Horsham District Council

DELEGATED APPLICATIONS - ASSESSMENT SHEET

APPLICATION NO./ADDRESS:
DC/25/0505
Wiltshires Farm, Pickhurst Lane, Pulborough, West Sussex, RH20 1DA

DESCRIPTION:
Conversion and extension of buildings to form a single dwelling

RELEVANT PLANNING HISTORY:

DC/23/1032	Install fixed line broadband electronic communications apparatus under Regulation 5 - 4 x 10M Wooden Pole	NO OBJECTION to Notification on 13.06.2023

The planning history for the land to the north is also considered relevant in this instance.

APP/Z3825/W/22/3293640	Appeal to the refusal of application DC/21/1264	Appeal dismissed on 23.06.2023
DC/22/0992	Variation to condition 5 of previously approved application reference DC/19/0591 (Demolition of an agricultural building and erection of a detached dwelling with associated access and landscaping) to allow for the removal of the agricultural building at pre-slab stage rather than pre-commencement.	Application Permitted on 20.07.2022
DC/21/1264	Demolition of an agricultural building and erection of a two-storey dwelling with associated access and landscaping.	Application Refused on 01.09.2021
DC/19/0591	Demolition of an agricultural building and erection of a detached dwelling with associated access and landscaping	Application Permitted on 22.11.2019
DC/17/0963	Prior Approval for a proposed change of use of agricultural building to a dwellinghouse	Prior Approval Required and PERMITTED on 23.06.2017

SITE AND SURROUNDS
The application site consists of the north eastern corner of a large agricultural field to the north of the hamlet of Codmore Hill. The site is approximately 0.13 hectares, and comprises of two vacant stone agricultural buildings, a small shed, and open grassland with a ditch running along the east of the site. The site is not physically demarked or subdivided from the remainer of the field.

The site is bound to the north and east by a dense line of vegetation trees, with the site giving way to the remainer of the field to the south and west. There is an existing detached residential dwelling immediately to the south and a cattle barn in the field to the north. This barn holds consent to be replaced by large detached dwelling (**DC/19/0591).**

Site access is via a field gate onto an unmade track / public right of way (PUL-1983) which runs along the east of the site and connects onto Pankhurst Lane to the North.

The wider landscape is rural and agricultural in character, comprising of patchwork of open fields, hedgerows and blocks of woodland.

DESCRIPTION OF THE APPLICATION

The proposal seeks to convert and extend two existing agricultural buildings to form a single storey dwelling. As proposed, the existing buildings would be connected by a glazed link with a zinc pitched roof link. A flat roof extension is proposed to the south, this would be clad in black timber with full length glazed doors on the southern and western elevations and a light grey fibre glass roof featuring two roof lights. The existing buildings are proposed to be re-roofed with plain clay tiles. Additional glazing is proposed on the southern and western elevations. All windows and doors are proposed to be black aluminium.

A new detached plant room / shed is also proposed to the south east of the dwellings. Submitted revelations show this to be of substantial contribution and to be timber clad.

Proposed landscaping includes a post and rail fence and boundary planting forming a new residential curtilage. A terrace and walkways are proposed to the south of the dwelling. To the south of the site, the proposal includes a bridge over the existing ditch, a solar array and three new trees.

Vehicle access is proposed to remain as existing with a new area of parking north of the dwelling. A new pedestrian gate is proposed with the eastern boundary.

The application initially sought to provide access from the north, however, during the application this was revised to retain the existing access gate to the east. It is noted that there remain some inaccuracies within the submitted plans which have not been updated to reflect this amendment.

RELEVANT PLANNING POLICIES

The National Planning Policy Framework (NPPF)

Horsham District Planning Framework (2015):

Policy 1 - Strategic Policy: Sustainable Development
Policy 2 - Strategic Policy: Strategic Development
Policy 3 - Strategic Policy: Development Hierarchy
Policy 4 - Strategic Policy: Settlement Expansion
Policy 15 - Strategic Policy: Housing Provision
Policy 16 - Strategic Policy: Meeting Local Housing Needs
Policy 24 - Strategic Policy: Environmental Protection
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character
Policy 26 - Strategic Policy: Countryside Protection
Policy 31 - Green Infrastructure and Biodiversity
Policy 32 - Strategic Policy: The Quality of New Development
Policy 33 - Development Principles
Policy 34 - Cultural and Heritage Assets
Policy 35 - Strategic Policy: Climate Change
Policy 36 - Strategic Policy: Appropriate Energy Use
Policy 37 - Sustainable Construction
Policy 38 - Strategic Policy: Flooding
Policy 39 - Strategic Policy: Infrastructure Provision
Policy 40 - Sustainable Transport
Policy 41 - Parking
Policy 42 - Strategic Policy: Inclusive Communities
Policy 43 - Community Facilities, Leisure and Recreation

Pulborough Neighbourhood Plan

Policy 1: A Spatial Plan for the Parish
Policy 15: Design
Policy 16: Water Neutrality

Horsham District Local Plan (2023-40) (Regulation 19):
Strategic Policy 1: Sustainable Development
Strategic Policy 2: Development Hierarchy
Strategic Policy 3: Settlement Expansion
Strategic Policy 6: Climate Change
Strategic Policy 7: Appropriate Energy Use
Strategic Policy 8: Sustainable Design and Construction
Strategic Policy 9: Water Neutrality
Strategic Policy 10: Flooding
Strategic Policy 11: Environmental Protection
Strategic Policy 12: Air Quality
Strategic Policy 13: The Natural Environment and Landscape Character
Strategic Policy 14: Countryside Protection
Strategic Policy 17: Green Infrastructure and Biodiversity
Policy 18: Local Green Space
Strategic Policy 19: Development Quality
Strategic Policy 20: Development Principles
Policy 21: Heritage Assets and Managing Change within the Historic Environment
Strategic Policy 23: Infrastructure Provision
Strategic Policy 24: Sustainable Transport
Policy 25: Parking
Strategic Policy 27: Inclusive Communities, Health and Wellbeing
Policy 28: Community Facilities, Leisure and Recreation
Strategic Policy 37: Housing Provision
Strategic Policy 38: Meeting Local Housing Needs
Policy 39: Affordable Housing
Policy 40: Improving Housing Standards in the District

West Sussex Joint Minerals Local Plan (2018)
Policy M9 - Safeguarding Minerals

Other Relevant Guidance and Policies:

- HDC Community Infrastructure Levy (CIL) Charging Schedule (2017)
- WSCC Supplementary Planning Guidance (September 2020) - revised county parking standards and transport contributions methodology
- Air Quality and Emissions Mitigation Guidance for Sussex (2020)
- HDC Planning Advice Note: Biodiversity and Green infrastructure (2022)
- Shaping Development in Horsham District Planning Advice Note (2025)

REPRESENTATIONS AND CONSULTATIONS RESPONSES
Where consultation responses have been summarised, it should be noted that Officers have had consideration of the full comments received, which are available to view on the public file at www.horsham.gov.uk.

Consultations:
INTERNAL CONSULTATIONS

HDC Environmental Health: No objection.
Environmental protection provided an initial comment (15/05/25) outline that commercial or agricultural buildings can be subject to significant contamination risks arising from their use, construction and storage of machinery equipment fuels or other chemicals. Potentially hazardous materials may also be incorporated in made ground, yards and hard standings. Information on these matters and a preliminary risk assessment including a site walkover was therefore requested to ensure the site can be made safe and suitable for the development.

Following this the applicant provided a Phase I Contamination Assessment for review. A subsequent and final comment has been provided by Environmental Health (03/07/25) raising no objection subject to Ground Contamination and External Lighting conditions.

HDC Arboriculture: No objection
Following an amendment to retain an existing hedgerow on site, the officer has raised no objection to the proposal.

HDC Landscape: Advice / Modification
Should the principle of development be found acceptable in the countryside location, the proposals are not considered to give rise to unacceptable landscape character and visual adverse effects, given the retention of existing landscape features and sensitive design. While the retention of the hedgerow is clear within the updated Site Plan, it remains proposed for removal in the other submitted documents, including the AIA.

Please note, given the high degree of visibility and proximity to Ancient Woodland (AW), light spill must be prevented in order to retain the rural character of the local landscape. These details may be secured via condition. See details below.

While the proposed development is not essential to the countryside location, the proposals are considered of a scale appropriate to the countryside character location and are unlikely to lead to a significant increase in the overall level of activity in the countryside, and are therefore largely compliant with the second part of Policy 26 of the HDPF.

The Officer echoes comments made by HDC's Arboriculturalist in regard to the retention of the hedgerow on the northern boundary, which will as a result adhere to the LCA planning and management guidelines under point 11 as well as Policies 25, 26 and 33 of the HDPF.

While it is regrettable that various existing trees have been removed from the site in recent years, thus partly eroding the landscape character, the existing vegetation groups G1 and G2 are proposed to be retained in the latest revision of the Proposed Site Plan (Drawing No. 1503/P04E), thereby maintaining the green infrastructure network and the field pattern.

In addition, proposals have been sensitively designed to minimise the appearance of urbanising form as experienced from PRoW 1989.

The addition of three new trees and extended scrub is welcomed, as is the addition of post and rail with hedging, the details of which can be secured via condition.

Due to the proximity of existing landscape features, as well as the high degree of visibility afforded given its position within the undulating landform and PRoW 1983 and 1989, any lighting design must be sensitive. Lighting details must ensure that light spill is prevented in order to retain the rural character of the local landscape and prevent indirect deterioration of key landscape features.

<u>OUTSIDE AGENCIES</u>
NatureSpace: Further Information Required
NatureSpace have outlined that the application site falls within an amber impact risk zone. There are 10 ponds within 500m of the development proposal, the closest of which are located onsite, 250m southeast and 378m west. Natural England Standing Advice guidance for local planning authorities advises that surveys on ponds up to 500m from development sites should be requested.

NatureSpace have reviewed the submitted Protected Species Walkover and Bat Assessment and concluded that they are not satisfied that the applicant has adequately demonstrated that there will no impact to great crested newts and/or their habitat as a result of the development being approved.

Therefore, in line with the guidance from Natural England (Great crested newts: District Level Licensing for development projects, Natural England, March 2021), there is a reasonable likelihood that great crested newts will be impacted by the development proposals and therefore, the applicant must either:

- Submit a NatureSpace Report or Certificate to demonstrate that the impacts of the proposed development can be addressed through Horsham District Council's District Licence. This method of licensing often removes the need for survey work and onsite mitigation for great crested newts as it provides compensation habitats off site (more details can be found at www.naturespaceuk.com); or
- Provide further information (survey of onsite pond), in line with Natural England's Standing Advice, to rule out impacts to great crested newts*, or demonstrate how any impacts can be addressed through appropriate mitigation/compensation proposals

WSCC Highways: Advice

Access and Parking

No alterations are proposed at the access point onto the Highway at Pickhurst Lane, over that previously commented upon by the LHA. Access and visibility are to remain as have previously been practised through the existing agricultural and residential uses. The principle of access at this location- via the footpath has been established within similar applications on the wider Wiltshires Farm site.

The site plot is demonstrated as currently having 2 separate points of access onto the footpath, the proposal seeks to make use of one of these access points and close off the second, southern access. Parking and turning appears achievable within the site sufficient to satisfy the likely demand generated by a property of this size. This would require 3 vehicular parking spaces. Vehicles will be able to egress onto Pickhurst Lane in a forward gear. Cycle parking has not been demonstrated within the associated plans, cycling may not appeal to those less confident or unexperienced cyclists but could be a viable alternative to more confident cyclists. The LPA may wish to consider if this is a reasonable request.

The Area PROW officer should be contacted regarding this proposal to ascertain if there are any considerations relating to the proposed access via the footpath.

Capacity

Considering the existing permitted agricultural usage in terms of highway safety and level of activity of the site, it is unlikely that this proposal to change to residential would have an adverse impact on the local highway network. From experience of other similar proposals, the LHA recognise that agricultural uses typically generate more vehicle movements compared with small residential developments. As such, there is no expectation for this proposal to give rise to any increase or material change in the character of traffic in the vicinity of the site.

Conclusion

The Local Highway Authority does not consider that the proposal would have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network, therefore is not contrary to the National Planning Policy Framework (paragraph 116), and that there are no transport grounds to resist the proposal. Should planning consent be granted, conditions securing parking and cycle parking are advised to be sealed alongside.

South Downs National Park Authority (SDNPA): No comment / Advice

Although the application site is located outside of the National Park, the Council has a statutory duty to consider the Purposes of the National Park when making its determination. The statutory purposes and duty of the National Park are:

Purpose 1: To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.

Purpose 2: To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

Duty: To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.

Natural England: No objection
Natural England considers that without appropriate mitigation the application would:

- have an adverse effect on the integrity of Arun Valley Special Area of Conservation (SAC), Special Protection (SPA) and Ramsar site.
- damage or destroy the interest features for which Amberley Wild Brooks Site of Special Scientific Interest (SSSI) and Pulborough Brooks SSSI have been notified.
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In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures should be secured:

- The delivery, management and maintenance of any measures identified in the applicant's water neutrality statement that are required to ensure that the proposed development will not result in increased levels of abstraction within the Sussex North Water Supply Zone.

Natural England advise that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.

WSCC Fire and Rescue: Advice
The nearest fire hydrant for the supply of water for firefighting is 260-metres away, 85 metes further than the 175 metre distance required for a domestic premises. If an alternative water supply for firefighting is to be considered it will need to conform with the details identified in Approved Document (AD-B) Volume 1:B5 section 14 and agreed with West Sussex Fire and Rescue.

Evidence will also be require to show the Fire Service vehicle access meets with the requirements identified in AD-B Volume 1:B5 Section 13.

Place Services Ecology: Further information required/Temporary holding objection
Place Services have reviewed the application and submitted Protected Species Walkover and Bat Assessment concluding that insufficient information has been provided to assess the proposal likely impact on the European Protected Species: Dormouse and Protected Species: reptiles.

It has also been noted that the proposal falls within 3.1k of the The Mens Special Area of Conservation (SAC) and 8.5km southeast of Ebernoe Common Special Area of Conservation (SAC). A HRA to assess the likely impacts on these designations is therefore required.

PUBLIC CONSULTATIONS:
No public representations received.

Pulborough Parish Council Comments:
No objection has been raised subject to resolution of Environmental Health and Ecology Comments relating to the likely impacts of development on designated sites, protected & Priority species and habitats and identification of proportionate mitigation.

PLANNING ASSESSMENT

Principle of development
As it stands, the main planning policy framework relevant to development on this site is the adopted development plan which comprises the Horsham District Planning Framework (HDPF, 2015), the Pulborough Neighbourhood Plan (PNP) and the National Planning Policy Framework (NPPF). These documents are the starting point for the assessment of the proposed development.

HDPF Policies 2 (Strategic Development), 3 (Development Hierarchy) and 4 (Settlement Expansion) in addition to PNP Policy 1 (A Spatial Plan for the Parish) collectively seek to ensure development is appropriately sited to retain the districts distinctive settlement pattern and rural landscape character.

HDPF Policy 3 outlines the settlement hierarchy of the district and establishes that development will be permitted within defined built-up area boundaries (BUABs). PNP Policy 1 specifically seeks to steer development to within defined BUABs of Pulborough.

HDPF Policy 26 (Countryside Protection) seeks to protect the rural character and undeveloped nature of the countryside against inappropriate development. Support is provided, however, for development outside of BUABs were there is an essential to its countryside location and also and in 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.

PNP Policy 1 also provides support for development outside of BUABs where the location of development conforms with other relevant policy, namely, the NPPF and HDPF Policy 26.

The application site is located outside any of the district's defined BUABs and is therefore considered within the open countryside. The site also not been allocated for residential development within the HDPF or PNP. Additionally, the proposed development of an open market dwelling is not considered to have demonstrated an essential need for a countryside location and would not meet and of additional criteria set within HDPF Policy 26.

As a result, development in this location would conflict with the requirements of HDPF Policies 2, 3, 4 and 26 and PNP Policy 1. As such, when considered against the development plan, the principle of development is not considered to be acceptable. The conflict with the adopted development plan carries significant weight against the proposal.

Notwithstanding this, NPPF (2024) paragraph 84c provides some provision for the development of isolated homes where 'the development would re-use redundant or disused buildings and enhance its immediate setting'.

In this instance, the proposal seeks to incorporate two disused agricultural buildings which the applicant has outlined are too small for modern agricultural practices. The existing agricultural buildings are modest in scale with a combined GIA of approximate 60 sqm. The proposed dwelling would have an approximate GIA of 132sqm, of which, approximately 60 sqm (45%) would comprise of the existing barns, and approximately 72 sqm (55%) would comprise of new built form. Therefore, whilst the proposal would re-use redundant buildings, which should be considered within the planning balance, the proposed residential scale would require substantial extension, alteration and new build form within an open countryside location.

Paragraph 84c additionally requires proposal to enhance the immediate setting, this will be reviewed in more detail under 'Design and Landscape Impact'.

<u>5-Year Housing Supply and presumption in favour</u>
The NPPF was updated in December 2024. NPPF paragraph 78 states that for local plans which are more than five years old from their date of adoption, local authorities should identify and update annually a supply of sites to provide a minimum of a 5 years' worth of housing provision, including an additional 5% buffer or a 20% buffer if the most recent Housing Delivery Test score is below 85% delivery over the last three years.

In April 2025, the Council published the latest Authority Monitoring Report (AMR) which revealed that the Council currently has a housing land supply of 1 year against current targets (1st April 2023 - 31st March 2024). In light of this, it is acknowledged that the Council is unable to demonstrate a full 5-year housing land supply, and it is recognised that this forms a material consideration in decision making which triggers the application of the 'tilted balance' at Paragraph 11d of the NPPF. In accordance with Paragraph 11d, the Council is required to grant permission unless either (or both) of the following limbs apply:

'(i) the application of policies in this Framework that protect areas or assets of importance provides a clear reason for refusing the development proposed; or

(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination '

The application of the 'tilted balance', therefore, applies a presumption in favour of sustainable development, and permission should be granted unless any adverse impacts of doing so would significantly outweigh the benefits, taking account of relevant national policies.

The Pulborough Neighbourhood Plan

NPPF Paragraphs 13 and 14 outline the continued relevance of Neighbourhood Plans in situations where the presumption of favour or 'tilted balance' applies. Paragraph 14 states:

'in situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:

a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and

b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70).'

The PNP was made in September 2025. There criteria (a) is complied with.

Policy 1 of the PNP states that '*the Neighbourhood Plan defines the Built-up Area Boundary of Pulborough, as shown on the Inset Map. Development proposals located inside this boundary will be supported provided they accord with the other provisions of the development plan. Development proposals outside of this boundary will be required to conform to development plan policies in respect of the control of development in the countryside*.'

Paragraph 4.6 states that '*this policy restates the established development plan principle of defining a built-up area boundary around the village of Pulborough (including Codmore Hill) to direct housing and other development within the boundary. Only development necessary and especially suited to the countryside will be appropriate beyond the boundary*.'

In addition, PNP Polices 2, 3, 4, 5a, 5b and 6 provide allocations for 258 dwellings. These allocations, in addition to those dwellings approved and under construction are considered sufficient to meet the identified housing need for the period to the year 2031 as established by a Housing Needs Survey Report undertaken by AECOM.

As such, it is the Authority's' view that at present, the above criteria (a) and (b) of Paragraph 14 of the NPPF are met and that the proposals conflict with the 'Made' Pulborough Neighbourhood, is considered likely to significantly and demonstrably outweigh the benefits of this proposal.

Shaping Development in Horsham District (SDPAN):

In light of the Council's inability to demonstrate a 5-year supply of deliverable housing sites, as in recognition of the key objective of Government policy to significantly boost the supply of homes, the Council has endorsed a Shaping Development in Horsham District (2025) advice note which now forms

a material planning consideration in decision making. The advice contained in the advice note is guidance only and does not form policy and does not alter the statutory decision-making framework.

The note sets out the weight that can be given to current and emerging local policy and has been produced to enable the Council to act proactively to continue to deliver housing in a sustainable manner. For development proposals located outside the defined BUAB, the SDPAN (at paragraph 5.12) echoes the requirements of HDPF Policy 4 and states that applications will be considered positively provided that all of the following criteria are met:

- The site adjoins the existing settlement edge as defined by the BUAB;
- The level of expansion is appropriate to the scale and function of the settlement the proposal relates to;
- The proposal demonstrates that it meets local housing needs or will assist the retention and enhancement of community facilities and services;
- The impact of the development individually or cumulatively does not prejudice comprehensive long-term development; and
- The development is contained within an existing defensible boundary and the landscape character features are maintained and enhanced.

This proposal would not meet all of the above criteria. Specifically due to the proposals isolated siting which is not adjacent to an existing BUAB and does not fall within an existing defensible boundary.

Principle of development - Conclusion

The application seeks the introduction of an open market dwelling outside the defined BUAB and on a site which has not been allocated for development with the adopted development plan, and without an essential need for a countryside location. The principle of development is therefore contrary Policies 2, 3, 4, and 26 of the Horsham District Planning Framework and Policy 1 of the 'made' Pulborough Neighbourhood Plan.

It is acknowledged that the Council is unable to demonstrate a full 5-year housing land supply, and a presumption in favour or 'tilted balance' is therefore engaged. This balance requires permission to be granted, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Notwithstanding this, the proposal is contrary a 'made' Neighbourhood Plan, which meets the criteria of NPPF Paragraph 14.

Whilst it is acknowledged that the proposal incorporates two redundant buildings, these buildings are not considered of be of a scale suitable for conversion and would require significant extension / alteration to achieve a residential scale.

It necessary to consider the proposal as a whole, including the benefits of the development. The following sections of this report consider all other detailed planning considerations, with the final section considering the overall Planning Balance.

It is noted that the consented dwelling to the north (DC/19/0591) was initially established within prior-approval application DC/17/0963, which sought the conversion of a large cattle barn. This barn was considered suitable for conversion by officers, establishing the principle of residential development. A subsequent application for a larger dwelling on the site was, however, later refused under DC/21/1264 and subsequently dismissed at appeal. This appeal (APP/Z3825/W/22/3293640) is considered a material consideration in this instance. The appeal was dismissed on the grounds that the proposed dwelling would be significantly harmful to the character and appearance of the surrounding area.

Design and Landscape Impact

HDPF Policies 25 and 26 seek to protect the natural environment and landscape character of the district, including the landform and development pattern, together with protected landscapes and habitats. Development will be required to protect, conserve and enhance landscape and townscape character, taking account of areas or features identified as being of landscape importance, individual settlement characteristics and settlement separation.

HDPF Policies 32 and 33, and PNP Policy 15 require development to be of a high standard of design and layout. Development proposals must be locally distinctive in character and respect the character of their surroundings. Where relevant, the scale, massing and appearance of development will be required to relate sympathetically with its built-surroundings, landscape, open spaces and to consider any impact on the skyline and important views. PNP Policy 15 additionally seeks development to give regard to the Pulborough Design principles and Guidelines.

NPPF Paragraph 84c requires proposal for the re-use of buildings in isolated locations to enhance the immediate setting.

As previously outlined, the application site is located within a predominantly rural and agricultural landscape, comprising of patchwork of open fields, hedgerows and blocks of woodland. A limited degree of residential development is location surrounding the site, this including an existing dwelling to the south, and planning permission the siting of a large detached dwelling to north.

The proposed dwelling would be of a contemporary and generally high quality design, incorporating two existing agricultural buildings, a linked element and a substantial flat roof extension to the south. The proposal has been reviewed by the Landscape officer who has noted that the design appears sensitive, including the addition of 3 new trees, post and rail fence and hedgerow, and seeks to minimise the appearance of urbanising form as experienced from PRoW 1989.

Notwithstanding this, the proposal would result in the siting of a residential dwelling in the open countryside and the subdivision of what is currently an open agricultural field to form a new residential curtilage. The proposal seeks to introduce domesticating features such as a terrace, walkways, outbuilding, parking, solar array and ornamental planting etc. These features would be residential in character and would remain at odds with the prevailing rural and agricultural character of the site. This domesticating influence would be visible from adjacent public rights of way, including the adjacent PRoW PUL-1983 and PUL-1989.

It is noted that this residential influence would be experienced in context of the residential dwelling to the south, and consented dwelling to the north. Once the dwellings to the north is developed, the proposed dwelling would sit between these dwellings forming a short row of three dwellings along PRoW PUL-1983.

Considering the above, whilst no objection has been raised by the Landscape officer it is considered there remains a degree of harm from the domestication of the countryside and to the landscapes rural and agricultural character.

Highways and Parking:
HDPF Policy 40 states that development will be supported if it is appropriate and in scale to the existing transport infrastructure, including public transport; is integrated with the wider network of routes, including public rights of way and cycle paths, and includes opportunities for sustainable transport.

HDPF Policy 41 states that adequate parking and facilities must be provided within developments to meet the needs of anticipated users. HDPF Policy 33(8) further requires, where appropriate, the incorporation of convenient, safe, and visually attractive areas for the parking of vehicles and cycles without dominating the development or its surroundings.

The Local Highways Authority (LHA) have been consulted on this application and have raised no objection.

The application site is proposed to be accessed via the existing field gate onto an unmade track / public right of way (PUL-1983) which connects onto Pickhurst Lane to the North. No changes are proposed to the existing site access, either onto the track, or at the junction with Pickhurst Lane.

The LHA have outlined that the proposed change of use from agricultural to residential it is unlikely to materially change in the character of traffic in the vicinity of the site.

Regarding parking, on-site vehicle parking is proposed to the north of the dwelling. The LHA have outlined that this arrangement appears acceptable for both parking and turning. No details of cycle parking have been provided, however, this could reasonably be secured via a suitably worded planning condition.

The proposal is, therefore, considered acceptable on Highways grounds subject to conditions to secure cycle parking and the proposal parking and accords with HDPF Policy 40 and 41.

Impact to the Public Right of Way
It is noted that the unmade track serves as a Public Right of Way (PRoW). Whilst the proposal would result in vehicle traffic associated with the dwelling along this Right of Way, the PRoW is currently used for agricultural vehicle movements. The LHA have outlined that that the proposal would not materially change in the character of traffic, particularly as only a single dwelling is proposed. This aspect of the proposal is therefore considered acceptable for a highways perspective, and is not considered to result in a material impact on the amenity value of users of the PRoW.

Amenity
Policy 33(2) (Development Principles) of the HDPF states that permission will be granted for development that does not cause unacceptable harm to the amenity of the occupiers/users of nearby properties and land.

The closest dwellings to the application site are an existing two-storey dwelling to the south, and the consented detached dwelling to the north. The proposed dwelling would be a single storey and would not present any concerns regarding the potential for overlooking, overshadowing or overbearing. The Authorities Environmental Health Officer has requested a condition is placed on any approved to restrict exterior lighting. With this condition in place, the proposal is not considered to result in an unacceptable loss of residential amenity and would accord with HDPF Policy 33.

Contaminated Land
The proposal seeks to incorporate two existing / disused agricultural buildings with the potential for significant contamination risks arising from their pervious use.

The applicant has therefore provided a Phase I Contamination Assessment which outlines a High level of risk due to the proposed residential use and the site history. The Authorities Environmental Health Officer has reviewed the application and Contamination Assessment. The officer has requested additional investigation works to ensure the sire can be made safe and suitable for the development. These could be secured via ground contamination conditions as set out within the officers comments.

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 ‘by March 2026’. 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.

Officers have undertaken an Appropriate Assessment which demonstrates that the anticipated increase in mains water consumption from this development, alongside all other development granted since the 31st October 2025, will not exceed 3,240,000 litres per day.

Accordingly, Officers consider that the proposed development will 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.

Ecology
Policy 31 of the HDPF states that development will be supported where it demonstrates that it maintains or enhances the existing network of green infrastructure. Development proposals will be required to contribute to the enhancement of existing biodiversity and should create and manage new habitats where appropriate.

Impact on protected species
The applicant has submitted a Protected Species Walkover and Bat Assessment (AEWC, March 2025) which has been reviewed by the Authorities Ecology Consultant. Within their comment, the Authorities Ecology Consultant have outlined that insufficient information has been provided to fully assess the proposal impact on protected species.

The site is situated between two areas of highly suitable Dormouse habitat, and therefore, impacts upon transient Dormice cannot be fully disregarded. The Authorities Ecologist has outlined that a survey for dormice and details of precautionary mitigation measures are required prior to determination. In addition, the site is considered to have suitability for use by reptile species including Common Lizard, Slow-worm and Grass Snake. An additional survey is therefore required to determine the presence/likely absence of reptiles. These details should be provided prior to determination to provide certainty of the proposals likely impacts on legally protected species, and to ensure any mitigation secured is appropriate.

Notwithstanding the above, it is note that the site mitigation, compensation and enhancements detailed within submitted walkover survey are considered acceptable and could be secured via planning condition.

It is noted that a reptile survey, dated October 2025, has been submitted by the applicant. This report was provided following communication that the application would be recommended for refusal on matters of principle. Given the late submission of this report, and that this would not overcome the principle reason for refusal, the survey has not been accepted by the Authority or reviewed by the Authority's Ecology Consultant. It is additionally noted that no dormouse survey has been submitted.

Therefore, insufficient information has been submitted to demonstrate the potential impact of the proposed development on statutory protected species and the proposal is contrary to Policy 31 of the Horsham District Local Plan (2015).

Impact on Great Created Newts
The development has been reviewed by NatureSpace, who have identified that the proposal falls within the amber impact risk zone for great crested newts (GCN), where there is highly suitable habitat and a high likelihood of GCN presence. In addition, ten ponds have been identified within 500 metres of the development site, the closest of which are located onsite, 250 metres to the southeast, and 378 metres to the west.

The applicant has submitted a Protected Species Walkover and Bat Assessment, which concludes that a site-specific survey and mitigation measures are not required for GCNs. However, NatureSpace have

disputed this conclusion, stating that, in light of the information provided and the site's suitability for GCNs, they are not satisfied that the applicant has adequately demonstrated that there will be no impact on great crested newts and/or their habitat as a result of the development being approved. They advise that additional survey work should be undertaken on the onsite pond, or alternatively, a licence should be obtained either through the Council's District Licensing scheme or via European Protected Species Licensing.

Impact on Internationally designated Sites
The site falls 3.1km southeast of the Mens Special Area of Conservation (SAC) and 8.5km southeast of Ebernoe Common SAC.

The buildings proposed for conversion are considered to lack Potential Roost Features, however, could be used opportunistically. The Authorities Ecologist is therefore satisfied with the methods set out within the Protected Species Walkover and Bat Assessment. These could be secured via condition in addition to a Wildlife Friendly Lighting Strategy.

A Habitats Regulations Assessment (HRA) has been produced on behalf of the Council which concludes that where the above conditions could be secured, "the project will avoid an Adverse Effect on the Integrity of the Habitats sites listed in this assessment, either alone or in combination with other plan and projects." Natural England have been consulted on this HRA.

Arboriculture
The Authority's Arboricultural officer initially raised an objection to the proposal due to the removal of a section of hedge along the northern boundary. This aspect of the proposal has subsequently been amended, and the hedge is now proposed to be retained addressing the officer's concerns.

Biodiversity Net Gain (BNG)
There is now a statutory requirement to provide a minimum of 10% Biodiversity Net Gain (BNG) on development sites for certain applications. The applicant has provided a Biodiversity Net Gain Assessment and site metric outlining that the proposal would result in the loss of onsite habitat including grassland, trees, scrub, and native hedgerow. The entire application site is proposed to be residential garden and is therefore not suitable for BNG enhancements on site. Offsite habitat is therefore proposed within adjacent and neighbouring fields under the ownership of the applicant. Proposed habitat includes 1.15 ha of 'other woodland; broadleaved', 0.11 ha of 'mixed scrub' and 30m of 'native hedgerow'. This would result in a net change of 137.14% for habitat units and 19.89% Hedgerow units. The proposal has therefore considered to achieve statutory BNG. Should the application be recommended for approval a Section 106 legal agreement secured by way of a Biodiversity Gain Plan Condition prior to the commencement of any works.

Conclusion and Planning Balance:
The application seeks the introduction of one open market dwelling outside the defined BUAB, on a site which has not been allocated for development with the adopted development plan, and without an essential need for a countryside location. The development is, therefore, contrary Policies 2, 3, 4, and 26 of the Horsham District Planning Framework and Policy 1 of the 'made' Pulborough Neighbourhood Plan. The principle of development is, therefore, considered unacceptable when considered against the development plan. This conflict is granted significant weight.

Notwithstanding this, NPPF Paragraph 84 c) provides support for the development of isolated homes where the development would 're-use redundant or disused buildings and enhance its immediate setting'. In this instance, the proposal seeks to incorporate two disused agricultural buildings. These buildings are modest in scale and would require substantial extension to achieve a building of residential scale. It is noted that the resultant dwelling would be over 50% new build.

NPPF paragraph 84 c) also requires proposals to 'enhance' their immediate setting. In this instance, the proposal would introduce a domesticating and residential influence / character to an open agricultural field, within a countryside location. It is noted that this residential character would be experienced within the context of the existing dwelling to the south, and the consented dwelling to the north, therefore, whilst this harm is not considered significant, a degree of harm to the landscapes rural

and agricultural character would remain. The proposal therefore cannot be considered to 'enhance' the setting for the purposes of NPPF Paragraph 84 c).

Given the above, whilst the proposal seeks to incorporate disused buildings, the proposal would require a significant degree of new build development, and would fail to enhance the setting. NPPF Paragraph 84 c) is therefore not considered to have been met.

It is acknowledged that the Council is unable to demonstrate a full 5-year housing land supply, and a presumption in favour or 'tilted balance' is therefore engaged. This balance requires permission to be granted, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

In this instance, the site is within the plan area of the 'made' Pulborough Neighbourhood Plan, which meets both criteria 'a' and 'b' of NPPF paragraph 14. As such, any conflict with the 'Made' Pulborough Neighbourhood Plan is considered 'likely' to significantly and demonstrably outweigh the benefits. It is acknowledged, that there may be instances where the benefits of a scheme outweigh the adverse impacts of allowing development that conflicts with the Neighbourhood Plan. In this instance, the scheme would provide one open market dwelling, providing only a modest housing supply contribution. This benefit is afforded limited weight.

It is noted that adverse impact in the context of Paragraph 14 is not simply technical, as per Paragraph 15 the planning system should be genuinely plan-led giving communities confidence that they can shape and influence sustainable development in the areas. This leads back to Paragraph 13 which advises that 'The application of the presumption has implications for the way communities engage in neighbourhood planning', with Paragraph 14 then providing the above neighbourhood plan protections in order to give reassurance to communities that neighbourhood planning is meaningful and worthwhile in the face of wider development pressures. Officers are, therefore, of the view that the conflict with the Neighbourhood Plan, in this instance, does significantly and demonstrably outweigh the acknowledged benefits of the proposal. Therefore, development of this site for housing in conflict with the Neighbourhood Plan remains unacceptable at this time.

In summary, the proposal seeks the siting of a new dwelling in the open countryside, contrary to Policies 2, 3, 4, and 26 of the Horsham District Planning Framework and Policy 1 of the 'made' Pulborough Neighbourhood Plan. Whilst the proposal would re-use redundant buildings this would require significant extension. In addition, due to the proposals domesticating influence, the dwelling cannot be considered to enhance its immediate setting. The proposal therefore fails to accord with NPPF Paragraph 84. Finally, whilst the council is unable to demonstrate a 5 year housing supply, the proposals conflict with the 'made' Pulborough 'neighbourhood plan would significantly and demonstrably outweigh the benefit afforded from the provision of a single dwelling. Given the above, it is concluded that the proposed scheme must be refused. The precise reasons for the Council's refusal are provided below.

It is additionally noted that insufficient information has been submitted to demonstrate the potential impact of the proposed development on reptiles and dormice which are statutory protected species. The proposal therefore fails to accord with Policy 31 of the Horsham District Planning Framework (2015),and paragraph 193 of the NPPF 2024.

Recommendation: Application Refused

Reason(s) for Refusal:

1. The proposed development is located beyond a defined built-up area boundary, involving a site not allocated for development within the Horsham District Planning Framework (2015) or the Pulborough Neighbourhood Plan (2017-2031). The proposed development is not considered to represent an essential form of development to a countryside location and would be contrary to the overarching spatial strategy of the development plan outlined at Policies 2, 4 and 26 of the Horsham District Planning Framework (2015). The scheme is also contrary to the Pulborough Neighbourhood Plan (Policy 1: A Spatial Plan for the Parish) in that it results in a development

beyond the built area boundary and does not conform with the Horsham District Planning Framework. The proposed development would also result ina degree of landsacpe harm and therefore fails to enhance the immediate setting in accordance with NPPF 84 c). Notwithstanding the absence of a five-year land housing supply and the provisions of the National Planning Policy Framework, there are deemed to be no material considerations which would sufficiently outweigh conflict with the above development plan policies in these regards. The proposal therefore fails to accord with Policies 2, 4, 25, 26, 32 and 33 of the Horsham District Planning Framework (2015), Policy 1 and 15 of the Pulborough Neighbourhood Plan (2015-2031) and the NPPF 2024.

2. Insufficient information has been submitted to demonstrate the potential impact of the proposed development on statutory protected species. The proposal therefore fails to accord with Policy 31 of the Horsham District Planning Framework (2015) and paragraph 193 of the NPPF 2024.

NOTE TO APPLICANT

POSITIVE AND PROACTIVE STATEMENT

Statement pursuant to Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. The Local Planning Authority has acted positively and proactively in determining this application by assessing the proposal against all material considerations, including planning policies and any representations that may have been received, in order to be able to, where possible, grant permission.

Plans list for: DC/25/0505
(The approved plans will form Condition 1 on the Decision Notice of all Permitted applications)

Schedule of plans/documents **approved**:

Plan Type	Description	Drawing Number	Received Date

Schedule of plans/documents **not approved**:

Plan Type	Description	Drawing Number	Received Date
Location plan		503/P01A	27.03.2025
Block plan	Existing	1503/P02A	27.03.2025
Block plan	Proposed	1503/P03A	27.03.2025
Site plan	Proposed	1503/P04C	27.03.2025
Floor plan	Proposed	1503/P05E	27.03.2025
Roof plan	Proposed	1503/P06	27.03.2025
Elevation plan	Proposed North and South	1503/P07C	27.03.2025
Elevation plan	Proposed East and West	1503/P08C	27.03.2025
Section plan	Proposed Section A-A	1503/P09A	27.03.2025
Section plan	Proposed B-B	1503/P10	27.03.2025
Supporting Statement	Planning	NONE	27.03.2025
Supporting Docs	Materials	1503/WFVMS01A	27.03.2025
Plans	Proposed Plant Room	1503/PRSE 01	27.03.2025
Supporting Statement	Water Neutrality	NONE	27.03.2025

Elevation plan	Existing	24007 E	27.03.2025
Floor plan	Existing	24007 G	27.03.2025
Roof plan	Existing	24007 R	27.03.2025
Site plan	Existing	24007	27.03.2025
Site plan	Site Analysis	1503/ESAP01A	27.03.2025
Supporting Statement	BNG Assessment and DHMMP	23-217	23.04.2025
Supporting Statement	Protected Species Walkover and Bat Assessment	23-217	27.03.2025
Supporting Statement	Arboricultural Impact and Preliminary Method	MDJAC-BS24117-AIAPMS-01	27.03.2025
Supporting Statement	BNG Metric Tool	NONE	23.04.2025
Supporting Statement	BNG Conditions Assessment	NONE	27.03.2025
Design & Access Statement		NONE	27.03.2025

DELEGATED

Case Officer sign/initial Sam Whitehouse Date: 28.11.2025

Authorising Officer sign/initial J Hawkes Date: 28.11.2025