

[REDACTED]

From: [REDACTED]
Sent: 08 September 2026 16:11
To: Planning
Subject: DC/26/0933 Shanly homes Objection Further comments
Categories: Comments Received

FORMAL OBJECTION TO PLANNING APPLICATION DC/26/0933
Erection of 31 dwellings with access from Chapel Road, Barns Green, West Sussex
Applicant: Shanly Homes

From: [REDACTED]
3 Six Acres Close
Barns Green
RH13 0PL

Email: [REDACTED]

Member of the Public

Dear Planning Officer,

FORMAL OBJECTION TO PLANNING APPLICATION DC/26/0933

I am writing as a resident of Barns Green to formally object to Shanly Homes' proposal for the erection of 31 dwellings with associated access and infrastructure from Chapel Road.

I respectfully ask Horsham District Council to **refuse this application**.

The proposal raises substantial and unresolved concerns relating to the location of the site outside the Built-Up Area Boundary, countryside protection, the character and appearance of Barns Green, heritage assets, highway safety, emergency access, flooding and surface water, biodiversity, wastewater infrastructure, telecommunications and the cumulative impact of development in the village.

These concerns are reinforced by the **Itchingfield Parish Neighbourhood Plan 2024–2031**, which was formally made by Horsham District Council on 8 October 2025 and therefore forms part of the statutory Development Plan.

They are also particularly significant in light of the **recent refusal of the neighbouring Miller Homes application DC/25/2057**, which was refused by the Planning Committee on 4 August 2026. That application was refused partly because of its standardised suburban design, its failure to respond positively to the character of the historic village and the absence of proven foul sewer capacity.

I therefore ask that the following material planning considerations are given full weight.

1. The site is outside the Built-Up Area Boundary

The proposed site is currently outside the Barns Green Built-Up Area Boundary (BUAB) and is therefore countryside for the purposes of the adopted Horsham District Planning Framework.

This is an important material consideration.

HDPF Policy 3 – Strategic Policy: Development Hierarchy establishes that development is directed towards defined built-up areas and that land outside those boundaries is considered countryside where development is more strictly controlled.

HDPF Policy 4 – Strategic Policy: Settlement Expansion is particularly relevant. It states that settlement expansion outside a BUAB will be supported where, amongst other requirements:

- the site is allocated in the Local Plan or a Neighbourhood Plan and adjoins an existing settlement edge;
- the level of expansion is appropriate to the scale and function of the settlement; and
- the development meets identified local needs or assists the retention and enhancement of community facilities and services.

The proposed site is **not an allocation in the made Itchingfield Parish Neighbourhood Plan**.

Furthermore, the Neighbourhood Plan's own windfall policy, **Policy 11**, applies to unidentified residential sites **within the Built-Up Area Boundary**. It therefore provides no policy support for this proposal outside the BUAB.

The Council's own monitoring report confirms that the HDPF generally expects development to be focused within BUABs unless sites come forward as allocations through a Local Plan or Neighbourhood Plan.

The application should therefore be assessed as development in the countryside and against the stricter countryside and settlement-expansion policies.

2. HDPF Policy 26 – Countryside Protection

HDPF Policy 26 – Strategic Policy: Countryside Protection seeks to protect the countryside from inappropriate development and limits development in countryside locations to development that is essential to its countryside location or falls within the specified categories.

The proposed erection of 31 market and affordable dwellings is not development that requires a countryside location.

The application should therefore demonstrate a clear and compelling policy basis for overriding the adopted countryside protection policy.

This is particularly important because the site is not an allocated site in the made Neighbourhood Plan.

3. The made Itchingfield Parish Neighbourhood Plan must be given significant weight

The **Itchingfield Parish Neighbourhood Plan 2024–2031** formally covers Barns Green and was made by Horsham District Council on 8 October 2025.

The Plan states that Barns Green is a rural village with a distinctive historic and landscape character and that development must be proportionate to the ability of the parish to support it.

The Plan specifically states that new building must not destroy the rural character of the parish or adversely affect established daily life.

The Plan's policies are therefore directly relevant to this application.

In particular:

- **Policy 1 – Green Infrastructure Conservation**
- **Policy 2 – Biodiversity Conservation**
- **Policy 3 – Heritage Assets**
- **Policy 5 – Protection of Green Infrastructure**
- **Aim 2 – Managing Surface Water**
- **Aim 3 – Infrastructure Provision**
- **Policy 11 – Windfall Development**
- **Policy 12 – Design Parameters**
- **Policy 15 – Parking Provision**
- **Policy 16 – Water Neutrality**
- **Aim 7 – Bus Transport**
- **Aim 8 – Access for Emergency Vehicles**
- **Aim 10 – Increase of Traffic**

all provide relevant policy considerations against the proposal.

4. The proposal conflicts with the Neighbourhood Plan's design requirements

The made Neighbourhood Plan is particularly clear that development in the parish must sit comfortably within its rural character.

Policy 12 – Design Parameters requires development to:

- respect the character and scale of surrounding buildings and landscape;
- protect the identity and character of Barns Green and Itchingfield;
- avoid unacceptable harm to existing residents;
- create safe, accessible and well-connected environments;
- protect existing landscape features;
- use appropriate local materials; and

- positively respond to the local vernacular character.

The policy also requires development to be of high-quality design and layout and to create a sense of place.

The proposal should therefore not be assessed simply on whether the individual houses are attractive. The **scale, massing, layout, rooflines, materials, relationship to existing properties and relationship with the historic core of Barns Green** must all be assessed.

The recent Miller Homes refusal is highly relevant here. On 4 August 2026, Horsham Planning Committee refused the neighbouring 68-home proposal partly because its standardised suburban design failed to positively respond to the character and appearance of the locality within the historic core of Barns Green.

The same principle should be applied consistently to this application.

5. National planning policy on design

The proposal should also be assessed against **NPPF paragraphs 131–139** concerning well-designed places.

In particular, paragraph 135 requires development to be sympathetic to local character and history, including the surrounding built environment and landscape setting, and to establish or maintain a strong sense of place.

Paragraph 139 states that development which is not well designed should be refused, particularly where it fails to reflect local design policies and government guidance.

The proposed development must therefore demonstrate that it responds specifically to Barns Green rather than imposing a standard suburban housing-estate design.

6. Heritage assets and listed buildings

There are numerous listed buildings within Barns Green and the wider parish.

The proposed development would be particularly close to several Grade II listed buildings, including **Bennetts, Blacksmiths Cottage and The Queen's Head Public House**.

The made Neighbourhood Plan expressly recognises that development near heritage assets must preserve their setting and condition.

Policy 3 – Heritage Assets and Itchingfield Conservation Area requires development proposals to conserve heritage assets in a manner appropriate to their significance and gives special regard to preserving listed buildings and their settings.

The policy also requires appropriate assessment of the significance of heritage assets and the impact of development on them.

This is consistent with **NPPF paragraphs 207–215**, which require the significance and setting of heritage assets to be properly assessed and require great weight to be given to their conservation.

The Council should therefore require a robust heritage assessment addressing the effect of the proposed development on the listed buildings and their settings.

This should include the effect of building height, massing, rooflines, landscaping and the introduction of a substantial modern housing estate into the historic setting.

7. Impact on the character and appearance of Barns Green

HDPF Policy 32 – The Quality of New Development requires high-quality design which complements locally distinctive character and contributes to a sense of place.

HDPF Policy 33 – Development Principles requires development to respect surrounding buildings, landscape, open spaces and routes, including impacts on skylines and important views.

The made Neighbourhood Plan goes further by specifically requiring development to protect the identity and character of Barns Green.

The proposed 31-home estate would introduce a significant change to an established rural village environment.

The Council should consider whether the scale, density and appearance of the proposal are genuinely appropriate to Barns Green rather than merely acceptable in a suburban location.

8. Highway safety and access

The proposed access from Chapel Road is a significant concern.

Chapel Road is narrow and already experiences parking associated with the village shop and Queen's Head public house.

The development would introduce construction traffic, including HGVs, and subsequently additional traffic generated by 31 homes.

This raises concerns regarding:

- highway capacity;
- congestion;
- visibility;
- pedestrian safety;
- emergency access;
- construction traffic;
- interaction with parked vehicles; and
- the proximity of the access to the crossroads.

HDPF Policy 40 – Sustainable Transport requires development to be appropriate in scale to existing transport infrastructure and to provide safe and suitable access for vehicles, pedestrians, cyclists, horse riders, public transport and deliveries.

NPPF paragraph 115 similarly requires safe and suitable access for all users and requires significant transport impacts and highway-safety impacts to be appropriately addressed.

The Council should therefore require a robust Transport Assessment and should not rely solely on theoretical traffic modelling without considering the actual physical constraints of Chapel Road.

9. Emergency vehicle access

Emergency access is a particular concern.

The made Neighbourhood Plan contains **Aim 8 – Access for Emergency Vehicles**, which supports development providing sufficient, unimpeded access for emergency and public-service vehicles.

The Plan also records that street parking in parts of the village has already caused difficulties for public-service vehicles.

The introduction of construction traffic and additional permanent traffic close to an existing pinch point could further compromise emergency access.

The Council must therefore be satisfied that fire appliances, ambulances and police vehicles can access the area safely and without obstruction during both construction and occupation.

10. Construction traffic

The Neighbourhood Plan specifically addresses construction traffic.

It states that developers must route construction traffic along the **least disruptive routes** and, as far as practicable, avoid busy traffic periods.

This is particularly relevant given:

- the narrowness of Chapel Road;
- existing village parking;
- the nearby crossroads;
- school-related movements;
- pedestrian movements;
- the village shop and pub; and
- emergency-service access.

Any construction management plan should therefore be detailed and enforceable before permission is granted.

11. Increase in traffic

The made Neighbourhood Plan contains **Aim 10 – Increase of Traffic**, which states that the Parish Council will not support development proposals resulting in significant increases in traffic movements that have a disproportionately adverse effect on the parish or the locality surrounding the development.

The proposal must therefore be assessed not only in isolation but in combination with other development proposals in and around Barns Green.

This is particularly important given the neighbouring Miller Homes proposal and other planned development in the wider area.

12. Flooding and surface-water drainage

Flooding is a long-standing concern in Barns Green.

The proposed development field is understood to experience flooding, while existing drainage infrastructure in the village has struggled during periods of heavy rainfall.

The made Neighbourhood Plan specifically recognises that the parish lies on lowland clay and that the ground can struggle to absorb rainfall during periods of heavy rain.

Aim 2 – Managing Surface Water states that development proposals should seek to reduce existing run-off rates and supports sustainable drainage systems which reflect natural drainage patterns and manage water close to its source.

HDPF Policy 38 – Strategic Policy: Flooding requires development to avoid increasing flood risk and to incorporate appropriate mitigation.

The current NPPF also requires flood risk to be properly assessed and development to be directed away from areas at greatest risk where appropriate.

The Council should therefore require a comprehensive Flood Risk Assessment and surface-water drainage strategy, including consideration of:

- existing flooding;
- climate-change projections;
- soil permeability;
- groundwater;
- cumulative development;
- overland flow;
- drainage capacity;
- maintenance of SuDS; and
- the impact on existing properties and Chapel Road.

No development should proceed unless the Council is satisfied that it will not increase flood risk elsewhere.

13. Loss of hedgerows and green infrastructure

The mature hedgerow and the footpath known as Smugglers Lane provide important landscape and ecological functions.

The made Neighbourhood Plan's **Policy 1 – Green Infrastructure Conservation** seeks to conserve and enhance green infrastructure and states that proposals resulting in its loss will not be supported unless adequate mitigation or compensation is demonstrated and the existing ecosystem is protected.

Policy 5 – Protection of Green Infrastructure specifically identifies hedgerows, public rights of way, woodland, veteran trees and river corridors as valued landscape features requiring protection.

The loss or fragmentation of the existing hedgerow would therefore be contrary to the objectives and policies of the made Neighbourhood Plan unless the applicant can demonstrate that the impact can be satisfactorily avoided, mitigated or compensated.

14. Biodiversity and wildlife

The site and surrounding hedgerows are used by a range of wildlife.

Residents have observed dormice, bats, nesting and foraging birds and glow worms in the area.

The made Neighbourhood Plan contains **Policy 2 – Biodiversity Conservation**, which seeks to protect and enhance biodiversity and specifically recognises the importance of hedgerows, mature trees, commuting routes and ecological networks.

The Plan states that hedgerows and other features used by bats should be preserved or appropriately compensated for where surveys demonstrate their use.

This is consistent with **NPPF paragraphs 187–195**, including the requirement to protect and enhance biodiversity and ecological networks and to avoid significant biodiversity harm where this cannot be adequately mitigated.

A comprehensive ecological assessment should therefore be required, including appropriate surveys for bats, dormice, nesting birds and other protected or priority species.

15. Wastewater and foul-sewer capacity

This is one of the most important issues raised by the recent Miller Homes refusal.

The Miller Homes application immediately adjacent to this site, **DC/25/2057**, was refused by Horsham Planning Committee on 4 August 2026.

One of the stated reasons for refusal was the absence of proven foul sewer capacity from Southern Water.

This is directly relevant to the Shanly Homes proposal.

The made Neighbourhood Plan contains **Aim 3 – Infrastructure Provision**, which states that development proposals confirming that adequate infrastructure will be provided will be supported.

The Plan also specifically advises developers to engage with Southern Water regarding infrastructure capacity.

HDPF **Policy 39 – Strategic Policy: Infrastructure Provision** requires development to be accompanied by sufficient infrastructure provision and for applicants to engage with infrastructure providers.

The Council should therefore require clear and current evidence from Southern Water confirming:

1. the existing capacity of the Barns Green wastewater treatment works;
2. the existing capacity of the foul sewer network;
3. whether the network has sufficient capacity for these 31 homes;
4. whether cumulative development has been taken into account;
5. what upgrades are required;
6. when those upgrades will be delivered; and
7. whether occupation of the development would be conditional upon the necessary infrastructure being operational.

Given the recent Miller Homes refusal, it would be inconsistent to approve a neighbouring development without resolving the same infrastructure issue.

16. Cumulative infrastructure impact

The application should not be assessed in isolation.

Barns Green is already experiencing or anticipating significant development pressure.

The cumulative impact of:

- Shanly Homes' 31 dwellings;
- the Miller Homes proposal;
- development at Sumners Ponds;
- the Old School site at Itchingfield; and
- larger developments elsewhere in the wider infrastructure catchment

must be considered.

This is particularly important for wastewater, highways, drainage, electricity, school provision and other services.

The made Neighbourhood Plan's **Aim 3 – Infrastructure Provision** expressly requires development proposals to confirm that adequate infrastructure will be provided.

17. Mobile phone and telecommunications infrastructure

Barns Green currently has poor mobile phone coverage.

The made Neighbourhood Plan includes **Policy 8 – Broadband Provision**, which supports improved mobile-phone connectivity for the parish.

The issue is particularly important in relation to emergency services.

The Council should establish whether the existing telecommunications infrastructure is adequate for the additional population and whether the development would provide appropriate improvements where necessary.

18. Public transport and sustainability

Barns Green has limited public transport.

The made Neighbourhood Plan records that the existing bus service is infrequent and operates at inconvenient times.

Aim 7 – Bus Transport supports development proposals which provide convenient access to public bus transport.

The proposal would therefore need to demonstrate that its location is genuinely sustainable and that residents will have reasonable access to public transport and local facilities.

This is particularly relevant because the limited bus service means residents are heavily dependent on private cars.

19. Parking and congestion within the village

The Neighbourhood Plan specifically recognises that on-street parking in parts of Barns Green has caused difficulties for public-service vehicles.

Policy 15 – Parking Provision requires development to provide off-road parking for residents and visitors in accordance with West Sussex County Council requirements.

The Council should ensure that parking is sufficient to prevent additional pressure being placed on Chapel Road and neighbouring roads.

20. Water neutrality

The site lies within the Sussex North Water Resource Zone.

The made Neighbourhood Plan contains **Policy 16 – Water Neutrality**, requiring all development within the Sussex North WRZ to demonstrate water neutrality through water-efficient design and offsetting.

For residential development, the policy requires water use to be designed around a maximum of **85 litres per person per day**, together with offsetting sufficient to ensure no net increase in mains-supplied water use within the WRZ.

A full Water Neutrality Statement should therefore be required before permission is granted.

21. The neighbouring Miller Homes refusal is highly material

I believe the recent Miller Homes decision deserves particular consideration.

Application **DC/25/2057**, for 68 dwellings immediately adjacent to the Shanly Homes site, was considered by Horsham Planning Committee on 4 August 2026 and refused.

The Committee raised concerns including:

- the recently made Neighbourhood Plan;
- standardised suburban design;
- impact on the character of the historic village;
- foul sewer capacity;
- green-space loss;
- proximity to listed buildings;
- hedgerow retention;
- parking; and
- the site's relationship with the BUAB.

The formal reason for refusal specifically referred to the proposal's failure to respond positively to the character and appearance of the locality and the absence of proven foul-sewer capacity.

These are not merely historic or theoretical concerns. They are **very recent planning considerations relating to the adjoining site**.

The Council should explain why substantially similar considerations would produce a different conclusion for the Shanly Homes proposal.

22. The housing-site assessment and the community's preferred locations

During preparation of the Neighbourhood Plan, numerous potential sites were assessed.

The proposed Shanly site was not selected as one of the preferred housing sites.

The made Neighbourhood Plan instead identifies specific locations for housing, including the Sumners Ponds development and the former school site at Itchingfield.

The Plan therefore provides a locally prepared strategy for where housing should be accommodated.

The application should not be allowed to undermine that strategy by permitting an unallocated greenfield site simply because a developer has subsequently promoted it.

23. The emerging Horsham District Local Plan should not override the made Neighbourhood Plan

I understand that the emerging Horsham District Local Plan 2023–2040 identifies housing allocations around Barns Green.

However, the Council's own planning information confirms that the **Horsham District Planning Framework 2015 remains the adopted Local Plan**, while the 2023–2040 document is an emerging plan.

The emerging plan should therefore be given appropriate weight according to its current status, but it should not be treated as though it has already replaced the adopted development plan.

In particular, the Council should carefully consider the relationship between any proposed changes to the BUAB and the **made Itchingfield Parish Neighbourhood Plan**.

24. The proposal would cause unacceptable cumulative change to a rural village

Barns Green is a rural village with a distinctive historic character, surrounded by agricultural land, hedgerows and wildlife habitats.

The made Neighbourhood Plan describes the parish as retaining a largely tranquil rural character and identifies the importance of its historic field patterns, hedgerows, woodland and historic buildings.

Development must therefore be proportionate to the ability of the village to accommodate it.

The concern is not simply whether 31 homes can physically be fitted onto the site.

The question is whether **31 additional dwellings, together with their access, roads, lighting, parking, drainage and infrastructure requirements, can be accommodated without unacceptable harm to the character, appearance, ecology, heritage and functioning of Barns Green**.

I believe the evidence demonstrates that this has not been satisfactorily established.

CONCLUSION

For the reasons set out above, I respectfully request that Horsham District Council **REFUSE** planning application **DC/26/0933**.

The proposal should be refused because it would conflict with, or has not demonstrated compliance with, relevant provisions of:

Horsham District Planning Framework 2015

- **Policy 3 – Development Hierarchy**
- **Policy 4 – Settlement Expansion**
- **Policy 25 – District Character and the Natural Environment**
- **Policy 26 – Countryside Protection**
- **Policy 31 – Green Infrastructure and Biodiversity**
- **Policy 32 – The Quality of New Development**
- **Policy 33 – Development Principles**
- **Policy 34 – Cultural and Heritage Assets**
- **Policy 38 – Flooding**
- **Policy 39 – Infrastructure Provision**
- **Policy 40 – Sustainable Transport**
- **Policy 41 – Parking**

Itchingfield Parish Neighbourhood Plan 2024–2031

- **Policy 1 – Green Infrastructure Conservation**
- **Policy 2 – Biodiversity Conservation**
- **Policy 3 – Heritage Assets**
- **Policy 5 – Protection of Green Infrastructure**
- **Policy 8 – Broadband Provision**
- **Policy 11 – Windfall Development**
- **Policy 12 – Design Parameters**
- **Policy 15 – Parking Provision**
- **Policy 16 – Water Neutrality**
- **Aim 2 – Managing Surface Water**
- **Aim 3 – Infrastructure Provision**
- **Aim 7 – Bus Transport**
- **Aim 8 – Access for Emergency Vehicles**
- **Aim 10 – Increase of Traffic**

National Planning Policy Framework

In particular:

- **Paragraphs 109–118 – Sustainable Transport**
- **Paragraphs 131–139 – Well-Designed Places**
- **Paragraphs 161–186 – Climate Change and Flood Risk**
- **Paragraphs 187–195 – Natural Environment and Biodiversity**

- **Paragraphs 202–215 – Historic Environment and Heritage Assets**

I also ask the Council to give significant consideration to the **recent refusal of application DC/25/2057 for 68 dwellings on the adjoining Miller Homes site**. The Planning Committee's concerns regarding the recently made Neighbourhood Plan, village character, design and foul-sewer capacity are directly relevant to the determination of this application.

In particular, I ask that the Council does not approve this application unless it has first obtained **clear, current and independently verifiable evidence from Southern Water confirming that adequate foul-sewer and wastewater treatment capacity exists, taking account of cumulative development in the area**.

Barns Green has already accepted its share of development. Further development must be properly located, appropriately designed and supported by adequate infrastructure. Housing numbers alone should not override adopted planning policy, the made Neighbourhood Plan, highway and infrastructure constraints, heritage considerations, flood risk or the protection of the village's rural character.

I therefore respectfully request that **DC/26/0933 be refused**.

Thank you for considering my objection.

Yours sincerely,



Resident of Barns Green