

Planning and Development
Horesham District Council
Parkside, Horsham
West Sussex
RH12 1RL

Our Ref: 846_IG

BY E-MAIL

10th August 2026

Dear Sir / Madam,

Two Horsham Gates, 126 North St, Horsham RH13 5TU

RE: Full planning application for the Change the existing timber cladding material on external walls and existing cladding and decking on the balconies to non-materials five-storey residential complex to enhance fire safety.

This letter has been prepared by CREATE Planning ("Agent") on behalf of *Homeground Limited* ("Applicant") regarding the submission of a Planning Application for a proposal that seeks to remediate combustible cladding materials on the elevations and the combustible materials found on the balconies of the building ("Application") at Two Horsham Gates, 126 North Street, Horsham, West Sussex, RH13 5TU ("Site").

CREATE Design+Architecture ("Architect"), were prepared the drawings required for the submission to ensure a collective multi-disciplined approach was taken to streamline the process. Therefore, should you have any queries do not hesitate to contact either the Agent or the Architect.

The proposed description of development is as follows:

"Change the existing timber cladding material on external walls and existing cladding and decking on the balconies to non-materials."

The application seeks the specific materials to be verified as a planning condition.

As described above, the purpose of this application is to make changes to the exterior of the building to remove the combustible materials to ensure the safety of residents.

Document List

The following documents have been submitted via the Planning Portal (PP-15163481) to the Council as part of this application:

- Two Horsham Gates – Combined Covering Letter / Planning Statement / Design & Access Statement / Biodiversity Exemption Statement (This document);

- Completed CIL Form(s);
- 846-CDA-ZZ-00-DR-A-00-0100-REV 01-LOCATION PLAN;
- 846-CDA-ZZ-00-DR-A-02-0100-REV 01-EXISTING GROUND FLOOR PLAN;
- 846-CDA-ZZ-01-DR-A-02-0101-REV 01-EXISTING FIRST FLOOR PLAN;
- 846-CDA-ZZ-02-DR-A-02-0102-REV 01-EXISTING SECOND FLOOR PLAN;
- 846-CDA-ZZ-03-DR-A-02-0103-REV 01-EXISTING ROOF PLAN;
- 846-CDA-ZZ-XX-DR-A-02-0200-REV 01-EXISTING SOUTH & WEST ELEVATION;
- 846-CDA-ZZ-XX-DR-A-02-0201-REV 01-EXISTING NORTH & EAST ELEVATION;
- 846-CDA-ZZ-00-DR-A-05-0100-REV 01-PROPOSED GROUND FLOOR PLAN;
- 846-CDA-ZZ-01-DR-A-05-0101-REV 01-PROPOSED FIRST FLOOR PLAN;
- 846-CDA-ZZ-02-DR-A-05-0102-REV 01-PROPOSED SECOND FLOOR PLAN;
- 846-CDA-ZZ-03-DR-A-05-0103-REV 01-PROPOSED ROOF PLAN;
- 846-CDA-ZZ-XX-DR-A-05-0200-REV 01-PROPOSED SOUTH & WEST ELEVATION;
- 846-CDA-ZZ-XX-DR-A-05-0201-REV 01-PROPOSED NORTH & EAST ELEVATION;
- 846-CDA-ZZ-XX-DR-A-05-0800-REV 01-PROPOSED PRODUCT DETAILS.

A Fire Safety Report was carried out by *FRC* in November 2025 as part of the project. This has also been submitted to accompany the application

A planning fee of £1,083.00 (£91.00 inc. VAT & Planning Portal Service Charge) has been paid to the *Horsham District Council's* via the Planning Portal to register and validate the planning application.

Note of Importance

Please be aware, due to the presence combustible materials on a Higher Risk Building (HRB) the buildings occupants, owners / leaseholders (etc.) currently live or have apartments which are unsafe due. Therefore, the application is of the utmost importance.

Site Description



Above: Red Line Site Boundary of the 'unclaimed' / 'unregistered' land.

Source: Google Earth.

The application site is located on the northern side of North Street. The site comprises of five storey residential block of flats. The main building consists of timber cladding, rendered walls and an aluminium roof. The site does not fall within a conservation area nor is it positioned within the setting of a listed building.

Two Horsham Gate is a purpose-built residential block among three others. It is located at Two Horsham Gates, 126 North Street, Horsham RH13 5TU. This modern building and as mentioned consists of five levels. This includes; a lower ground floor, a ground floor, and four upper floors, reaching a height of approximately 15 meters to the topmost occupied level. The design incorporates two well-positioned stairways that facilitate essential access between all floors and serve as the primary escape routes during emergencies.

The building's façade is characterized by contemporary architectural materials of timber cladding, rendered walls and an aluminium roof. The site is conveniently situated near local amenities, including shops, cafes, and recreational areas, providing residents with a vibrant community atmosphere. The proximity to public transport links enhances accessibility to other parts of Horsham and nearby areas, making it an ideal location for individuals and families alike.

Relevant Planning History

Historically, the Site has been the subject of a series of permissions for its comprehensive redevelopment.

Table 1: Planning History at Two Horsham Gates, 126 North Street, Horsham, West Sussex, RH13 5TU		
Application Ref. No.	Application Description	Decision
DC/16/0313	Minor material amendment to planning permission: DC/15/0611 (Erection of 45 new residential dwellings in two blocks ranging from 3 to 4 storeys in height, with undercroft car parking and associated landscaping (to the rear of gate three and land formally gate one)) including alterations to the lower ground floor car park (including the removal of a residents gym), internal changes to the layout of Gate 1 and minor external changes to Gate 1.	Granted (03/08/2016)
DC/15/0611	Erection of 45 new residential dwellings in two blocks ranging from 3 to 4 storeys in height, with undercroft car parking and associated landscaping (to the rear of gate three and land formally gate one)	Granted (07/01/2016)

Planning History of Nearby Developments

This planning application follows two recent planning application(s) related to *One Horsham Gates, 126 North Street, Horsham, West Sussex, RH13 5TT*. The specific application(s) of relevance are listed in the table below for your reference for which *CREATE Planning & CREATE Design+Architecture* were appointed as both the 'Agent' and the 'Architect' respectively for these applications also.

Table 2: Neighbouring Planning History at One Horsham Gates, 126 North Street, Horsham, West Sussex, RH13 5TT		
Application Ref. No.	Application Description	Decision
DC/25/1015	Variation of conditions 1 and 3 of previously approved application reference DC/24/1545 (Replacement of the existing timber cladding material on external walls and within the window units to non-combustible aluminium cladding, replacement of the rendered wall to a similar material with non-combustible insulation, and the replacement of the existing aluminium roof to a similar material with non-combustible insulation) for amended plans and materials.	Granted (10/09/2025)
DC/24/1545	Replacement of the existing timber cladding material on external walls and within the window units to non-combustible aluminium cladding, replacement of the rendered wall to a similar material with non-combustible insulation, and the replacement of the existing aluminium roof to a similar material with non-combustible insulation.	Granted (22/01/2025)

CREATE Design+Architecture have also been involved in the construction works associated with these applications since the planning approvals were granted.

Proposal Overview

The proposal involves replacing the timber cladding with aluminium cladding. Timber is highly combustible and presents a fire hazard to residents. The proposed replacement material, aluminium, is fire-resistant and non-combustible which is the reason for this change. The aluminium cladding that is proposed is a wood affect material to ensure the visual aesthetic remains the same.

In addition to the above, the proposal seeks to change the rendered wall to a similar material with non-combustible insulation.

Added to the above the proposal seeks to replace the aluminium roof to a similar material with non-combustible insulation.

By making these changes the building will be de-risked from fire the spread of fire on the exterior of the building. Moreover, improving the safety of the occupants, visitors, and residents of the building.

Proposed Materials

The application seeks for the materials to be visually like for like or similar. The exact products to be used are not currently known and therefore it is requested for the materials to be agreed with the Local Planning Authority via the use of a Planning Condition.

Relevant Planning Policy Documents and Planning Policies

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise. The development plans for the Horsham District Council include:

- Horsham District Planning Framework (2015):
- Horsham District Local Plan (2023-40) (Regulation 19):

The Ministry of Housing and Communities Local Government (now the Department for Levelling Up, Housing & Communities) published the revised *National Planning Policy Framework* (NPPF) in December 2024. which sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is supported by the National Planning Practice Guidance (NPPG) which provides more detail to the policies of the NPPF. The NPPF and NPPG are material considerations in the determination of planning applications and appeals.

Horsham District Planning Framework (2015):

- Spatial Objective 9
- Spatial Objective 12
- Spatial Portrait
- Policy 1 - Strategic Policy: Sustainable Development

- Policy SD7 – Design
- Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
- Policy 32 - Strategic Policy: The Quality of New Development
- Policy 33 - Development Principles
- Policy 35 - Strategic Policy: Climate Change
- Policy 37 - Sustainable Construction

Horsham District Local Plan (2023-40) (Regulation 19):

- Strategic Policy 13: The Natural Environment and Landscape Character
- Strategic Policy 19: Development Quality
- Strategic Policy 20: Development Principles

Planning Considerations

The proposal is limited to the following planning considerations:

- Design
- Fire Safety

Design

The cantilevered balcony decking and sub structure has been designed to reduce the risk of fire spread. This will also provide less long-term building maintenance. This update does not impact any other areas i.e. roofs or residential terraces. Please note that all the changes proposed are limited to the elevations and therefore all internal arrangements remain unchanged.

Additionally, the proposal seeks to replace the composite timber decking and timber support structure and replace it with Aluminium Decking Board (ADB) supported by a steel substructure. The proposed decking colour is Western Red Cedar (KEF100 Flip Batten and KES10016 Geometric Slat 'Western Red Cedar' finish) as specified on the architectural drawings.

This applies to the cantilevered balconies only and not the residential terraces. This applies to the cantilevered balconies only and not the residential terraces

Fire Risk and Safety

The proposed building will ensure the safety of all of the residents, occupants, or owners (freehold or leasehold). It is of critical importance that the remediation works are undertaken as soon as possible subject to planning approval being given.

Biodiversity

The need for developments to achieve a Biodiversity Net Gain (BNG) became mandatory from 12th February 2024 under Environment Act 2021, Schedule 7A of the Town and Country Planning Act 1990. Under the Act it is required that all planning permissions granted in England have to deliver at least 10% biodiversity net gain (BNG) unless they meet the *De Minimis Exemption*.

Given the pre-development conditions of the site (all buildings and hardstanding), it is

considered that the proposal is classified under the *De Minimis Exemption* from BNG. The pre-development conditions are such that the site consists of hardstanding across the site. Therefore, there is no 'priority habitat' ecology on site which the development would impact. In addition, the development does not impact 25m² of habitats.

The De-Minimis Exemption of the BNG Legislation is set out in the Table below.

Table 3: Biodiversity Net Gain (BNG) De Minimis Exemption Legislation
URL Link: https://www.legislation.gov.uk/ukxi/2024/47/regulation/4/made
De minimis exemption 4.— <i>(1) The biodiversity gain planning condition does not apply in relation to planning permission for development which meets the first and second conditions.</i> <i>(2) The first condition is that the development does not impact an onsite priority habitat.</i> <i>(3) The second condition is that the development impacts—</i> <i>(a) less than 25 square metres of onsite habitat that has biodiversity value(1) greater than zero; and</i> <i>(b) less than 5 metres in length of onsite linear habitat.</i> <i>(4) For the purposes of this regulation—</i> <i>(a) “priority habitat” means a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006(2);</i> <i>(b) a habitat is impacted where the habitat is lost or degraded such that there is a decrease in the biodiversity value of that habitat;</i> <i>(c) “linear habitat” means the types of hedgerow habitat or watercourse habitat identified for the purposes of the biodiversity metric(3) (which are measured by length (expressed in kilometres) rather than area).</i> <i>(1) See paragraph 3 of Schedule 7A to the Town and Country Planning Act 1990 for the definition of “biodiversity value”.</i> <i>(2) 2006 c. 16; see the list published at https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england. A hard copy of the list is available from the DEFRA Helpline address given at the end of the explanatory note below.</i> <i>(3) See paragraph 4 of Schedule 7A to the Town and Country Planning Act 1990.</i> <i>I look forward to hearing from you.</i>

Assessing the De Minimis Exemption Legislation against the pre-development conditions (existing site conditions) it is concluded that the development proposal is exempt from Biodiversity Net Gain.

Transport & Highways

The proposal is in a highly sustainable location which is accessible by public transport. No changes are proposed to the existing transport arrangements at the Site.

Conclusion

It is our understanding that the proposal is fully compliant with both national and local planning policies as the proposed materials seek to make visually similar or like for like changes to the building. Where changes have some degree of difference, efforts were made for the most similar visual appearance as possible. Therefore, the change is considered to be classified as a minor change only.

There is no known reason the application should be dealt with outside the statutory time frame of 8-weeks. Therefore, it is expected that should there be any reason why the application cannot be dealt within the statutory determination period an Extension of Time (EoT) will need to be agreed between the Council and the Applicant via the Agent (CREATE). In this eventuality the allocated Case Officer at the Council should contact the Agent immediately.

We trust the information enclosed is sufficient to enable the application to be validated and determined within the statutory period, and we look forward to receiving confirmation of this shortly.

Furthermore, it is our understanding that the above details provide the *Horesham District Council* with enough information for the application to be considered and in the instance that further information is required or sought after we kindly request that the Council do not hesitate to get in contact.

Yours sincerely,

Isaac Gatley Associate BA (Hons) MArch MSc MRTPI

CREATE
PLANNING