Rec'd 25/11/24

DOUGLAS J P EDWARDS employing
Chartered Building Surveyors **Chartered Architects and Surveyors**

Principal: Douglas J P Edwards FRICS C.Build E FCABE FIAS

Blonks Barn
Hooklands Lane
Shipley
West Sussex RH13 8PY

Telephone No: [redacted]
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Our ref: 23-04
Your ref: APP/Z3825/W/24/3352243.

Date: 23rd November 2024

The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Ms Kausar

SITE ADDRESS: LOT 1, DELSPRIDE, KENT STREET, COWFOLD, HORSHAM RH13 8BB
APPEAL REFERENCE:- APP/Z3825/W/24/3352243

Thank you for forwarding the LPA's further comments regarding our Statement of Case.
We have now set out below our final comments stating why we believe the reasons for refusal are unreasonable and unjustifiable.

Refusal Reason 1.

Planning Appeal APP/Z3825/W/23/3333162 has been approved thereby allowing the formation of a single dwelling in the chicken shed on Lot 1 and Planning application DC/24/0560 has been approved for the creation of five dwelling houses on Lots 1 & 2. For clarity, this application showed the chicken shed on Lot 1 converted into two dwellings.

We are awaiting the Council's decision on application DC/22/0729 which also shows the chicken shed on Lot 1 being converted into two dwellings, albeit using a different design.

Planning application DC/23/1020 has been approved for two stables on Lot 1.

The overall effect of this Planning history is that the Council have a genuine desire to see residential accommodation at this location. However, the exceedingly long time that the Council have taken, and are still taking, has forced our Clients into taking the action that they have. We repeat that this was not their intention but they have their horses on site and their personal goods which need security and protection.

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Our desire is to get application DC/22/0729 resolved and move forward with a Full Planning application and build for Lot 1.

With that in mind we are respectfully requesting the temporary siting of the mobile home for a period of 3 years on the site.

We understand the Council's point of view, but the Planning history is there for all to see. The Case Officer refers to a 'Master Plan' desirability and this what we promoted under our PE/20/0168 approach some 4 years ago! Strangely, no mention of this PE is made in either the Delegated Report or under Relevant Planning History or the 'further comments' compiled yesterday.

We believe the request for permission to be wholly reasonable, taking the past into consideration, and do not agree with the strict 'Planning Policy only' attitude being advanced by the Council. It was correct at the time to make the overall site proposal under Part Q guidelines.

Refusal Reason 2.

The approval of Planning Appeal APP/3825/W/23/3333162 has confirmed that the siting of the dwellinghouse was perfectly acceptable.

Paragraph 14 of the Appeal Inspector's report is relevant and the key phrase is that the alleged unsuitable location would be 'so negligible in reality'.

Consequently, the mobile home positioning is acceptable and this reason for refusal is unjustifiable.

Refusal Reason 3.

We are at a loss to understand why so much emphasis is being put on the subject of Water Neutrality.

We submitted a Water Neutrality Statement by a Specialist Consultant for application DC/22/0729 and stated that it was to be used for 'any other Applications relative to Lot 1 etc.' During discussions with the Case Officer regarding Lot 1 there was a difference of opinion about existing water consumption levels which led to a situation whereby the Case Officer produced her own calculations and established that the resultant figures **allowed the water neutrality requirements to be screened out!** This included for two dwellings plus the horses at the site. So, we are confused as to why this is still an issue as we believe the refusal reason is again unjustifiable.

Thank you for allowing us the opportunity to make these comments.

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We will now await your notification of when the appointed Inspector will make the site visit.

Yours sincerely

[redacted]

Douglas J P Edwards FRICS C Build E FCABE FIAS
Chartered Building Engineer and Surveyor