SQUIRES PLANNING
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HORSHAM DISTRICT COUNCIL
Albery House,
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Horsham,
West Sussex
RH12 2GB

06 August 2026

Dear Alice Johnson,

THE GHYLL, PEVENSEY ROAD, SOUTHWATER, WEST SUSSEX, RH13 9XZ
APPEAL REF: APP/Z3825/W/26/3377435
FULL AWARD OF COSTS - QUANTIFIED CLAIM

We act for Mr Andy New, acting for Southwater Ghyll CIO. We refer to the Inspector's Costs Decision dated 18 May 2026. The Inspector allowed a full award of costs against Horsham District Council and ordered the Council to pay Mr New the costs of the appeal proceedings, such costs to be assessed in the Senior Courts Costs Office if not agreed.

In accordance with paragraphs 11 and 12 of the Costs Decision, this letter provides the details of those costs. Copies of the Costs Decision, the relevant invoices, and the supporting time records are enclosed.

The total sum claimed from Horsham District Council is [redacted]. This represents the professional costs incurred, excluding VAT. The associated VAT of [redacted] is recoverable by Southwater Ghyll CIO from HMRC and does not, therefore, form part of this claim.

Schedule of costs

The schedule below identifies each supplier, the appeal-related work undertaken, and the amount claimed. No uplift, interest, wider project loss, or compensation for delay is included.

Provider / invoice	Appeal work	Net	VAT *(recoverable and not claimed)*	Gross
Squires Planning INV251365 28 Feb 2025	Fixed-fee review of appeal prospects. This was preliminary appeal advice, and not related to the planning-application which we were not involve with.	[redacted]	[redacted]	[redacted]
Squires Planning INV269415 31 July 2026	137.80 hours of professional planning work, covering preparation of the appeal statement and appendices, submission management, liaison with the Council, Planning Inspectorate, and project team, review of the Council's case and third-party representations, final comments, conditions, etc.	[redacted]	[redacted]	[redacted]
Aardvark Planning Law 001889 30 Jan 2026	77 hours 24 minutes at reduced fees for the section 106 agreement required to secure biodiversity net gain and enable the appeal to be determined.	[redacted]	[redacted]	[redacted]

Offices in Swindon & Crawley.
Squires Planning is the trading name of Squires Planning Ltd.
The company is registered in England & Wales with Company Number 11917764.
The registered office is Home Farm, Purley on Thames, Reading, Berkshire, RG8 8AX.

Provider / invoice	Appeal work	Net	VAT *(recoverable and not claimed)*	Gross
S&C Slatter Ltd 13142 31 Jul 2026	Appeal-specific technical work: submission record, team meetings, appeal statement comments, BNG coordination, and drawings. Issued after the decision, but covering work from 21 July 2025 to 15 January 2026.	[redacted]	[redacted]	[redacted]
	TOTAL CLAIM	[redacted]	[redacted]	[redacted]

Basis and reasonableness of the claim

The Planning Practice Guidance confirms that a full award covers the receiving party's whole costs for the statutory process, including the appeal statement, supporting documents, and costs application. Eligible costs can include preparatory work before the appeal was lodged where it relates directly to the appeal. This claim is confined accordingly.

Squires Planning's fees cover the initial appeal-prospects review and the work needed to prepare, submit, and conduct the appeal. The records show 137.80 time-based hours, in addition to the £500 fixed-fee review, covering the statement and appendices, submission, the Council's case and third-party representations, final comments, conditions, project management and progressing the appeal.

Aardvark Planning Law prepared the section 106 mechanism needed to secure biodiversity net gain for the appeal scheme. An executed obligation was required for this written-representations appeal. The invoice records 77 hours 24 minutes but applies reduced fees of £10,500 net. The work was necessary to present a complete and determinable appeal case.

S&C Slatter's supporting record identifies the personnel, dates, activities, and rates for its appeal-specific work, including collation of the submission record, meetings, appeal statement comments, BNG coordination, and drawings.

The invoices are addressed to Southwater Ghyll CIO because it met, or is liable for, the professional costs incurred by Mr New in pursuing the appeal on its behalf. They relate to the same appeal proceedings identified in the Costs Order.

Southwater Ghyll CIO is VAT registered and has confirmed, following advice from its accountant, that it is entitled to recover the VAT charged on the professional costs relating to the appeal. The VAT shown in the enclosed invoices has therefore been excluded from the amount claimed from Horsham District Council. The gross invoice amounts are included in the schedule for transparency only.

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Agreement and payment

Please confirm within 21 days of the date of this letter that the Council agrees the sum of [redacted]

If any item is not agreed, please identify the specific amount disputed and provide the Council's reasons and any counterproposal within the same period, so that the parties can seek to narrow and resolve any outstanding issues promptly.

Once the amount is agreed, please confirm the Council's process for obtaining the payee and bank details required to arrange settlement.

We trust that agreement can be reached without the need for detailed assessment. If it cannot, our client reserves all rights under the Costs Order, including the right to apply to the Senior Courts Costs Office.

Yours sincerely,

[redacted]

Andrew Metcalfe
Managing Director | MPlan (Hons) MRTPI
[redacted]

Enclosures:

- *Costs Decision;*
- *Squires Planning invoices INV251365 and INV269415 with supporting time log and notes;*
- *Aardvark Planning Law invoice 001889 with supporting time ledger; and*
- *S&C Slatter Ltd invoice 13142 with supporting time record.*

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