

Lock House, Lock Lane, Partridge Green RH13 8EG

Application DC/26/0924: Erection of a coach house for use as holiday-let accommodation

Applicant's response to consultee comments

For the attention of: Bethan Tinning, Planning Officer, Horsham District Council

Date: 28 September 2026

Dear Bethan,

1. Introduction

1.1 This letter responds to the Conservation Officer's consultation response of 25 September 2026. It also responds to the Arboricultural Officer's comments of 26 August 2026, which were passed on in your email of 2 September. I would be grateful if it could be placed on the public file and taken into account before determination.

1.2 In summary:

- The Conservation Officer now accepts the design, form, scale and siting of the building. His objection rests solely on the perceived effects of holiday-let use.
- The effects he describes are not proposed. The building has no private garden or curtilage, and guests use the estate's existing communal facilities. Any residual concern can be controlled by condition.
- On 7 January 2026 the Planning Inspectorate considered the significance and setting of Lock House in detail. That decision directly undermines the Conservation Officer's reasoning.
- Contrary to the Conservation Officer's statement, the proposal delivers clear public benefits. The Council has itself previously acknowledged them, and they are supported by local businesses.
- The 15–18m ancient woodland buffer will remain semi-natural, with no access, garden, surfacing or lighting. A woodland management plan has been submitted to the Forestry Commission.

2. The design is agreed

2.1 The conservation objections to the earlier application, DC/25/1881, concerned design and the level of detail. The current scheme addresses both.

2.2 The Conservation Officer now accepts that the building "is reflective of a country house stable block and is similar in scale and position to a building granted permission in 2016" (DC/14/2134). He also accepts that a building of this nature "may still respect and respond to the principal building in its rural setting".

2.3 He further agrees that there is no physical impact on the listed building, so the listed building consent application DC/26/0925 can be withdrawn.

2.4 Siting, scale, form, massing and architectural treatment are therefore not in dispute. The only remaining objection is that holiday-let use would "clearly advertise it as a residence". The Conservation Officer attributes this to car parking, outdoor recreation areas with hardstanding, artificial lighting and domestic detritus. He concludes that this would "dilute an appreciation of the primacy of the country house". He also asserts that there are no public benefits.

3. The Inspector's findings on the significance and setting of Lock House

3.1 In appeals APP/Z3825/W/25/3359623 and APP/Z3825/Y/25/3359626, the Inspector allowed the conversion of Lock House into five dwellings and of the garage block into a further dwelling. The decision is dated 7 January 2026. It is the most recent independent assessment of the heritage asset, and I ask that it be given significant weight.

3.2 The Inspector found that the building's significance derives from "its vernacular revival country house appearance in its parkland setting and internal finishes" (para 8). The present proposal does not affect the building's appearance or its internal finishes. The only question is its effect on the parkland setting.

3.3 On paraphernalia, the Inspector accepted that subdivision would produce more residential paraphernalia around the house. He found that this would only affect the parts closest to the house, and that "the relationship to the wider parkland that serves the house would be retained" (para 15). The coach house site is some 230m away, screened, and on lower ground. It would introduce no private garden and no paraphernalia at all.

3.4 On a converted outbuilding used as a dwelling, the Inspector considered the garage block, which is being converted into a separate dwelling close to the front of Lock House. He found that it would "remain subservient to the main house". He also found that, being separated by mature planting, it "would not affect the setting of Lock House as a large country house within a parkland setting" (para 16).

3.5 That finding answers the Conservation Officer's central point. A residential use in an estate outbuilding does not, in itself, harm the setting of Lock House. What matters is the building's subservience, appearance and separation. The Conservation Officer has accepted all three here. The garage block is nearer to Lock House, more visible from it, and used as a permanent dwelling. The coach house is further away, screened, lower, and in holiday-let use without a private garden.

3.6 On harm and benefits, the Inspector found that subdividing the house itself caused harm "at the lower end of less than substantial harm". He concluded that this was outweighed by public benefits (paras 17–21).

3.7 On the estate's future, the Inspector found that use as a single dwelling is not viable (para 19). Lock House is therefore no longer a single country house whose occupants would keep horses in a private stable block. It is a multi-occupancy estate with shared grounds and facilities. The Conservation Officer's reasoning assumes the former. The lawful and realistic position is the latter.

4. The proposal is not a conventional dwelling

4.1 The building is holiday-let accommodation, and the applicant accepts a condition restricting it to that use. There is no private garden, curtilage or amenity space. Guests use the facilities already provided across the Lock House estate: the swimming pool, the tennis court, and some 20 acres of communal grounds, which the Inspector's landscaping and management conditions already govern.

4.2 The building will therefore not generate the separate garden, sheds, play equipment, washing lines, trampolines and outdoor furniture that the Conservation Officer anticipates. For clarity, the reference in section 2 of the Ancient Woodland Buffer Zone Management

Statement to gardens being located to the east of the building should be read as referring to the estate's communal grounds. No private garden is proposed.

5. Each effect identified by the Conservation Officer is either not proposed or controllable

5.1 Government policy requires local planning authorities to consider whether otherwise unacceptable development could be made acceptable through conditions. The applicant considers the proposal acceptable without conditions. Even so, each matter raised can be secured by condition, as follows.

5.2 *Appearance and light from the building.* The west elevation will be seen from the drive. From there, people will see the upper, glazed leaves of the timber stable doors and the first-floor dormers. That is exactly how a traditional country house stable block or coach house presents itself.

Such buildings were routinely built with grooms' and coachmen's accommodation in the roof space, lit at night. The stables below would be lit during early and late feeding and mucking out. Seeing light from a stable block at night on a country estate is expected, not incongruous.

The Conservation Officer accepts a stable block in this position. Its use would bring the same lighting, and more activity. The building's entrance has also been moved to the east elevation (amended plans, 28 August 2026). Arrivals and departures will therefore take place away from the drive and the woodland edge.

5.3 *Car parking.* Four spaces are provided on grasscrete, a permeable surface that reads as grass. They are enclosed by a yew hedge so that parked cars are screened from the drive. The March 2026 conservation comments on DC/25/1881 criticised the provision of too few spaces. The applicant has therefore provided a modest, screened and soft-surfaced parking area, not an expanse of hardstanding. A condition can fix the layout and require the hedge to be kept.

5.4 *Outdoor recreation areas and hardstanding.* None are proposed. Recreation is provided by the estate's existing communal pool, tennis court and grounds.

5.5 *Artificial lighting.* The Inspector imposed a condition on the Lock House conversions prohibiting any external lighting or floodlighting (condition 10). The applicant will accept the same condition here.

5.6 *Domestic detritus.* Refuse is stored in the communal bin store at the back gates approved under the Lock House consents. Bicycles are stored in the communal bike store approved under the Lock House consents. The applicant will accept a condition removing permitted development rights for outbuildings, hard surfaces, and fences, walls and gates. Nothing could then be added around the building without the Council's consent.

6. The "primacy of the country house"

6.1 The approved position of the estate includes:

- Lock House as five dwellings, DC/25/0037 and DC/26/0577.
- Two holiday lets in converted outbuildings DC/25/0359.
- A substantial agricultural barn DC/25/1539.

6.2 The Inspector found that the house's relationship with its wider parkland would be retained despite these changes (para 15). One screened, estate-style building of accepted design, some 230m away and on lower ground, cannot sensibly be said to challenge the primacy of the house in a way the consented schemes do not.

6.3 The Council's own delegated report on DC/25/1881 (15 September 2026) reached a similar view. It found that siting a building here "could be acceptable". It also found that "the site is not experienced in association with Lock House, with significant levels of intervening screening". The report on the 2014 stable block found the same: that building "would not be seen in association with the adjoining listed building".

6.4 The Heritage Statement's assessment, using Historic England's GPA3 method, confirms this on the facts:

- There is no intervisibility between the site and Lock House.
- The site plays no part in the key views of Lock House, which are from the south and west.
- The site lies around 5m lower than the house.

7. Level of harm

7.1 The applicant's position is that the proposal preserves the setting of Lock House and causes no harm to its significance.

7.2 If the Council disagrees, any harm must fall at the very lowest end of less than substantial. It would arise only from a perception of use, in a screened location, from a building whose design the Council accepts. It is plainly less than the harm the Inspector identified from subdividing the house itself. That harm was also "at the lower end" and was outweighed.

7.3 The applicant recognises that the statutory duty under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires any harm to be given considerable importance and weight. That harm must then be weighed against the public benefits.

8. Public benefits

8.1 The Conservation Officer's statement that there are "no public benefits" is wrong. It is also inconsistent with the Council's own findings.

8.2 The delegated report on DC/25/1881 found that the same accommodation would contribute to the District's visitor accommodation and "would provide further benefits toward the economy". The Council's Economic Development team supported that application. It found it "well aligned" with the Enterprising Horsham Visitor Economy Strategy, and identified larger group accommodation as particularly limited within the District.

8.3 *Meeting an identified gap.* The Council's Hotel and Visitor Accommodation Study (2016) found strong demand, and a shortage of supply, for large "super cottages" serving family and group stays. Holiday-let consents in the District since then have been almost entirely small units. This proposal meets the gap the Council itself identified.

8.4 *Economic activity.* Occupancy is projected to stabilise at around 70%, with rates from £3,600 per stay. That equates to 85 group stays a year, for up to 16 guests at a time, and gross revenue in the order of £300,000 a year.

The business will support local work in hosting, cleaning, laundry and maintenance. It will also bring regular work for local caterers, therapists, trainers and Sussex vineyards. Guests will spend in local pubs, shops and attractions, including the Green Man, the Fountain Inn, the Knepp estate, Steyning and Horsham.

The property will also be liable for business rates directly contributing revenue to the Council.

8.5 Support from local pubs. The benefit to local businesses is not theoretical. Two local country pubs supported the previous application, DC/25/1881, and support this proposal for the same reasons.

The owner of the Fountain Inn at Ashurst wrote on 19 January 2026. He said the area needs more tourist facilities to bring visitor spending into the local economy, particularly into food and drink at local pubs. He noted that the Fountain is a country walk from the site, and described the boost to the local economy as "so badly needed".

A representation from the Green Man at Jolesfield, dated 17 January 2026, described the proposal as a great addition to the village and surrounding area. It highlighted the extra tourism it would bring to local businesses "especially in this economic climate".

Rural pubs across the country are under well-documented pressure, and many depend on visitor trade to remain viable. A group of up to 16 guests staying three or four nights, around 85 times a year, is precisely the custom these businesses need.

These are the two representations of support recorded in the Council's delegated report on DC/25/1881. They come from the businesses that stand to benefit most directly. They should be given weight as evidence that the economic benefits identified in paragraph 8.4 are real and locally felt.

8.6 Accessibility. The building provides level access and two wheelchair-accessible bedrooms. The 2016 Study specifically identified a shortage of this type of accommodation.

8.7 Enjoyment of the countryside. The site gives direct access to the public rights of way network and the Downs Link, supporting quiet informal recreation in line with HDPF Policies 10, 11 and 26.

8.8 Ancient woodland restoration. The applicant is committed to a long-term, Forestry Commission-approved management plan for Grants Copse (see section 10). This is an environmental benefit that the development would secure.

8.9 Sustaining the estate. The Inspector found that the house can no longer be sustained as a single dwelling. Income from the holiday let supports the upkeep of the shared estate grounds and facilities that form the parkland setting of the listed building.

8.10 These benefits are real and substantial. Even if the Council were to find some very limited harm, they clearly outweigh it. The Inspector carried out the same balance for this asset and reached that conclusion on a proposal causing greater harm.

9. Principle of development

9.1 The delegated report on DC/25/1881 found no conflict with HDPF Policies 10, 11 and 26. It found no harm to residential amenity or highway safety, and it found the proposal water neutral. None of those findings has changed.

10. Ancient woodland and arboricultural matters

10.1 The Arboricultural Officer's comments of 26 August were responded to on 28 August with the Ancient Woodland Buffer Zone Management Statement and amended floor plans which are now all on the public file.

10.2 Your email of 2 September said the Arboricultural Officer considered the amendments needed were too extensive to deal with within a live application. With respect, no redesign is needed. The Arboricultural Officer's concern was the use of the land within the buffer, not the buffer distance, which the scheme already achieves. That concern is fully answered by the commitments below.

10.3 *Buffer width.* The buffer is at least 15m throughout, rising to 18m, in line with Natural England's standing advice.

10.4 *No garden.* The buffer has never been shown as garden. In the submitted biodiversity net gain metric it is allocated to new native hedgerow planting and wildflower meadow.

10.5 *No access.* The entrance has been moved to the east elevation, so the building has no access onto the buffer.

10.6 *Demarcation and restrictions.* A permanent post-and-rail fence will mark the buffer line. No paths, hard surfacing, lighting or domestic use will be allowed within the buffer. This can be secured by condition, or by unilateral undertaking if preferred.

10.7 *Condition of the woodland.* The current understorey reflects deliberate management. Around five years ago, invasive cherry laurel was removed and trees killed by ash dieback were cleared. Wild garlic, bluebell and other ancient woodland ground flora have since regenerated strongly.

10.8 *Woodland management plan.* With help from the Forestry Commission's officer for Sussex, the applicant has submitted a small-site woodland management plan for Grants Copse to the Forestry Commission for consultation. The receipt was sent to you on 3 September.

The ancient woodland is not part of the application site. It is, however, within the applicant's ownership. The applicant will therefore accept a condition that no development starts until the woodland management plan has been approved.

11. Ecology

11.1 The ecology advisor's holding objection sought bat survey information for trees T9 and T11. T9 and T11 will now be retained. Works to T11 are limited to removing some upper branches, leaving the lower stem and the wound feature untouched addressing no ecological grounds for refusal.

11.2 No response to these submissions has been received. I would ask that the ecology advisor be reconsulted before determination.

12. Conditions the applicant will accept

12.1 In addition to the standard time-limit and approved-plans conditions, the applicant will accept conditions covering the following:

- Occupation restricted to holiday-let use only, with a register of occupiers kept and available to the Council.
- No private garden or curtilage to be formed.
- Samples of materials, and large-scale details of joinery, brickwork, eaves, dormers and the clock tower, to be approved.
- A hard and soft landscaping scheme to be approved and maintained, including the yew hedge around the parking.
- Parking limited to the approved grasscrete area.
- No external lighting or floodlighting, mirroring the Inspector's condition 10
- Removal of permitted development rights for outbuildings, hard surfaces, and fences, walls and gates.
- Refuse storage in the approved communal bin store. Bike storage in the approved bike store.
- Woodland buffer to be demarcated and kept free of domestic use, paths, surfacing and lighting.
- No development to start until a woodland management plan for Grants Copse has been approved.
- Implementation of the biodiversity net gain habitats and a biodiversity enhancement strategy.
- A drainage strategy to be approved before commencement..

13. Conclusion

13.1 The design of the building is agreed. The Conservation Officer's remaining objection relates to effects of use that are not proposed, or can be fully controlled.

13.2 The Planning Inspectorate has found that residential use of an estate outbuilding at Lock House does not affect its setting. It has also found that more significant changes to the house itself are justified by their public benefits.

13.3 The ancient woodland concerns are resolved by a secured, semi-natural buffer and a Forestry Commission-approved management plan.

13.4 I would ask that planning permission be granted subject to conditions. If any concerns remain, I would welcome a meeting before the determination date of 6 October 2026, and I am willing to discuss appropriate amendments to the conditions.

Yours sincerely,

Nick Sutton
for Lock House Partners LLP