.

Flooding:

Policy 38 of the HDPF states that development proposals must follow a sequential approach to flood risk management, giving priority to development sites with the lowest risk of flooding, which make required development safe without increasing flood risk elsewhere. Development proposals must seek to ensure that ensure that most vulnerable uses, inclusive of residential development, are placed in the lowest risk areas and avoid the functional floodplain except for water-compatible uses and essential infrastructure. Development within Flood Zones 2 and 3 will only be deemed acceptable upon completion of a sequential and exception test, and should be supported by a site-specific Flood Risk Assessment.

Paragraph 170 of the NPPF outlines that Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where 50 development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

Whilst the scale of the development is not of such a size that the Lead Local Flood Authority would wish to comment on, they have commented that development within Flood Zone 3b is not permitted, with the proposed development being within a functional floodplain. Development within this flood zone should not be permitted according to table 2 of the PPG which outlines that if the development is essential infrastructure that has passed the exceptions test and water compatible use, should be designed to remain operational and safe, not result in loss of floodplain storage and not impede water flows and not increase flood risk elsewhere. The application site is however not essential infrastructure.

The Environmental Agency have commented that they would object to the development as they note that the proposal would be inappropriate in the flood zone in which it is located. The application has not adequately demonstrated that the development would not be available within a lower risk area of flooding and given the objection from Environmental Agency and advice from the Lead Local Flood authority, it has not been satisfactorily demonstrated that the application would not be at risk of flooding, that the mitigation measures are sufficient to overcome concerns of the Environmental Agency or that it would not increase the risk of flooding elsewhere.

Residential Amenity:

Policy 32 of the HDPF states that development will be expected to provide an attractive, functional, accessible, safe, and adaptable environment that contributes a sense of place both in the buildings and spaces themselves. Policy 33 continues that development shall be required to ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land.

Policy 33(2) of the HDPF states that development should be designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land, whilst having regard to the sensitivities of surrounding development.

Given the distance between the proposed development which is of a low height, the existing dwellinghouse and the nearest residential dwellings, there are no objections in regards to loss of light or obtrusive appearance such that the proposal would not result in harm to the amenities of the neighbouring properties. Furthermore, the proposal is significant in footprint and would be sufficient to be in accordance with Nationally Described space standards. The proposal given it is limited in height, would not result in an unacceptable impact to the privacy of the neighbouring dwellings. Overall, the proposal would not result in an unacceptable impact on the amenities of existing of nearby neighbouring properties such that the development would be acceptable in light of policy 33(2).

Highways Impacts:

Policy 40 of the Horsham District Planning Framework states that transport access and ease of movement is a key factor in the performance of the local economy. The need for sustainable transport and safe access is vital to improve development across the district.

Policy 41 of the HDPF states that development should provide safe and adequate parking, suitable for all anticipated users.

The proposal would use an existing access to the site, with the scale of the development not resulting in a significant increase in the use of the access. The proposal would retain the existing garage on site and would have sufficient parking provision on site such that would accommodate for the required parking. Highways have been consulted during the course of the application and have no objections to the proposal in light of highways concerns.

Ecology:

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

Circular 06/2005 identifies that the presence of protected species is a material consideration when considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Therefore, it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed application, is established before planning permission is granted. Information on biodiversity impacts and opportunities should inform all stages of development, and an ecological survey is usually necessary where the type and location of development are such that he impact on biodiversity may be significant and existing information is lacking or inadequate.

The Ecology report submitted outlines that the presence of foraging/commuting habitats are moderate. Nevertheless, the bar roost tree assessment outlined that the nearby trees to the proposed development would have a negligible potential to support bat roosts. In regard to the amphibian assessment, the potential would be low to moderate depending on the species. There is moderate nesting bird potential. Overall, given that there are no habitat features on site such that further surveys would not be required, however given that there is moderate potential for commuting bats, conditions would be required to restrict lighting and to prevent the loss of trees on site such that the development would not result in an unacceptable impact to protected species.

Water Neutrality:

The application site falls within the Sussex North Water Supply Zone as defined by Natural England which draws its water supply from groundwater abstraction at Hardham. Natural England has issued a Position Statement for applications within the Sussex North Water Supply Zone which states that it cannot be concluded with the required degree of certainty that new development in this zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites.

Natural England advises that plans and projects affecting sites where an existing adverse effect is known will be required to demonstrate, with sufficient certainty, that they will not contribute further to an existing adverse effect. The received advice note advises that the matter of water neutrality should be addressed in assessments to agree and ensure that water use is offset for all new developments within the Sussex North Water Supply Zone.

The dedicated Water Neutrality statement outlines that the existing baseline use would be 0 litres per day given the existing use of this part of the site. The proposed development would use be for a three bedroom dwellinghouse with an occupancy rate of 2.47 people. The expected figure of 110 litres per person per day and would therefore result in a usage of 271.7 litres per day for the whole site. They aim to reduce the consumption through efficient fixtures and fittings in the first instance to result in

89.04 litres per person per day. Overall when accounting for the proposed occupancy this would result in 219.03 litres per day. The proposed mitigations included would be to supply the entire proposed use with a rainwater harvesting system.

They have done their own calculations for the rainwater harvesting system but assumed a higher yield coefficient than the local authority would use because of the pitch of the roof which would collect less rainwater than their assumption. As such, a yield co-efficient of 0.5 rather than 0.8 is used which results in a lower figure than they have assumed. To work out rainwater yield we would use the following equation:

Yr = A x e x AAR x H

Where:
Yr = rainwater yield (in litres)
A = collection area (330m2)
e = yield coefficient (of 0.5)
AAR = area annual average rainfall (of 829)
h = hydraulic filter efficiency (of 0.9)

This would collect 1123,106.5 litres per annum which when divided by the daily usage (365 days) would be a collected provision of 337.27 litres per day. The storage tank would need to be in excess of the 35 day supply in case of drought in excess of the daily so the daily requirement x 35 days = 7,697.55 litres. From the submitted details, the proposal would be water neutral given that the collected rainwater volume would be in excess of the water used within the development. Environmental Health have no objections to the proposal subject to the inclusion of a condition regarding the quality of the water supply being potable. Further details on filtration of the water to determine the quality of the water could be provided as a pre-commencement condition. Subject to the inclusion of this condition, there are no objections to the proposal with the development leading to a water neutral proposal.

Climate Change:

Policies 35, 36 and 37 require that development mitigates to the impacts of climate change through measures including improved energy efficiency, reducing flood risk, reducing water consumption, improving biodiversity and promoting sustainable transport modes. These policies reflect the requirements of Chapter 14 of the NPPF that local plans and decisions seek to reduce the impact of development on climate change. The proposed development, if permitted would include conditions to ensure that certain climate mitigation measures were met. These would pertain to:

- Integration of SUDS and green infrastructure to manage flood risk
- Requirement to provide full fibre broadband site connectivity
- Dedicated refuse and recycling storage capacity
- Cycle parking facilities
- Improved pedestrian and cycle links
- Electric vehicle charging points
- Air quality mitigation strategy

Subject to these conditions the application will suitable reduce the impact of the development on climate change in accordance with local and national policy.

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) and that every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition that development must not be begun unless a Biodiversity Gain Plan has been submitted to the planning authority and the planning authority has approved the Plan.

The application form states that the development would be a self-build development and as such would be exempt from Biodiversity net gain requirements. This would need to be ensured were the application to be approved.

Conclusions:

The site is within the countryside in a location not allocated for development within the HDPF or a made neighbourhood plan, owing to the site's location outside of the built-up area boundary, the principle of the development is contrary to Policies 1, 2, 3, 4 and 26 of the Horsham District Planning Framework.

As the development has been shown to be water neutral, and on the basis of the Council's lack of 5-year housing land supply, the presumption in favour of sustainable development at paragraph 11(d) of the NPPF is engaged in this instance. Paragraph 11(d)(ii) states that where there are no relevant development plan policies in place, the policies that are considered most important for the determination of applications (in this case, Policies 1, 2, 4 and 26 of the HDPF, owing to the lack of a five-year housing land supply) permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole.

In circumstances where Paragraph 11(d) is engaged, weight can be given to the most important policies for determining an application according to their degree of consistency with policies in the Framework. However, the Framework does not prescribe the weight to be given to conflict with development plan policies. This is affected by the purpose of the policy and the circumstances of the case.

In this case the most important policies include those relating to the spatial development strategy as set out at HDPF Policies 1, 2, 3 and 4. Policy 1 reflects the Framework presumption in favour of sustainable development and is thus fully consistent with the NPPF. Policies 2, 3 and 4 set out how sustainable growth will be achieved, though as they seek to focus development within settlements and only allow expansion on allocated sites, they have a restrictive element. Nonetheless, they generally reflect the Framework preference for development to be well located in relation to services and facilities. Therefore, moderate weight is applied to these policies.

HDPF Policy 26 refers specifically to countryside protection outside built up area boundaries, requiring development to be essential to this location. Whilst again this reflects the Frameworks preference for development to be well located in relation to services and facilities, as the definition of built-up areas is based on out-of-date housing numbers, this policy is afforded moderate weight.

As per the preceding sections of this this report, the granting of this permission would conflict with Policies 1, 2, 4 and 26 of the HDPF. Whilst the proposed would not support the spatial strategy for the District, these policies are not fully framework compliant. Furthermore, given the Council's current five-year housing land supply situation only moderate weight is applied to these policies in the overall planning balance.

The proposal would provide for one market dwelling. As above, as the Council cannot currently demonstrate a five-year housing land supply, the provision of an additional dwelling towards this supply is afforded *significant* weight. However, the Council considers that this benefit would be *limited* given the negligible overall contribution to the supply.

The proposal's ability to demonstrate an no adverse amenity impact, safe access and suitable parking and water neutrality are not considered benefits to the scheme but would rather be necessary to demonstrate compliance with local planning policies. No other discernible benefits have been identified that would weigh in favour of granting permission.

The Facilitating Appropriate Development (FAD) document was endorsed at Full Council on 19 October 2022. The FAD recognises that the Council is likely to receive applications outside of defined BUABs and on unallocated sites (such as this proposal) as it is unable to demonstrate a five-year housing land

supply. Given this position and the principles behind HDPF Policy 4, it will consider positively applications that meet *all* of the criteria:

- The site adjoins the existing settlement edge as defined by the BUAB;
- The level of expansion is appropriate to the scale and function of the settlement the proposal relates to;
- The proposal demonstrates that it meets local housing needs or will assist the retention and enhancement of community facilities and services;
- The impact of the development individually or cumulatively does not prejudice comprehensive long-term development; and
- The development is contained within an existing defensible boundary and the landscape character features are maintained and enhanced.

While the current housing shortfall is a material consideration of significant weight, and the site does adjoin the settlement edge, and the contribution of one market dwelling would bestow socio-economic benefits in the form of housing delivery, the site is not adjacent to nor adjoining an existing settlement edge therefore, the proposal would not benefit from the provisions of the FAD as above.

Furthermore, given that the development is within a functional Floodzone (3b) the proposal would be at an unacceptable risk of flooding ad it has not been demonstrated that the proposal is in accordance to paragraph 170 of the NPPF with the type of development being 'more vulnerable' as a dwellinghouse. The lack of acceptability in this regard would disengage the presumption in favour of sustainable development where the application site is not considered to be in a sustainable location with regards to flooding.

The cumulative benefits (the provision of one market dwelling (limited weight) and the socio-economic benefits (moderate weight) would be outweighed from the identified adverse impacts of the development. Therefore, the proposal is recommended for refusal.

Recommendation: Application Refused

Reason(s) for Refusal:

1. The development would enable a residential use within a countryside location outside of the built-up area boundary of any settlement, on a site which has not been allocated for development within the Horsham District Planning Framework or an adopted Neighbourhood Plan. The development would be contrary to the overarching strategy and hierarchical approach of concentrating development within the main settlements and is not essential to its countryside location. There are no material considerations which outweigh this harm, and the proposal represents unsustainable development, contrary to Policies 1, 2, 4, and 26 of the Horsham District Planning Framework (2015).

2. It has not been demonstrated to the satisfaction of the Local Planning Authority, in the absence of a sufficient Flood Risk Assessment and Drainage Strategy, that the proposal would not result in an increased flood risk, such that there is uncertainty with regards to Flood management such that the proposal would be contrary to Policy 38 of the Horsham District Planning Framework (2015).

3. The development, by reason of its siting, form and design, would represent an incongruous and unsightly feature which would adversely impact on the setting of neighbouring heritage assets and the character and appearance of the wider surrounding countryside location. The development would result in less than substantial harm to the significance of heritage assets, with no public benefit identified which would outweigh this level of harm. The development is therefore contrary to Policies 32, 33 and 34 of the Horsham District Planning Framework (2015) and the National Planning Policy Framework.

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/24/1914

(The approved plans will form Condition 1 on the Decision Notice of all Permitted applications)

Schedule of plans/documents **not approved**:

Plan Type	Description	Drawing Number	Received Date
Supporting Statement	Flood Risk Assessment	C3470	06.02.2025
Site plan	Existing	EX-01	10.12.2024
Site plan	Proposed	PL-01 REV B	10.12.2024
Floor plan	Proposed	PL-02 REV A	10.12.2024
Elevation plan	Proposed	PL-03 REV A	10.12.2024
Section plan		PL-04 REV A	10.12.2024
Supporting Statement	Heritage	none	10.12.2024
Supporting Statement	Preliminary Ecological Appraisal	none	10.12.2024
Supporting Statement	Water Neutrality	C3470	10.12.2024
Design & Access Statement	and Appendix 1 and 2	none	10.12.2024
Photos	Appendix a - Landscape Appraisal	none	10.12.2024
Photos	Appendix b - Landscape Appraisal	none	10.12.2024
Plans	Viewpoint Locations	Fig 1	10.12.2024
Photos	Viewpoint Locations Aerial	Fig 2	10.12.2024
Layout plan	Landscape Layout	RCo540 / 01 REV 02	10.12.2024
Supporting Statement	Landscape Appraisal	RCo540 REV 01	10.12.2024
Location & Block plan		LB-01	10.12.2024

DELEGATED

Case Officer sign/initial Hannah Darley Date: 25th March 2025

Authorising Officer sign/initial Guy Everest Date: 03.04.2025