

From: Planning@horsham.gov.uk
Sent: 26 August 2026 19:45
To: Planning
Subject: Comments for Planning Application DC/26/1186
Categories: Comments Received

Comments summary

Dear Sir/Madam,

Planning Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 26/08/2026 7:45 PM from [REDACTED].

Application Summary

Address:	Land North of Rectory Lane Ashington West Sussex
Proposal:	Outline Application for redevelopment of the site to provide up to 125 dwellings, access, public open space and associated landscaping, drainage and highways infrastructure with all matters reserved except access.
Case Officer:	Sam Whitehouse

[Click for further information](#)

Customer Details

Name:	[REDACTED]
Email:	[REDACTED]
Address:	6 Blakiston Close Ashington Pulborough West Sussex

Comments Details

Commenter Type:	Neighbour
Stance:	Customer objects to the Planning Application
Reasons for comment:	- Highway Access and Parking - Loss of General Amenity - Other - Overdevelopment - Privacy Light and Noise - Trees and Landscaping
Comments:	I object to application DC/26/1186 and request that planning permission be refused. DEVELOPMENT PLAN CONFLICT Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the application

to be determined in accordance with the development plan unless material considerations indicate otherwise.

The relevant development plan includes the Horsham District Planning Framework 2015 and the made Ashington Neighbourhood Development Plan 2019-2031. The application site is agricultural land outside Ashington's defined built-up-area boundary and is not allocated for housing in either plan.

The proposal conflicts with the spatial strategy of the Ashington Neighbourhood Plan, particularly Policy ASH1, and with the Horsham District Planning Framework policies controlling development outside defined settlements. The Neighbourhood Plan was examined, approved at referendum and made by HDC on 23 June 2021. Although the particular five-year protection afforded to neighbourhood plans under national policy has expired, and its housing figure is not a permanent ceiling, the plan remains part of the statutory development plan. Its spatial strategy continues to carry statutory weight.

District-wide housing need is an important material consideration, but it does not establish that this particular site is suitable. HDC must identify the extent of the development plan conflict and determine whether the benefits of these 125 homes outweigh the harm arising from that conflict.

LANDSCAPE CAPACITY AND SETTLEMENT EXPANSION

At paragraph 3.21, the applicant's Landscape and Visual Impact Assessment records that HDC's Landscape Capacity Assessment states:

"The land in the west of the area, north of Rectory Lane is attractive rural countryside which does not have the capacity to absorb housing development."

HDC's assessment is strategic and describes its capacity findings as indicative. The applicant accepts that the assessment contains this conclusion but, relying on its own site-specific assessment, argues that the land has greater capacity to accommodate development.

Nevertheless, the quoted conclusion concerns the western part of Landscape Study Area AS3, within which the application site lies. If HDC reaches a different conclusion from its own landscape evidence, it should identify the site-specific evidence and reasoning that justify doing so.

The proposal would extend Ashington's built form across its present northern edge and permanently replace agricultural countryside with housing, estate roads, lighting and associated infrastructure. Proposed planting may soften or screen parts of the development over time, but it cannot restore the countryside or prevent the permanent outward expansion of the settlement.

NATIONAL POLICY AND INFRASTRUCTURE CAPACITY

The applicant's July 2026 Planning Statement was prepared by reference to the December 2024 NPPF. HDC must determine the application under section 38(6) while treating the decision-making policies in the August 2026 NPPF as current material considerations.

Policy S5 requires more than evidence of unmet housing need. For housing outside an existing settlement, HDC must also be satisfied that the development is physically well-related to the settlement and is of a scale capable of being accommodated, taking account of the existing or proposed availability of infrastructure.

The application has not yet demonstrated compliance with that requirement.

1. Foul drainage

Southern Water confirms that the existing foul sewer network has inadequate capacity to receive the development and that off-site reinforcement will be required.

The published evidence identifies no specific reinforcement scheme, programme, confirmed completion date or assessment of cumulative demand from housing already committed in Ashington. A general indication that reinforcement for non-strategic development may usually be delivered within 24 months does not establish that sufficient capacity for this development will be operational when required.

Unless Southern Water confirms, against an up-to-date cumulative-development scenario, the reinforcement required and when it can be delivered, HDC lacks sufficient evidence to conclude that the proposal can be accommodated by the available infrastructure.

Permission should therefore be refused or determination deferred. If HDC considers that the deficiency can be addressed by condition, no dwelling should be occupied until the necessary reinforcement is operational and Southern Water has confirmed that adequate foul-drainage capacity is available.

2. Education

Using the Department for Education pupil-yield dashboard, the applicant's Health Impact Assessment estimates that 125 homes would generate demand for approximately 10 early-years places, 38 primary-school places and 19 secondary-school places.

For primary education, the Assessment records Ashington CofE Primary School as having capacity for 210 pupils and 183 pupils on roll, indicating 27 apparent available places. On those figures, this application alone would generate demand approximately 11 places greater than the school's recorded spare capacity.

That comparison does not address the correct cumulative position. Ashington already has an approximately 300-home committed development pipeline outside the Northern Cluster. Any pupil demand arising from approved but not yet fully occupied housing must be included before the remaining capacity of the school can be assessed. Present roll numbers cannot be treated as available capacity for DC/26/1186 if that capacity will be taken by children from development already permitted.

An aggregate total of 27 unfilled places also does not establish that places will be available in the particular year groups required when these homes are occupied. The applicant's own Assessment consequently recommends engagement with WSCC to establish whether the demand can be accommodated and whether mitigation is necessary.

The safeguarding of 0.54 hectares under DC/23/0406 for possible school expansion does not demonstrate that an expansion has been designed, approved, funded or programmed. An expectation that CIL will be paid likewise does not establish that additional capacity will be delivered when required.

For secondary education, the applicant identifies Steyning Grammar School as the nearest secondary school, approximately 5.2 miles from the site. Although the Assessment records substantial aggregate capacity at that school, the relevant future baseline must include pupils from committed housing.

This includes the approximately 300-home Ashington pipeline and the committed 256-dwelling Glebe Farm development in Steyning, approved at reserved matters stage under DC/25/1138 pursuant to outline permission DC/21/2233. Glebe Farm is directly relevant to any reliance upon apparent capacity at Steyning Grammar School. Current roll figures cannot be treated as future spare capacity without accounting for pupils from these permitted developments.

The Assessment also does not adequately address accessibility. A distance of 5.2 miles is beyond the three-mile statutory walking distance applicable to children aged eight and over. Subject to the statutory eligibility criteria, this will create additional demand for WSCC-funded home-to-school transport. It also means that secondary-school journeys cannot reasonably be assumed to take place on foot.

WSCC-funded transport does not ordinarily accommodate breakfast clubs, after-school activities or homework clubs, which further limits the practical accessibility of secondary education for households without access to a car.

Before determining the application, HDC should obtain a current WSCC assessment addressing primary-school capacity by year group; early-years capacity; demand from all committed but not yet fully occupied Ashington development; the additional demand from DC/26/1186; whether Ashington CofE Primary School requires expansion and, if so, how and when it will be delivered; secondary-school capacity after accounting for the Ashington pipeline, Glebe Farm and other relevant committed development; and the financial and operational consequences for home-to-school transport.

Unless that evidence demonstrates that sufficient education capacity and transport provision will be available when required, HDC cannot safely conclude that the development is of a scale capable of being accommodated by existing or proposed infrastructure.

3. Healthcare

The applicant estimates that the development could accommodate approximately 290 residents and generate demand equivalent to about 0.2 full-time-equivalent GPs.

Its Health Impact Assessment records that the two nearest practices, Glebe Surgery and Steyning Health Centre, are operating at approximately 1,920 and 1,940 patients per GP respectively. Both figures exceed the applicant's stated benchmark of one full-time-equivalent GP per 1,800 patients.

The applicant relies on a more favourable Primary Care Network ratio when trainee GPs are included. That calculation does not establish the permanent workforce or premises capacity of the practices most likely to serve the development, their ability to register additional patients, or their capacity after committed development has been occupied.

The assessment must not consider these 125 homes in isolation. It should include the approximately 300 homes already committed in Ashington but not necessarily occupied. It should also account for other substantial committed development within the catchment of the practices relied upon by the applicant.

This includes the committed 256-dwelling Glebe Farm development in Steyning, approved under DC/25/1138 pursuant to outline permission DC/21/2233. Steyning Health Centre is one of the two nearest practices identified in the applicant's own Assessment. Glebe Farm is therefore reasonably capable of adding material demand to the same healthcare provision upon which DC/26/1186 relies.

Current patient-to-GP ratios cannot be treated as representing future capacity if they exclude residents from substantial permitted development that has not yet been completed or fully occupied. The relevant question is whether sufficient permanent workforce and premises capacity will exist after the cumulative committed-development population has been included.

The applicant's own Assessment recommends consultation with the responsible NHS body during determination. HDC should obtain a substantive response before deciding the application. It should address the Ashington committed-development pipeline, Glebe Farm, any other relevant committed growth, workforce and premises capacity, the ability of the nearest practices to accept additional patients, and the nature and timing of any necessary mitigation.

A generic financial contribution does not, by itself, demonstrate that additional doctors, clinical staff or consulting space can be recruited and made operational. Unless the cumulative position is established, HDC cannot safely conclude that adequate healthcare infrastructure will be available to serve the development.

4. Transport and services

The applicant relies heavily on the existing Route 23 bus service and states that the Rectory Lane bus stops on London Road are approximately 600 metres, or an eight-minute walk, "from the Site". This is not a complete assessment of accessibility.

The application does not identify the precise point from which the 600-metre distance was measured, whether it represents the actual usable walking route, or the distance from the individual dwellings that would generate the journeys. As layout is reserved, the eventual door-to-stop distances, including travel through the development itself, cannot presently be established. The published figure should not therefore be treated as demonstrating that the bus stops will be conveniently accessible to all future residents.

HDC and WSCC should require a measured and audited walking route from the proposed residential parcels to both bus stops. That assessment should address actual route length, footway continuity and width, crossing points, lighting, gradients, surface condition and accessibility for children, older people and disabled users.

This application proposes lighting at the stops, together with pedestrian works and a Residential Travel Plan. Other identified bus-stop improvements are already committed through DC/25/1327. These measures may improve waiting conditions and access to the existing service, but they do not increase its frequency, passenger capacity, reliability or operating hours. A Travel Plan is principally a behavioural measure and cannot itself provide additional transport capacity.

Before treating Route 23 as a significant benefit or relying upon it to reduce car use, HDC and WSCC should establish that the complete walking route is safe and genuinely accessible and that the service can accommodate cumulative demand from this proposal and committed development. Improvements secured through DC/25/1327 should not be counted again as mitigation for DC/26/1186.

CIL, section 106 obligations and planning conditions may provide appropriate mitigation where the necessary measures are identified, deliverable and fairly related to the development. They are not substitutes for evidence that essential infrastructure can be provided when required. If HDC relies upon a future infrastructure project, the project, delivery body, funding mechanism and enforceable delivery trigger should be identified before permission is granted.

Taken together, the presently published evidence does not demonstrate that the cumulative demands of DC/26/1186 and committed growth can be accommodated by foul drainage, education, healthcare and transport infrastructure. HDC should not assume that unidentified future works or generic financial contributions will remedy those deficiencies. Unless the necessary capacity and deliverable mitigation are established before determination, this weighs against permission.

STATUS OF MM229

The applicant relies upon proposed allocation HA5-ASN2, introduced through MM229. Its documents describe the application site as the south-western part of the promoted 450-home Ashington Northern Cluster and rely upon a wider masterplan.

MM229 is not adopted. It remains subject to the local plan examination and consultation process. The applicant's own Planning Statement acknowledges that the emerging allocation carries limited weight.

The publication of MM229 cannot therefore be treated as a final determination that either this application or the wider allocation is acceptable. DC/26/1186 must be determined on its own planning merits and on the evidence supporting these 125 homes.

Where the applicant relies upon benefits said to arise from a comprehensive cluster masterplan, the associated infrastructure, connections, phasing and cumulative effects must be demonstrated rather than assumed.

For clarity, the proposed 450-home allocation includes the 125 homes in this application. I do not add the two figures together.

CUMULATIVE TRANSPORT ASSESSMENT

Applying the Transport Assessment's stated trip rates to 125 dwellings produces approximately 62 two-way vehicle trips during the morning peak, 56 during the evening peak and 523 over a day.

The Transport Assessment includes an established 300-home non-cluster development pipeline. It does not appear to assess the now-live adjoining application DC/26/1037 or the wider development scenario upon which the applicant relies elsewhere in its case.

I do not suggest that every submitted application must automatically be treated as committed development. HDC and WSCC must, however, determine which developments are committed or sufficiently certain to form part of a reasonable future scenario at the date of determination. The resulting trip distribution, junction effects, pedestrian effects and cumulative network consequences should then be assessed professionally.

Permission should not be granted on the basis of assumptions that have been overtaken by material applications or development commitments arising while DC/26/1186 is under consideration.

ACCESS MUST BE RESOLVED AT OUTLINE STAGE

Access is the only matter submitted for detailed approval. It cannot be deferred to reserved matters.

The formal application-document schedules and the separately published Proposed Site Access Plan identify drawing 25-036-006 Revision A. In contrast, paragraph 5.3.2 of the Transport Assessment states that the proposed access arrangements are shown on drawing 25-036-006 Revision C in Appendix F. Revision C appears to be the later design intended to supersede Revision A, but the published submission does not clearly regularise that substitution.

As access is the only matter submitted for detailed approval, HDC must confirm which revision forms part of the application and ensure that WSCC and affected residents have considered the precise drawing proposed for approval. If Revision C materially changes the access arrangements previously published or assessed, appropriate reconsultation should take place before determination.

The assessment must establish the safety and deliverability of the fixed accesses, including visibility, pedestrian conditions, the extent and significance of hedgerow removal, effects on trees and ecological connectivity, and the relationship between the accesses and existing dwellings opposite.

My home directly faces the application site. Relevant effects include the position and operation of the accesses, vehicle headlights, traffic noise and pedestrian safety. These are legitimate land-use and residential-amenity considerations. This objection does not rely upon any private right to retain a view.

ENVIRONMENTAL ASSESSMENT

The applicant accepts that the proposal falls within Schedule 2 as urban development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and has requested a screening opinion.

The applicant's Screening Report is evidence submitted in support of that request. It is not HDC's statutory screening opinion. I have not identified HDC's own screening opinion among the documents currently published.

Permission should not be granted unless HDC has first adopted a reasoned screening

opinion addressing the relevant Schedule 3 selection criteria.

The applicant maintains that these 125 homes can proceed independently while also relying upon a comprehensive 450-home allocation and site-wide masterplan. Separate landownership does not automatically establish that the proposals constitute a single EIA project. HDC must nevertheless reach a clear and reasoned conclusion on the proper scope of the project and ensure that its environmental effects have not been assessed too narrowly.

DRAINAGE AND HERITAGE

The site's location in Flood Zone 1 does not resolve surface-water exceedance routes, downstream effects, long-term maintenance or foul-sewer capacity. The Environment Agency response is expressly recorded as a "misconsultation", not as approval of the drainage proposals. HDC must obtain and consider the conclusions of the Lead Local Flood Authority and Southern Water before determining the application.

The applicant identifies a very low degree of less-than-substantial harm to the setting of Grade II listed West Wolves Farmhouse. HDC must discharge its duty under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and give considerable importance and weight to the desirability of preserving the listed building and its setting before undertaking the planning balance.

CONCLUSION

The development would provide housing, including affordable housing if secured, together with public open space and biodiversity net gain. These are material benefits.

On the evidence currently published, those benefits do not outweigh the conflict with the adopted spatial strategy; permanent development of countryside which HDC's landscape evidence states lacks capacity to absorb housing; the primary-school capacity shortfall identified by the applicant's own evidence; inadequate existing foul-sewer capacity without an identified and programmed reinforcement scheme; incomplete cumulative transport evidence; the limited public-transport mitigation offered by this application; and unresolved matters concerning the definitive access plan, environmental assessment, drainage, healthcare and heritage.

Planning permission should be refused.

HDC should not determine the application favourably until it has adopted a reasoned EIA screening opinion; confirmed and completed any publicity required for a departure from the development plan; identified the definitive access drawing; obtained current cumulative transport and infrastructure evidence; obtained substantive responses from WSCC education, the responsible NHS body, the Lead Local Flood Authority and Southern Water; discharged its statutory listed-building duty; and secured any mitigation upon which it relies as necessary to make the development acceptable.

If amended plans or material new technical evidence are submitted, affected residents and consultees should be given a fair opportunity to comment before the application is determined.

Where did you hear about this application?	Posted Letter from Local Authority
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Kind regards

Telephone:

Email: planning@horsham.gov.uk



**Horsham
District
Council**



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