4th October 2026

Dear Sir/Madam,

Final Comments

Appeal: 6014605

West Chiltington House, Harbolets Road, Pulborough, RH20 2LG

Application number: DC/26/0253

The Horsham District Planning Framework (HDPF) of 2015 is now in its 11th year. There is no updated planning framework. All maps of settlements, boundaries are out of date.

Horsham District Council (HDC) has no five-year land housing supply and no appropriate buffer. Therefore, without exception, the presumption in favour of sustainable development as per the NPPF must apply.

The council has refused the planning application but has not demonstrated how the harm of the development would **significantly and demonstrably** outweigh the benefits.

There are two main refusal points:

1. Location beyond a defined built-up area and not essential to this countryside location.

And

2. It would be of poor design and visual quality, where the proposal would appear as a prominent feature within the landscape.

For proper visual context and evidence, please see aerial and roadside photographs below of the surrounding area and the site itself. The site has been outlined in red.

Fig1. Expanded view of surrounding area.



Fig2. Expanded view of surrounding area.





Road-side Photographs:





The site is almost completely hidden by mature bushes, with only limited visual opportunities. These visual opportunities can only happen in passing traffic. There are no public pavements, footpaths, laybys or any other community stakeholders or local neighbours that are impacted by this development.

The photographic evidence demonstrates there are no nearby waterways, and the field adjacent to the site and the one across the road are for farm animal grazing. They are

clearly man maintained, and all hedging along the back of the property have been removed by the new owners of the field adjacent to the site. There is evidently no real biodiversity impact in this site that has two **lawful** permanent hard-standings adjacent to the site housing travellers.

The below picture shows the hardstanding for parking outlined in red. It was already constructed. It has been in existence before the acquisition of the property in September 2024.



In summary:

1. Development of this proposal is essential. Especially without a demonstrable housing supply from HDC. It is modest, of little impact to the countryside or the local neighbourhood, regardless of HDPF 11 year and out-of-date boundaries. The approximation of local facilities and services; Storrington, Pulborough, Thakeham, Billingshurst and Southwater are all within a 5-mile radius. Therefore, it cannot be said to be so isolated and the location so remote so as to be significantly and

demonstrably harmful, and that it is detrimental to the settlement pattern of an 11-year-old HDPF.

2. The locality's character and architectural appearance clearly shows the development to be in no way as described by HDC. The development would serve to enhance the current visual aspect of the area in all ways. To remove a derelict building and provide a home for five families is not a significant or demonstrable harm that would outweigh all benefits. The development conception is designed specifically for affordable housing. This must be considered at all times as the framework.

The proposed development has no detrimental impact that would significantly and demonstrably outweigh the benefits of providing housing for five families.

That a development is not strictly within a policy, does not automatically mean that the development is not sustainable or should be refused. The conflict to the policy must be identified and defined, so that it can be tested for a solution. HDC have failed to do this. There have been no identified conflicts arising that would significantly and demonstrably outweigh the benefits of the development.

All policies cited within the HDPF are out of date, made 11years ago and should only be given light weight. The NPPF is what should be considered here in all circumstances. An appendix has been provided of all the HDPF policies cited by HDC and it can be tested by the inspectorate to determine for themselves, if the development conflicts with these policies.

The only question is whether there are any material considerations that would cause such harm from any potential conflict that would outweigh the benefits of delivering homes for not one, but for five families.

The West Chiltington Neighbourhood Plan (WCNP) has been cited with the following policies:

- Policy H1
- Policy H2
- Policy H3
- Policy EH8

HDC have provided misleading information in their final response. See page 2. Where they refer to WCNP Policy H1.

states that development outside of built up areas will only be supported where the site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins a settlement edge.
Policy H1 of the West Chiltington Neighbourhood Plan states that development proposals will be supported where the following criteria as applicable are met:

a) Located within a built-up area boundary
b) Respond to the individual identities of The Common and The Old Villages as detailed in the Landscape Character Assessment
c) Do not have a detrimental impact on the predominantly open and undeveloped landscape setting of the Parish as a whole
d) All development within the Sussex North Water Resource Zone (WRZ) will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development
e) Land outside of either built up area boundary is considered to be countryside and development will only be allowed if it is the subject of a specific policy in this Neighbourhood Plan or can demonstrate a need to be located in the countryside, as set out in national and local policies.

Policy H2a and H2b allocations two sites for housing development. The application site does not form part of either of these allocations.

However, the WCNP has been attached, and the relevant extract is below:

Policy H1 Spatial Strategy and Built Up Area Boundaries

Development proposals within the Built-Up Area Boundaries will be supported where the following criteria as applicable, are met:

a) Respond to the individual identities of The Common and The Old Village as detailed in the Landscape Character Assessment at Appendix 8.

b) Avoid or minimise any adverse impact on the South Downs National Park or its setting and on the predominantly open and undeveloped landscape setting of the Parish as a whole as described in the Landscape Character Assessment.

Land outside the Built-Up Area Boundaries is identified as countryside.
Development proposals will only be supported in this part of the neighbourhood area where they are the subject of a specific policy in this Plan or can demonstrate a need to be in the countryside, as set out in national and local policies.

Policy H2. Simply because the development does not fall within land identified for new development, doesn't make it not unacceptable for planning.

The development does not contravene either policy H3 or EH8. As set out below.

Policy H3 Quality of Design

1. Proposals for new housing, extending or altering existing dwellings should be of a high quality, be energy efficient and designed to reflect the local character and reinforce, where appropriate, local distinctiveness. Proposals for major development should demonstrate through their Design and Access Statement how they have regard to the core principles set out in this Plan and the Village Design Guide 2021 (see Appendix 2) as well as how they will enhance/improve local character.

2. In addition to the specific requirements detailed in the Village Design Guide, the following items should be considered early in the design process and integrated into the overall scheme:

a) Bin stores and recycling facilities should be designed to screen bins from public view, whilst being easily accessible for residents. Bin stores should be placed in a position that meets the County Council's Highways standards.
b) Satellite dishes should be positioned carefully and as inconspicuously as possible.
c) Telephone and power lines should be placed underground.
d) Photo-Voltaic panels, and other devices using solar energy for domestic purposes should be designed and positioned to respond positively to the character of the immediate area.
e) Meter boxes should be bespoke, unobtrusive and complement the materials used for the remainder of the building.
f) Boundary treatments should be planted and close boarded fencing avoided.

Policy EH8 Landscape Character and Important Views

1. Development proposals should conserve or enhance the local landscape character of the neighbourhood area and should be informed by South Downs, Horsham District and West Chiltington Landscape Character Assessments.

2. Development proposals that would have a detrimental impact on significant views that currently provide open field aspects, views to the South Downs or views from the village centres and other open spaces will not be supported.

There is nothing stated in the HDC's comments with the above-mentioned policies of the WNCP that would show the development to have material considerations that **significantly or demonstrably** cause such harm to outweigh the benefits of the housing proposed.

The NPPF is cited with following policies:

- Policy S3
- Policy S5
- Policy S6
- Policy HO11
- Policy CC2
- Policy TR3
- Policy N2
- Policy N3
- Policy DP3

There is no reason why S3 and S5 cannot be relied upon in support of this development. S5 clearly states the development should be approved unless the benefits of doing so would be **substantially outweighed by any adverse effects.** The council have not identified any adverse effects that would warrant a refusal. The development meets several of the criteria laid out in S5.

HDC have failed to show where S6 can be relied upon such that the development conflicts with the WNCP. As shown above Policy H1 as laid out in the HDC's comment is incorrect. The development is not in conflict with WNCP Policy H1. Therefore, it is respectfully asked that this point is dismissed entirely from consideration.
Policy HO11 has been deemed not relevant, so no further comments will be made in this submission. It is also respectfully asked that HDC's misleading information is noted for record.

Policy CC2 deals with the mitigation of climate change and in accord with policies TR3 and TR4 where relevant to the proposal, prioritise sustainable patterns of movement.

TR3 states:

TR3: Locating development in sustainable locations

1. So that development is located where it can support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure, development proposals should reflect the following principles, taking into account the vision for the site, the type of development and its location:

TR4 states:

TR4: Street design, access and parking

1. To contribute to creating well-designed places, transport considerations should be integral to the design of development, proposals for which should:

a. Give priority first to walking, wheeling and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating easy access to high quality public transport, with layouts and densities which maximise the catchments for bus or other public transport services;

This is not relevant to the proposal as the infrastructure for sustainable patterns of movement have not been provided for by HDC. There is a distinct lack of public transport offering in the area and the road on which the development sits has none. There are no public footpaths or pavements, to enable walking. None of this is the responsibility of the development. Therefore, this consideration is not relevant to the development. The National policies recognise that these considerations must take into account the type of development, which HDC have failed to do.

It is unreasonable for HDC to have an expectation that this development prioritises sustainable patterns of movement, without providing the infrastructure for it. The locality of this area is as described. All residents rely on private transport and there is a distinct lack of public transport offering and therefore alternative means of transport other than cycling is not possible for any development in this area.

Therefore, it cannot be said that the development is contrary to the policies TR3 and TR4 and yet again, there has been no material consideration that significantly and demonstrably shows harm that outweighs the benefits.

HDC have ignored Policies L1 and L2 of the NPPF, which this development supports. It states:

L1: Planning for an effective use of land

1. To support the effective and efficient use of land the development plan should, at the most appropriate level:

a. Identify ways of accommodating as much as possible of the identified need for development in the area on previously developed land, including by:

Furthermore, L2 states:

L2: Making effective use of land

1. Substantial weight should be given to the benefits where a development proposal would achieve one or more of the following:

a. Remediating despoiled, degraded, derelict, contaminated or unstable land;

b. Making better use of vacant and underutilised land and buildings (such as: by bringing back into residential use empty homes and other suitable buildings; converting space above shops; redeveloping underutilised retail and business sites; and building on or above service yards, lock-ups, car parks and other transport infrastructure which are no longer required);

c. Making effective use of previously developed land and buildings through temporary uses, in situations where alternative development is anticipated within a reasonable period (including as a result of the land being allocated for an alternative purpose in the development plan); or

d. Creating additional homes or floorspace within settlements by using the airspace above existing residential and commercial premises, or through sensitive redevelopment or additional development within existing plots (including, but not limited to, the addition of mansard roofs, proposals to fill gaps in the existing roof line, the introduction of higher buildings at street corners and additional units within residential curtilages). Such proposals should:

i. Be consistent with the overall street scene, other than where: it is appropriate to have larger buildings (such as at street corners, or where building upwards would not cause substantial harm to the character of a building and its surroundings); the development would not be visible from the street frontage; or where specific changes are provided for through a design code which forms part of the development plan;

ii. Maintain safe access and egress for occupiers and users, and acceptable living standards for residents and neighbours in terms of access to daylight, sunlight, privacy and external amenity space; and

iii. Where the development would involve the use of residential curtilages, not occupy more than twice the footprint of all the existing buildings on the site, and, following development, would retain at least 50% of the non-developed area within the curtilage of the existing buildings[footnote 38]; unless additional development can be accommodated without harm to the overall character of the area, and taking into account the availability of infrastructure and the importance of locating development in sustainable locations (in accordance with policy TR3).

The development does exactly as described in L2 and therefore, this should form substantial weight in the planning decision making.

It is unclear why HDC have raised policies N2 and N3. The aerial pictures provided adequately show the state of the plot and surrounding areas. This is a development with exactly the same use as the previous development. There is minimal impact if any on the environment and the planning already states that the mature hedging at the border of the highway and existing trees are not to be affected. Therefore, the development is not in contradiction to the policies and will observe where relevant the principles laid out.

Given the development does not contradict DP3 as demonstrated in the aerial views provided, the application should not have been refused. The DP3 states:

DP3: Key principles for well-designed places

1. Development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings; such as through the arrangement of development plots and buildings, the use of materials and architectural features, and the restoration, reuse and integration of heritage assets. This should not preclude innovation or change where appropriate, especially where an increased scale or density of development is justified in accordance with policies L2 and L3.

2. To create well-designed places, development proposals should also reflect relevant aspects of the following principles, as appropriate to the nature of the development and its location[footnote 45]:

The development is justified and the policy should not preclude such innovation. Therefore, the development is not in conflict with any of the NPPF policies stated such that the harm would significantly and demonstrably outweigh the benefits of the development.

Therefore, the appeal is respectfully asked to be approved.

List of suggested conditions response

Please note, HDC are pinning the suggested conditions based on a framework that is 11 years old and not up to date.

1. Is unclear. Approved plans – no observation.
2. No observation.
3. No observation.
4. Disagreed. Building regulations will already deal with this matter adequately.
5. Disagreed. However, any trees or hedges that die or become damaged during the construction process shall be replaced as per location of the tree or hedge damaged. HDC will be notified of these instances for verification. This satisfies governance.
6. Disagreed. The development is not on a scale that warrants such a strategy for the redevelopment of a residential site.
7. Disagreed. The plans submitted adequately provide this information. Building regulations deal with this matter adequately.
8. Disagreed. This is moot. The hardstanding is already in existence.
9. No observation.

10. Disagreed. Cycling facilities will be provided for in the car park for the housing development not within each particular dwelling.
11. No observation.
12. This relies upon the infrastructure being available. If there is a provider than no observation.
13. Disagreed. The issue of water neutrality is no longer a concern and an optional requi[redacted]t become mandatory.

Signed: [redacted]

Printed: Miss L White

Date: 5th October 2026

4th October 2026

Appendix 1

Appeal: 6014605

West Chiltington House, Harbolets Road, Pulborough, RH20 2LG

Application number: DC/26/0253

This appendix provides extracts of the HDPF 2015 policies cited by HDC and should be read in conjunction with the final comments made by the applicant.

Text outlined in red require particular attention. The outlined text demonstrates the development not to in conflict with, but in fact satisfies the policies.

Cited Policies by HDC:

1,2,3,4,25,26,32,33

Policy 1

Strategic Policy: Sustainable Development

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with polices in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission, unless material considerations indicate otherwise – taking into account whether:

- **Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or**
- **Specific policies in that Framework indicate that development should be restricted.**

Policy 2

Strategic Policy: Strategic Development

To maintain the district's unique rural character whilst ensuring that the needs of the community are met through sustainable growth and suitable access to services and local employment, the spatial strategy to 2031 is to:

1. **Focus development in and around the key settlement of Horsham, and allow for growth in the rest of the district in accordance with the identified settlement hierarchy.**

2. **Recognise and develop Horsham town's role as the primary town for the District, promoting its historic function as a market town and safeguarding its compact and attractive character, and complemented by rationalisation and redevelopment at Broadbridge Heath Quadrant.**

3. **Bring forward three strategic development areas of at least 2,500 dwellings immediately to the north of Horsham Town, around 600 dwellings West of Southwater, and around 150 dwellings South of Billingshurst to meet the strategic requirement for new homes, and to provide access to new employment, health, educational and recreational opportunities.**

4. **Bring forward a strategic mixed used opportunity at the former Novartis site in Horsham for employments, education and specialist housing at the equivalent of around 200 units.**

5. **Continue to support in principle the sustainable development of settlements through an appropriate scale of development which retains the existing settlement pattern over the plan period.**

6. **Manage development around the edges of existing settlements in order to prevent the merging of settlements and to protect the rural character and landscape.**

7. **Guide development form and provide access to strategic green space and recreational opportunities in and around the built-up urban areas.**

8. **Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.**

9. **Identify existing sites of important employment use, and to safeguard their function through flexible policies and designation of Key Employment Areas, together with supporting the rural economy, to allow people the opportunity to work close to where they live.**

10. **Provide for the varied housing needs of the community in terms of tenure, affordability, care and other support needs and the specific temporary**

and permanent needs of the Gypsy and Travellers and Travelling Showpeople.

11. Support the provision of rural housing which contributes towards the provision of affordable housing where there is a demonstrable need.

12. Retain and enhance natural environmental resources, including landscapes and landscape character, biodiversity, and retaining and enhancing environmental quality including air, minimises energy and resource use and provides flood mitigation.

13. Support development which protects, conserves and enhances the District's built heritage whilst ensuring that new development is safe, well designed, adapts to climate change and helps to reduce the District's carbon emissions.

14. Monitor delivery of the Strategy and associated infrastructure in conjunction with partner organisations, developers and landowners.

Policy 3

Strategic Policy: Development Hierarchy

Development will be permitted within towns and villages which have defined built-up areas. Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale to maintain characteristics and function of the settlement in accordance with the settlement hierarchy below:

Settlement Type	Settlement Characteristics and Function	Settlements
Main Town	Settlement with a large range of employment, services and facilities and leisure opportunities, including those providing a district function. Strong social networks, with good rail and bus accessibility. The settlement meets the majority of its own needs and many of those in smaller settlements.	• Horsham
Small Towns and Larger Villages	These are settlements with a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and / or bus services. The settlements act as hubs for smaller villages to meet their daily needs, but also have some reliance on larger settlements / each other to meet some of their requirements.	• Billingshurst • Bramber and Upper Beeding • Broadbridge Heath • Henfield • Pulborough and Codmore Hill • Southwater • Steyning • Storrington

Settlement Type	Settlement Characteristics and Function	Settlements
Medium Villages	These settlements have a moderate level of services and facilities and community networks, together with some access to public transport. These settlements provide some day to day needs for residents, but rely on small market towns and larger settlements to meet a number of their requirements.	• Ashington • Barns Green • Cowfold • Partridge Green • Rudgwick and Bucks Green • Slinfold • Warnham • West Chiltington Village and Common
Smaller Villages	Villages with limited services, facilities, social networks but with good accessibility to larger settlements (e.g. road or rail) or settlements with some employment but limited services facilities or accessibility. Residents are reliant on larger settlements to access most of their requirements.	• Christ's Hospital • Lower Beeding • Mannings Heath • Rusper • Small Dole • Thakeham (The Street and High Bar Lane)
Unclassified settlements	Settlements with few or no facilities or social networks and limited accessibility, that are reliant on other villages and towns to meet the needs of residents	All other settlements

Policy 4

Strategic Policy: Settlement Expansion

The growth of settlements across the District will continue to be supported in order to meet identified local housing, employment and community needs. Outside built-up area boundaries, the expansion of settlements will be supported where;

1. **The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge.**

2. **The level of expansion is appropriate to the scale and function of the settlement type.**

3. **The development is demonstrated to meet the identified local housing needs and/or employment needs or will assist the retention and enhancement of community facilities and services.**

4. **The impact of the development individually or cumulatively does not prejudice comprehensive long term development, in order not to conflict with the development strategy; and**

5. **The development is contained within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced.**

Policy 25

Strategic Policy: The Natural Environment and Landscape Character

The Natural Environment and landscape character of the District, including the landscape, landform and development pattern, together with protected landscapes and habitats will be protected against inappropriate development. The Council will support development proposals which:

1. **Protects, conserves and enhances the landscape and townscape character, taking into account areas identified as being of landscape importance, the individual settlement characteristics, and maintains settlement separation.**

2. **Maintain and enhances the Green Infrastructure Network and addresses any identified deficiencies in the District.**

3. **Maintains and enhances the existing network of geological sites and biodiversity, including safeguarding existing designated sites and species, ~~and~~ ensures no net loss of wider biodiversity and provides net gains in biodiversity where possible.**

4. **Conserve and where possible enhance the setting of the South Downs National Park.**

Policy 26

Strategic Policy: Countryside Protection

Outside built-up area boundaries, the rural character and undeveloped nature of the countryside will be protected against inappropriate development. Any proposal must be essential to its countryside location, and in addition meet one of the following criteria:

1. **Support the needs of agriculture or forestry;**

2. **Enable the extraction of minerals or the disposal of waste;**

3. **Provide for quiet informal recreational use; or**

4. **Enable the sustainable development of rural areas.**

In addition, proposals must be of a scale appropriate to its countryside character and location. Development will be considered acceptable where it does not lead, either individually or cumulatively, to a significant increase in the overall level of activity in the countryside, and protects, and/or conserves, and/or enhances, the key features and characteristics of the landscape character area in which it is located, including;

1. **The development pattern of the area, its historical and ecological qualities, tranquillity and sensitivity to change;**

2. **The pattern of woodlands, fields, hedgerows, trees, waterbodies and other features; and**

3. **The landform of the area.**

Policy 32

Strategic Policy: The Quality of New Development

High quality and inclusive design for all development in the district will be required based on a clear understanding of the local, physical, social, economic, environmental and policy context for development. In particular, development will be expected to:

1. **Provide an attractive, functional, accessible, safe and adaptable environment;**
2. **Complement locally distinctive characters and heritage of the district;**
3. **Contribute a sense of place both in the buildings and spaces themselves and in the way they integrate with their surroundings and the historic landscape in which they sit;**
4. **Optimise the potential of the site to accommodate development and contribute to the support for suitable complementary facilities and uses; and**
5. **Help secure a framework of high quality open spaces which meets the identified needs of the community.**

Policy 33

Development Principles

In order to conserve and enhance the natural and built environment developments shall be required to:

1. **Make efficient use of land, and prioritise the use of previously developed land and buildings whilst respecting any constraints that exist;**
2. **Ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land, for example through overlooking or noise, whilst having regard to the sensitivities of surrounding development;**
3. **Ensure that the scale, massing and appearance of the development is of a high standard of design and layout and where relevant relates sympathetically with the built surroundings, landscape, open spaces and routes within and adjoining the site, including any impact on the skyline and important views;**
4. **Are locally distinctive in character, respect the character of the surrounding area (including its overall setting, townscape features, views and green corridors) and, where available and applicable, take account of the recommendations/policies of the relevant Design Statements and Character Assessments;**
5. **Use high standards of building materials, finishes and landscaping; and includes the provision of street furniture and public art where appropriate;**
6. **Presume in favour of the retention of existing important landscape and natural features, for example trees, hedges, banks and watercourses. Development must relate sympathetically to the local landscape and justify and mitigate against any losses that may occur through the development; and,**
7. **Ensure buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, unless this conflicts with the character of the surrounding townscape, landscape or topography where it is of good quality.**

Proposals will also need to take the following into account where relevant:

8. **Incorporate where appropriate convenient, safe and visually attractive areas for the parking of vehicles and cycles, and the storage of bins/recycling facilities without dominating the development or its surroundings;**
9. **Incorporate measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area; and create visually attractive frontages where adjoining streets and public spaces, including appropriate windows and doors to assist in the informal surveillance of public areas by occupants of the site;**
10. **Contribute to the removal of physical barriers; and,**
11. **Make a clear distinction between the public and private spaces within the site.**

It is respectfully asked that the officer determining this case, if possible, notes for record that HDC are in direct contravention to Policy 1.

Thank you, Miss White

[redacted]