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Our ref: PE/26/0160
Your ref:
Officer: Robert Hermitage
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Tel: 01403 215382
Date: 15th June 2026

Dear Sir/Madam,

Location: St Crispins Church Church Place Pulborough West Sussex

Details: To replace 1no approved dwelling under planning ref: DC/23/1361 with a pair of semi detached dwellings.

Your enquiry has been considered and I can advise as follows:

The pre-application enquiry relates to the site at St Crispins Church, Church Place, Pulborough, which has a planning history most recently extending back to 2021, comprising the following applications:

Application:	Description:	Status:
DC/21/1815	Demolition of existing church buildings and erection of No.7 dwellings with associated access, parking, and landscaping.	Application REFUSED on 25.05.2022 [APPEAL DISMISSED 13.07.2023]
DC/22/1428	Demolition of existing church buildings and erection of No.6 dwellings with associated access, parking, and landscaping.	Application REFUSED on 19.12.2022 [APPEAL DISMISSED 15.03.2024]
DC/23/1361	Demolition of existing building and erection of 6no. dwellings with associated access, parking, and landscaping	Application PERMITTED on 22.05.2025

Pre-application advice is sought to incorporate an additional dwelling on the site (net 7x dwellings compared to the approved 6x under the 2023 permission) by subdividing plot 6 towards the north-western end of the site. The resultant layout as depicted in the presented plans illustrate a similar layout to that initially submitted in the 2021 permission.

Principle of the Development and Background

DC/21/1815 was refused by the Council following a resolution at the planning committee for the following reasons:

- 1 *Notwithstanding information submitted, the application has not satisfactorily demonstrated with a sufficient degree of certainty that the proposed development would not contribute to an existing adverse effect upon the integrity of the internationally designated Arun Valley Special Area of Conservation, Special Protection Area and Ramsar sites by way of increased water abstraction, contrary to Policy 31 of the Horsham District Planning Framework (2015), Paragraphs 179 and 180 of the National Planning Policy Framework (2021), thus the Local Planning Authority is unable to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).*
- 2 *The appearance and layout of the development, with particularly reference to plots 6 & 7, is considered overdevelopment and would detrimentally affect the character and appearance of the surrounding area contrary to policies 32, 33 & 34 of the Horsham District Planning Framework (2015).*

The application was later revised alongside the submission of application DC/22/1428, which was refused under delegated powers for the following reason:

- 1 *Notwithstanding information submitted, the application has not satisfactorily demonstrated with a sufficient degree of certainty that the proposed development would not contribute to an existing adverse effect upon the integrity of the internationally designated Arun Valley Special Area of Conservation, Special Protection Area and Ramsar sites by way of increased water abstraction, contrary to Policy 31 of the Horsham District Planning Framework (2015), Paragraphs 179 and 180 of the National Planning Policy Framework (2021), thus the Local Planning Authority is unable to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).*

Both applications were subsequently appealed by the applicant and dismissed at appeal. In the case of both applications, the water neutrality reasons for refusal were upheld by the Inspector. However, the second reason attached to the 2021 permission was not, with the Inspector concluding *'the proposal would not harm the character and appearance of the area'* (Paragraph 37 of Appeal Ref: APP/Z3825/W/22/3303406).

It may, however, be important to note that the reason to refuse the 2021 application on the grounds of character and appearance was not carried over to any subsequent planning application determined on the site.

By way of timeline, the events of the applications submitted, determined and appealed are as such:

Timeline:

August 2021	DC/21/1815 submitted
May 2022	DC/21/1815 refused (committee)
July 2022	DC/22/1428 submitted, DC/21/1815 appealed
December 2022	DC/22/1428 refused (delegated)
July 2023	DC/23/1361 submitted, DC/21/1815 dismissed, DC/22/1428 appealed
March 2024	DC/22/1428 dismissed
May 2025	DC/23/1361 approved (committee)



Figure 1: 2021 and 2022/3 Proposed Site Layouts

Considering the above, especially when bearing in mind the Inspector's conclusions on the matter of character when assessing the proposal for 7x dwellings on the site, the Local Planning Authority would not object *in principle* to another dwelling coming forward as presented. However, it is important to bear in mind that altering the approved layout would bear other material planning considerations that the Council would have to consider, such as highways impact and amenity (discussed in detail below).

Character and Appearance:

Above, there is no in-principle reason as to why an additional dwelling on this site would not be supported by Officers, especially when considering the overall impact on character and the wider area. However, having reviewed the submitted details against the previously assessed scheme, I am of the view that the elevational treatment of the two units is lacking somewhat in terms of its visual appearance. Plots 6 and 7 in the 2021 proposal included a varied roofline and form that provided a reasonable level of visual difference on the site. The same could also be said about plot 6 on the approved scheme. By contrast, the submitted proposal seeks to replicate the appearance of plots 1-5, comprising an appearance almost identical to plots 1-2.

The rationale behind the previous proposals was to create an element of uniformity to the front of the site more akin to development expected to be seen on a street such as Church Place, and the rear taking on a form as a transition to more contemporary development similar to the cul-de-sac to the rear. As a result, I am concerned that this design concept would be too uniform, and lacks a desired level of variation. Whilst I appreciate that there may well be an appetite for complete uniformity on the site, a degree of variation would not go amiss in this location, especially given the varied character present in the area. Something as simple as staggering the building lines or rooflines, or incorporating a gable end to one of the units would achieve a more cohesive design. Therefore, I would suggest that this is revised prior to the submission of a formal planning application.

As part of the pre-application, I have also consulted the Council's Conservation Officer, who has raised that there would be no heritage implications for the proposed revision to the approved scheme.

Amenity:

As previously assessed in all applications on the site, no concerns were raised with regards to amenity impact on neighbouring properties. However, I note that bedroom 2 for both plots includes a secondary window to the side elevations where previously there were none. In order to ensure that the proposal continues to not adversely impact on neighbouring amenity, I would advise that these windows are either removed or include obscure glazing with non-opening parts below 1.7m from ground level (annotated on plan and then secured by way of condition). This should alleviate any potential concerns from neighbours regarding overlooking.

Highways Impacts

As above, altering the layout of the site would consequently impact on other material planning considerations, including parking. The Local Highway Authority (LHA) operate their own pre-application advice service further details of which can be found through the following link:

<https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/pre-applicationadvice-for-roads-and-transport/>

This may be useful to understand the impact the proposal may have on an intensified use of the existing access, as well sustainable transport assessments, and any additional parking requirements, as HDC is not able to fully assess the impact that the development may have on highway and its use.

It should also be noted that the LHA may require that a Section 278 (Work on Public Highways, Highways Act 1980) highways agreement to be sought if additional works are needed to service or improve the existing access. It is advised that the Applicant contact the LHA to engage in discussions to begin this process prior to the submission of a formal planning application.

Biodiversity Net Gain

Biodiversity Net Gain (BNG) is an approach introduced under the Environment Act 2021 to ensure that developments and land management leave the natural environment in a better state than it was before. It contributes towards nature recovery by helping to deliver habitat creation and enhancements as part of the design of new development.

There is now a statutory requirement to provide a minimum of 10% BNG on development sites. Further information can be found at:

<https://www.horsham.gov.uk/planning/planning-applications/biodiversity-net-gain>

Water Neutrality

A 2021 Position Statement from Natural England identified that it could not be concluded with the required degree of certainty that new development in the Sussex North Water Supply Zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites. As a consequence, and to comply with the legal duties set out in the Conservation of Habitats and

Species Regulations 2017 (known as the Habitat Regulations), all new development since has been required to demonstrate water neutrality.

On 31st October 2025 Natural England formally withdrew the 2021 Position Statement, citing a package of measures that they were satisfied would safeguard the Arun Valley sites. Principal amongst these measures is a reduction in the Southern Water abstraction licence. However, given the licence change has not yet taken place Horsham District Council, as competent authority under the Habitats Regulations, cannot yet be certain that new development will not result in adverse impacts on the Arun Valley sites.

To ensure development can come forward as water neutral in the meantime, the Council has agreed with Natural England to use the significant water savings made by Southern Water in 2024/25 through their programme of leakage reduction (amongst other measures). This has generated some 3,240,000 litres per day of water savings that can now be attributed to new development without increasing water abstraction in the Arun Valley beyond baseline. These savings were previously to be used to launch the Sussex North Water Certification Scheme (SNWCS), however following the withdrawal statement SNWCS will no longer be launching. Natural England standing advice dated 10 November 2025 raises no objection to using these savings to enable development to come forward. The standing advice clarifies that it functions as Natural England's formal response pursuant to Regulation 63(3) of the Conservation of Habitats and Species Regulations 2017 to all relevant planning applications which seek to achieve water neutrality using the above Southern Water savings.

Accordingly, Officers consider that the proposed development would not have an Adverse Effect on the Integrity of the Arun Valley Site, either alone or in combination with other plan and projects, thereby complying with Regulations 63 and 70 of the Conservation of Habitats and Species Regulations 2017, HDPF Policy 31, and paragraph 193 of the NPPF.

Conclusion:

Following a complex history of applications and subsequent appeals, including the refusal of a 7-dwelling scheme (DC/21/1815) and a 6-dwelling layout (DC/22/1428), a 6-dwelling proposal (DC/23/1361) was ultimately approved by the planning committee in May 2025. As the Planning Inspector previously dismissed the Council's character and overdevelopment objections regarding the 7-dwelling layout, Officers hold no objection in principle to an amended proposal coming forward that reintroduces an additional unit.

From a design and impact perspective, several detailed planning matters must be addressed before a formal submission. While the additional dwelling is acceptable in principle, Officers consider the current elevational treatments for the two rear units visually lacking when compared to the varied rooflines of previous iterations. The revised design should better reflect the established architectural narrative of uniform street-fronting units transitioning to a more contemporary, cul-de-sac style at the rear, though the Council's Conservation Officer has confirmed there are no negative heritage implications.

Regarding residential amenity, the newly introduced secondary side windows in bedroom 2 for both plots must either be omitted or fitted with obscure, fixed glazing below 1.7m to mitigate overlooking concerns to neighbouring properties.

Additionally, altering the approved site layout impacts highways considerations, meaning the applicant should engage with the Local Highway Authority (LHA) pre-application service to evaluate access intensification and explore potential Section 278 agreement requirements for public highway works.

Should an application be submitted further details on how to apply can be found through the following link:-

<https://www.horsham.gov.uk/planning/planning-applications/apply-for-planning-permission>

The above comments are given as the opinion of the Case Officer and do not prejudice any outcome of a subsequent application. Should you submit a formal planning application, please quote reference number PE/26/0160 in your submission.

Yours faithfully

Robert Hermitage
Principal Planning Officer

COMMUNITY INFRASTRUCTURE LEVY (CIL)

Horsham District Council implemented a Community Infrastructure Levy (CIL) Charging Schedule on 1st October 2017.

The Community Infrastructure Levy is a charge placed on new development. The funds raised will help to pay for a wide range of infrastructure to support development across Horsham District.

Most new development which creates net additional floorspace of 100m² or more, or creates a new dwelling, (including permitted development), is potentially liable for the levy.

How does it affect you?

Applications for CIL liable development which are determined on or after 1st October 2017 are required to pay the Community Infrastructure Levy (unless the development qualifies for relief or exemption).

Further information and the rates charged by Horsham District Council are set out in the CIL Charging Schedule which can be viewed online at www.horsham.gov.uk/planning/apply/cil

General Consent e.g. Permitted Development

Developments which are permitted by way of a general consent (such as permitted development) may still be liable to pay the Community Infrastructure Levy if they meet the above criteria.

In these circumstances, you must submit a Notice of Chargeable Development (CIL form 5), notify us of the person who will assume liability to pay the CIL and make any applications for relief or exemption, before the development is commenced.