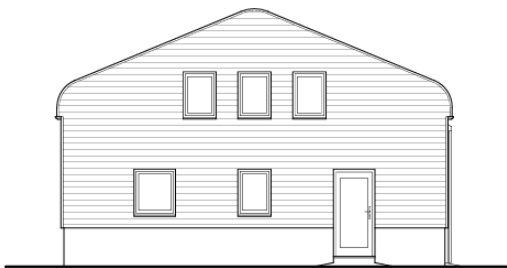


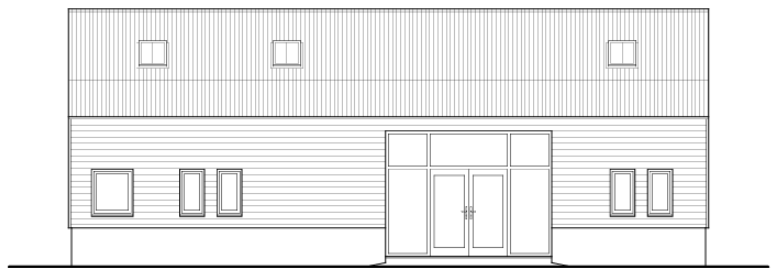
Planning Application

Proposed conversion of a disused and redundant rural building to a single dwellinghouse (Class C3) with erection of detached garage with ancillary accommodation within the roof space to be used as a home office, provision of a garden area and additional planting. Vehicular access provided to School Lane to the north of the site, and retention of access to existing paddocks to the south of the site.

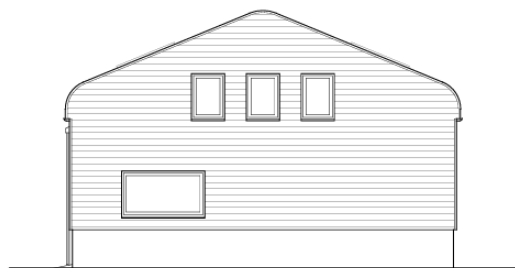
Batts Barn, School Lane, Ashurst, Steyning BN44 3AY



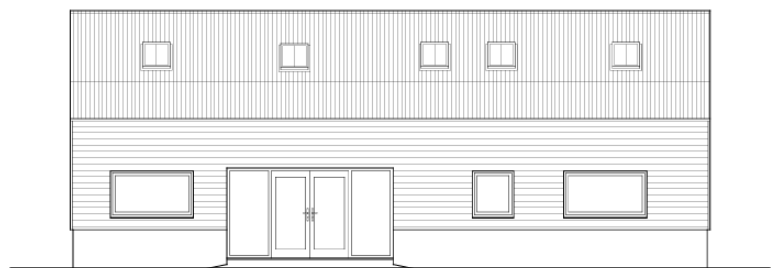
Proposed Side (East) Elevation - Scale 1:100



Proposed Front (North) Elevation - Scale 1:100



Proposed Side (West) Elevation - Scale 1:100



Proposed Rear (South) Elevation - Scale 1:100

Planning Statement prepared by Wilbury Planning Ltd

Applicant: Ruth Byrne

25 August 2026

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Planning Statement



1.0 Introduction

1.1 This Planning Statement accompanies a planning application (known as “*the application*” from hereon) for the following description of development (known as “*the proposed development*” from hereon):

- “*Proposed conversion of a disused and redundant rural building to a single dwellinghouse (Class C3) with erection of detached garage with ancillary accommodation within the roof space to be used as a home office, provision of a garden area and additional planting. Vehicular access provided to School Lane to the north of the site, and retention of access to existing paddocks to the south of the site.*”

1.2 The site is Batts Barn, School Lane, Ashurst, Steyning BN44 3AY. The application is made to Horsham District Council (HDC) on behalf of the applicant, Ruth Byrne.

1.3 The list of documents that accompany this application are referred to below:

Document	Author	Reference
Application Form	Wilbury Planning Ltd	PP-15022194
CIL Form 1: CIL Additional Information	Wilbury Planning Ltd	27/07/2026
CIL Form 7: Self-Build Exemption Claim Form - Part 1	Wilbury Planning Ltd	27/07/2026
Planning Statement	Wilbury Planning Ltd	25 August 2026
Structural Report	Monson Engineering Ltd	24316
Viability Report	Lawson Commercial Ltd	9 th April 2026
Preliminary Ground Contamination Risk Assessment Report	Ashdown Site Investigation Ltd	R17151 Issue No.1
Preliminary Ecological Appraisal & Preliminary Bat Roost Assessment	CT Ecology Ltd	26010
Location & Block Plan	Curtis Leeves Technical Ltd	LP01 P4
Existing Floor Plan, Roof Plan and Section	Curtis Leeves Technical Ltd	101 P1

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Existing Elevations	Curtis Leeves Technical Ltd	102 P1
Proposed Site Plan	Curtis Leeves Technical Ltd	LP02 P6
Proposed Ground, First Floor Plans, Roof Plans and Section	Curtis Leeves Technical Ltd	103 P4
Proposed Garage, Ground, First Floor Plans, Roof Plan and Elevations	Curtis Leeves Technical Ltd	105 P2
Proposed Elevations	Curtis Leeves Technical Ltd	104 P4

- 1.4 Submission of this application follows a pre-application enquiry undertaken with HDC in December 2025 (PE/25/0194 refers). Full details of this pre-application enquiry are found at Section 3.0 of this Planning Statement.

2.0 Site Description

- 2.1 Batts Barn comprises a disused and redundant rural building that is located within the setting of Ashurst.
- 2.2 HDC is in the process of adopting a new Local Plan (currently the draft Local Plan), with the latest timetable indicating that formal adoption will occur in January 2027. The draft Local Plan has identified secondary settlements, and in this instance includes the settlement of Ashurst. Secondary settlements are villages or hubs that have potential to provide some development. Batts Barn would abut the secondary settlement boundary line.

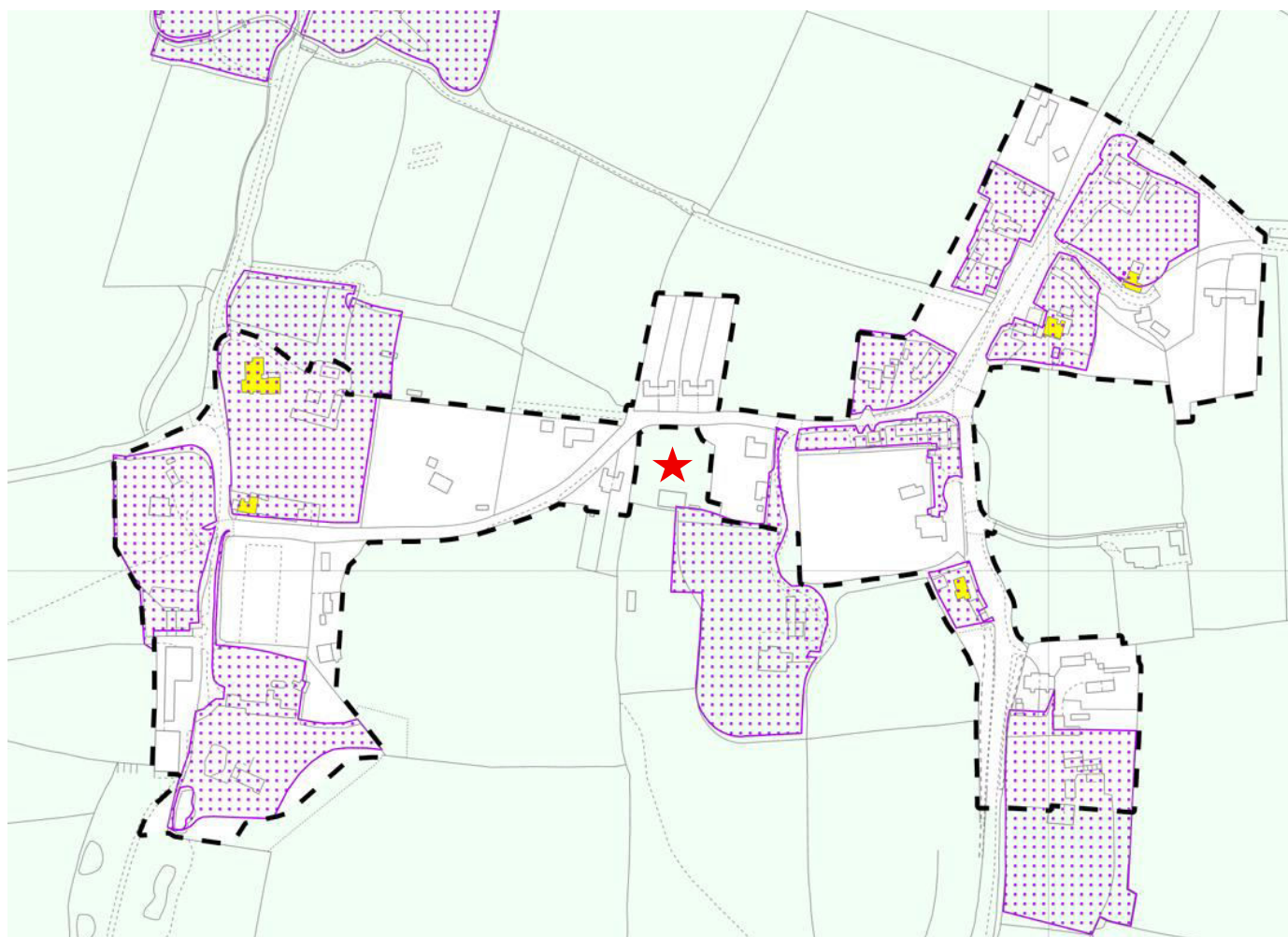


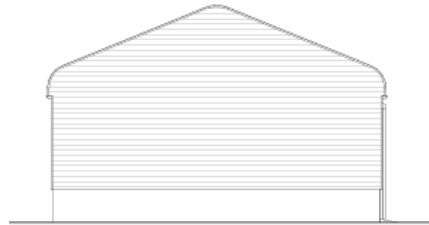
Figure 1: The pending secondary settlement boundary is denoted by the black dashed line. Batts Barn is denoted by the red star.

- 2.3 Batts Barn is rectangular in shape, comprising horizontal timber cladding over a low-level blockwork plinth, beneath a corrugated sheet roof with a distinctive curved eaves profile. Access into the building is presently provided via metal-framed sliding doors.
- 2.4 Access to the building is provided via School Lane to the north, and this follows the granting of planning permission in August 2022 for the creation of a single crossover (DC/22/0601 refers).
- 2.5 In December 1994, planning permission was granted for the change of use of the building to ancillary use to the main dwelling known as Batts to the south-east of Batts Barn (AH/10/94 refers).
- 2.6 The site is not located within an area of landscape constraint, and is not located within a Conservation Area. None of the trees within the vicinity are protected by Tree Preservation Order (TPO).
- 2.7 The site is within Flood Zone 1 as designated by the Environment Agency, and is at no risk of surface water flooding. Flood Zone 1 is the lowest flood risk zone.

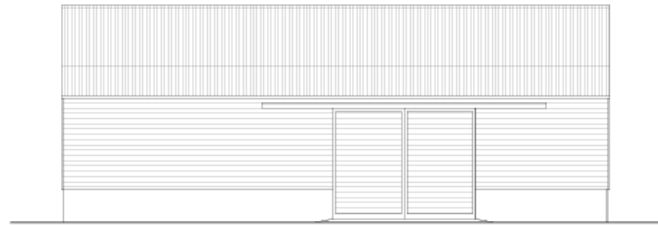


Figure 2: Batts Barn is denoted by the red line.

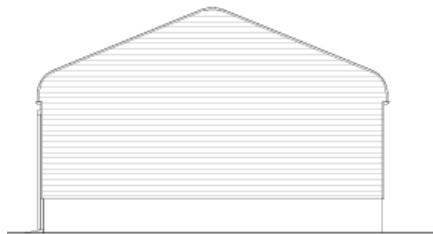
Batts Barn, School Lane, Ashurst, Steyning BN44 3AY
 Proposed conversion of disused and redundant rural building to a single dwellinghouse (Class C3) with erection of detached garage with ancillary accommodation within the roof space to be used as a home office, provision of a garden area and additional planting. Vehicular access provided to School Lane to the north of the site, and retention of access to existing paddocks to the south of the site.
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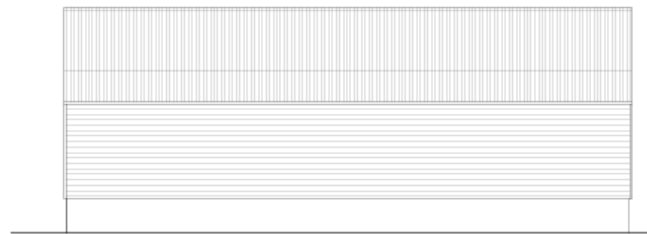
EXISTING SIDE (EAST) ELEVATION



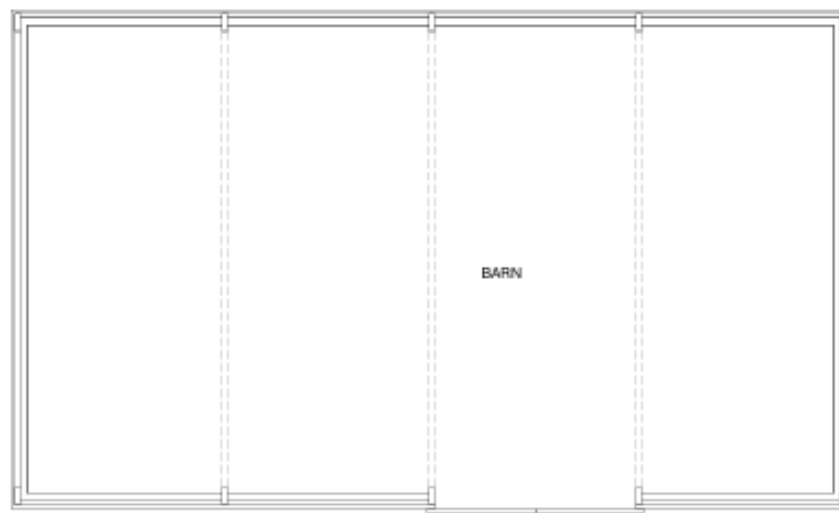
EXISTING FRONT (NORTH) ELEVATION



EXISTING SIDE (WEST) ELEVATION



EXISTING REAR (SOUTH) ELEVATION



EXISTING FLOOR PLAN

Figure 3: Existing GA Plans & Elevations (101 P1 and 102 P1).

Batts Barn, School Lane, Ashurst, Steyning BN44 3AY
Proposed conversion of disused and redundant rural building to a single dwellinghouse (Class C3) with erection of detached garage with ancillary accommodation within the roof space to be used as a home office, provision of a garden area and additional planting. Vehicular access provided to School Lane to the north of the site, and retention of access to existing paddocks to the south of the site.
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Planning**



Figure 4: Principal elevation.



Figure 5: Looking south-west across the site.

Batts Barn, School Lane, Ashurst, Steyning BN44 3AY
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Figure 6: Internal photograph.



Figure 7: Internal photograph.

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3.0 Relevant Planning History

3.1 A planning history search of the site reveals 2no. previous applications of relevance:

Address	Reference	Description	Decision
Batts Barn, School Lane, Ashurst	DC/22/0601	Creation of a single crossover for vehicle access from School Lane to the barn located on the Batts property.	Granted 12.08.2022
Batts Barn, School Lane, Ashurst	AH/10/94	Change of use of dutch barn to use ancillary to the main house and alterations to the cladding.	Granted 21.12.1994

Pre-Application Enquiry (PE/25/0194 refers)

3.2 A pre-application enquiry (PE/25/0194 refers) was submitted to HDC to test the in-principle acceptability of the conversion of Batts Barn to a single dwellinghouse (Class C3).

3.3 The pre-application written response was received from HDC officers on 16 December 2025. That response pre-dates both the National Planning Policy Framework published on 17 August 2026 and the amendments to the statutory biodiversity gain requirements which came into force on 6 August 2026, and the responses below are accordingly given by reference to current national planning policy. The written response considered the following (responses to each point are provided in green text):

- *The site lies outside the built-up area boundary and is, in policy terms, within the countryside. Policies 4 and 26 of the HDPF are therefore engaged and carry significant weight, and the proposal is contrary to these adopted policies. The Regulation 19 draft Local Plan currently attracts only limited weight.*

It is acknowledged that the site lies outside the built-up area boundary defined in the adopted HDPF, and that Policies 4 and 26 of the HDPF are engaged. The weight properly to be attributed to those policies has, however, changed. Annex A(2) of the National Planning Policy Framework published on 17 August 2026 provides that development plan policies which are materially inconsistent

with the national decision-making policies should be given very limited weight. To the extent that Policies 4 and 26 operate to preclude development of a kind for which policies S4 and S5 of the Framework now expressly provide, they fall to be given very limited weight. The principle of development is addressed in full at Section 6.0 of this Planning Statement, which sets out the case under policy S4 and, in the alternative, under policies S5(1)(c) and S5(1)(e), together with the weight now properly afforded to the emerging Local Plan.

- *The draft Local Plan identifies Ashurst as a secondary settlement, being a village or hub with the potential to accommodate some development, and the application site abuts the secondary settlement boundary. Although the site itself sits just outside that boundary — the building having previously read as an agricultural barn associated with the use to its rear — it is bound by other development and is unique in its siting. The “Shaping Development in Horsham District” advice note identifies where some development may be acceptable outside built-up area boundaries, and the proposal, being of modest scale, contained within a defensible boundary, causing no harm to landscape character, contributing to housing and amounting to an infill conversion of previously developed built form, is consistent with those intentions.*

The relationship of the site to the Ashurst secondary settlement boundary, and its infill character within a well-established boundary, is relied upon and developed within the planning assessment at Section 6.0. The definition of “settlement” at Annex B to the Framework expressly includes areas defined as a settlement in the development plan, whether using defined settlement boundaries or equivalent terms, and it is submitted that the site properly forms part of the settlement of Ashurst. In the alternative, the proposal comprises limited infilling within a group of houses for the purposes of policy S5(1)(e). The proposal is also consistent with the intentions for sustainable development identified in the “Shaping Development in Horsham District” advice note, as confirmed by officers within the pre-application written response.

- *Paragraph 84(c) of the NPPF supports the re-use of redundant or disused buildings where this enhances the immediate setting. The pre-application submission did not include landscaping, access or boundary details and, without these, the proposal did not demonstrate the enhancement of the immediate setting required by Paragraph 84(c); the conversion of a building*

does not of itself amount to such an enhancement. The applicant should also set out clearly how the building is redundant. The site is, in any event, not “isolated” in the truest sense, given the surrounding outbuildings and dwellings.

The application has been developed to demonstrate the enhancement of the immediate setting then required by Paragraph 84(c) of the December 2024 Framework, the successor to which is policy HO11(1)(c) of the Framework published on 17 August 2026. Officers rightly observed that the site is not “isolated” in the truest sense, given the surrounding outbuildings and dwellings; on that footing policy HO11 is not engaged at all, the proposal falling instead to be considered under policy S4 or, in the alternative, policy S5(1)(c) and policy S5(1)(e). Landscaping, access and boundary details, including the provision of a garden area and additional planting to the north of the building, and the retention of the existing vehicular access from School Lane (DC/22/0601 refers), are in any event shown on the Proposed Site Plan (LP02 P6), such that the enhancement of the immediate setting is demonstrated. The case for the building being disused and redundant is set out at Section 6.0 and is supported by the Structural Report (Monson Engineering Ltd, 24316), which also confirms that the building is of permanent and substantial construction for the purposes of policy S5(1)(c). The building has been used only for purposes ancillary to the main dwelling (Batts) since 1994 and, following the development of Batts under separate permissions, there is no longer a need for it to be retained for domestic storage. The structural form and external materials of the building will be retained, with external alterations limited to the insertion of a number of windows and rooflights, such that the proposal enhances rather than harms the immediate setting.

- *The benefit of one dwelling to the Council’s housing land supply is limited and would not, on its own, outweigh the identified conflict with Policies 2, 3, 4 and 26 of the HDPF. The acceptability of the proposal in principle is therefore finely balanced and would fall to be determined by the Planning Committee as a departure from the development plan. Officers indicated that, given the site abuts the secondary settlement identified in the draft Local Plan and would represent an infill development, an application in this form would be likely to attract an officer recommendation of approval, albeit determined by members rather than under delegated authority.*

Officers' assessment of the principle of development was made when the tilted balance at Paragraph 11(d) of the December 2024 Framework applied and when the emerging Local Plan stood at Regulation 19 stage. Under the Framework published on 17 August 2026, the operative test under both policy S4 and policy S5 is whether the benefits of approving the development would be substantially outweighed by any adverse effects, and the weight to be given to Policies 4 and 26 of the HDPF falls to be assessed under Annex A(2). The emerging Local Plan has in addition advanced to Main Modifications stage. It is acknowledged that the application may nonetheless fall to be determined by the Planning Committee. The assessment is set out at Section 6.0 and the conclusion at Section 7.0, which explain why the benefits of the scheme, taken together with the site's relationship to the Ashurst secondary settlement and its infill character, are not substantially outweighed by any adverse effects.

- *Policies 25, 32, 33 and 34 of the HDPF require high-quality design that is sympathetic to the character and distinctiveness of the site and its surroundings. The submitted elevations showed only minimal fenestration alterations, such that the building would read as a barn with domestic features added to each elevation. The retention of the form of the building does not necessarily amount to a visual improvement, and care should be taken to avoid an overtly domestic appearance and to maintain the rural character of the site, including through an appropriate landscaping scheme.*

The design approach is addressed in full at Section 6.0, by reference to Policies 25, 32, 33 and 34 of the HDPF and to policy DP3 of the Framework. The conversion retains the existing structural form, length, width, eaves and ridge height and external materials of the building, with external alterations limited to a number of window and rooflight openings that are not considered significant enough to harm the character and appearance of the locality. A garden area with soft landscaping and additional planting will be provided to the north of the building to ensure that it continues to read in its rural context and to avoid an overtly domestic appearance, consistent with the design approach shown on the Existing and Proposed GA Plans and Elevations.

- *Policy 31 of the HDPF and Circular 06/2005 require the presence or otherwise of protected species to be established before planning permission is granted. A Preliminary Ecological Appraisal (including a great crested newt survey)*

would be expected to accompany any application, and further site clearance should be avoided pending assessment by a suitably qualified ecologist.

A Preliminary Ecological Appraisal & Preliminary Bat Roost Assessment (which includes great crested newt surveys and mitigation) accompany this application. The applicant has had regard to officers' advice that further site clearance, including of the wood piles, should be avoided pending the ecological assessment, and is content to accept conditions securing appropriate ecological safeguards and enhancements. Ecology and biodiversity net gain are addressed further at Section 6.0, by reference to policy N2 of the Framework.

- *A statutory minimum of 10% Biodiversity Net Gain applies under the Environment Act 2021, assessed against the site's baseline biodiversity as at January 2021. It was discussed at the site meeting that, if registered as self-build, the development would be exempt from the mandatory Biodiversity Net Gain requirement; in any event, a Preliminary Ecological Appraisal would be expected.*

The position on biodiversity net gain has changed since the pre-application response. The exemption for self-build and custom housebuilding development was removed, and an exemption for small sites substituted in its place, by the Biodiversity Gain (Town and Country Planning) (Amendments and Transitional Provisions) (England) Regulations 2026, which came into force on 6 August 2026 and apply to applications made on or after that date. The application site extends to approximately 0.19 hectares and therefore falls below the 0.2 hectare threshold for the small sites exemption. The proposed development is accordingly exempt from the mandatory Biodiversity Net Gain requirement, as addressed in full at Section 6.0.

- 3.4 Officers' written pre-application response has been considered carefully and addressed in full as part of the assembly of this application.

4.0 Description of Development

4.1 This application seeks planning permission for the following:

- Proposed conversion of a disused and redundant rural building to a single dwellinghouse (Class C3).
- Erection of detached garage with ancillary accommodation within the roof space to be used as a home office.
- Provision of a garden area and additional planting.
- Vehicular access provided to School Lane to the north of the site.
- Retention of access to existing paddocks to the south of the site.

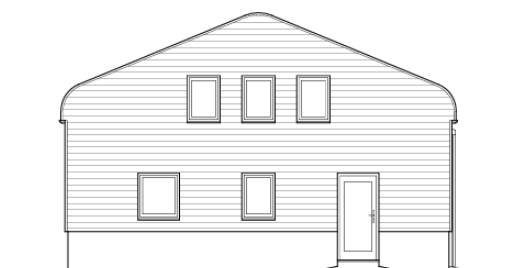
4.2 The proposed conversion would provide a four-bedroom dwelling arranged over two floors, with a Gross Internal Area (GIA) of approximately 214sqm (120sqm at ground floor and 94sqm at first floor). At ground floor, the accommodation would comprise an entrance hallway, an open-plan kitchen and dining area, a living space, a snug, a study, a utility room, a store room, a WC and ancillary cloaks and storage. A new first floor would be inserted within the existing roof space, providing a principal bedroom with en-suite, three further bedrooms, a family bathroom and a further en-suite, served by a central landing, with a void over part of the living space below.

4.3 The conversion would not result in any extension to the existing building, with its existing length, width, eaves height and ridge height all retained. External alterations would be limited to the insertion of a number of new windows and conservation-style rooflights, the latter fitted with automatic dusk-til-dawn blinds to limit light spill in this rural location. The existing corrugated roof with its curved eaves profile would be retained. The existing timber cladding would be retained and repaired as necessary and stained black; and the low-level blockwork would be rendered and painted dark grey, with new windows and doors of timber framing finished in black.

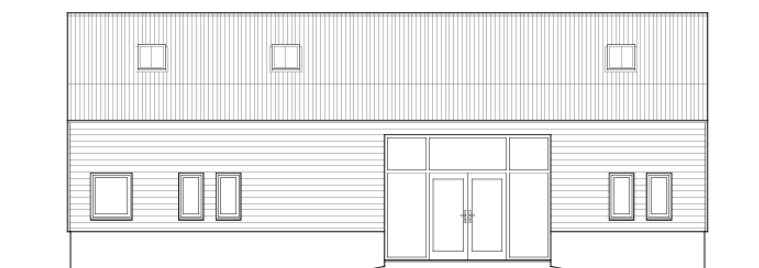
4.4 The detached garage would provide a garage, a garden store / workshop and a first-floor home office within the roof space, together with 2no. secure cycle spaces, a bin storage area and an electric vehicle charging point. It would be finished with a natural slate roof, timber cladding stained black and low-level red stock brickwork, with new timber-framed windows and doors painted black, such that it would read as a subordinate ancillary building that complements the converted barn.

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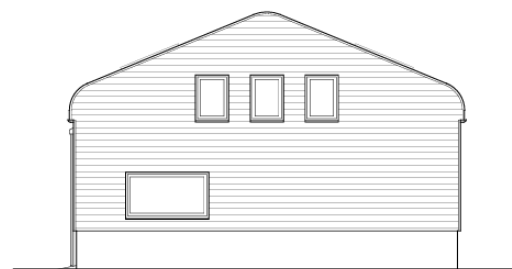
- 4.5 The existing vehicular access from School Lane to the north would be retained, with block paving at its junction with the highway and a permeable driveway surface beyond, and access would continue to be maintained through to the existing paddocks to the south. The associated landscaping scheme comprises areas of amenity lawn and native wildflower grassland, specimen tree planting, single-species native hedge planting, feature planting areas and sandstone paving, providing a soft rural setting for the dwelling.



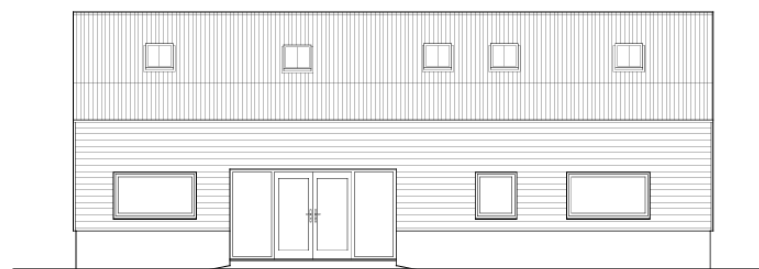
Proposed Side (East) Elevation - Scale 1:100



Proposed Front (North) Elevation - Scale 1:100



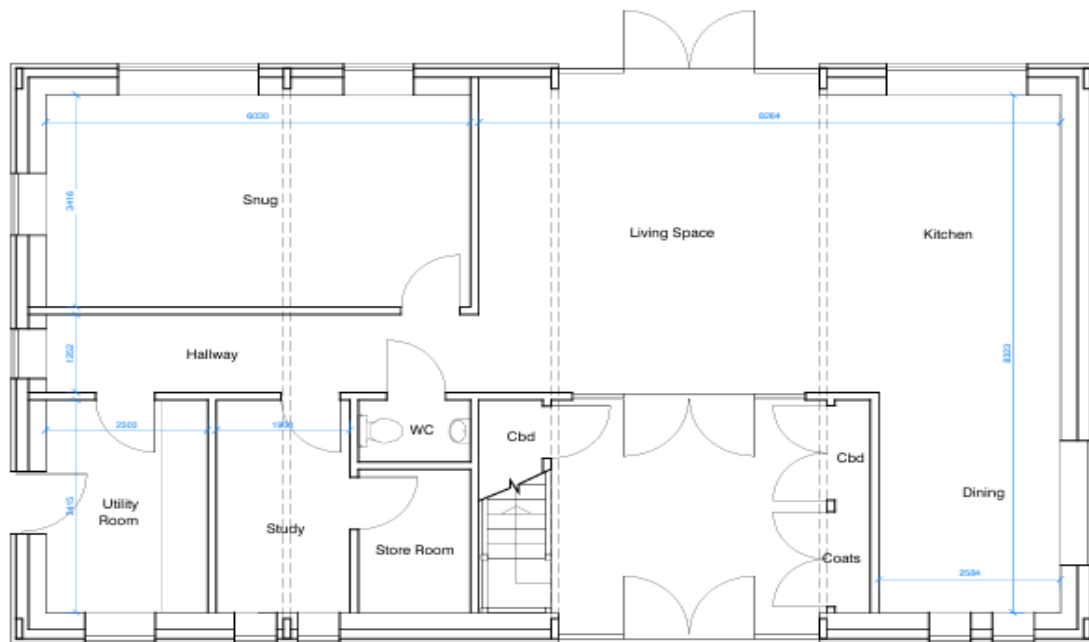
Proposed Side (West) Elevation - Scale 1:100



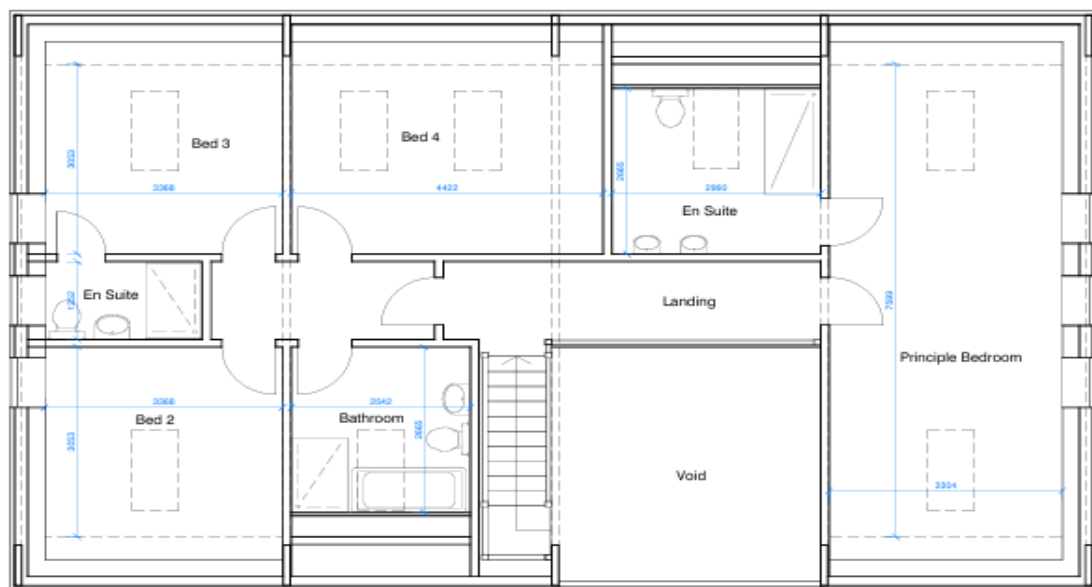
Proposed Rear (South) Elevation - Scale 1:100

Figure 8: Proposed Elevations (104 P4).

Batts Barn, School Lane, Ashurst, Steyning BN44 3AY
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Proposed Ground Floor Plan - Scale 1:100



Proposed First Floor Plan - Scale 1:100

Figure 9: Proposed Floor Plans (103 P4).

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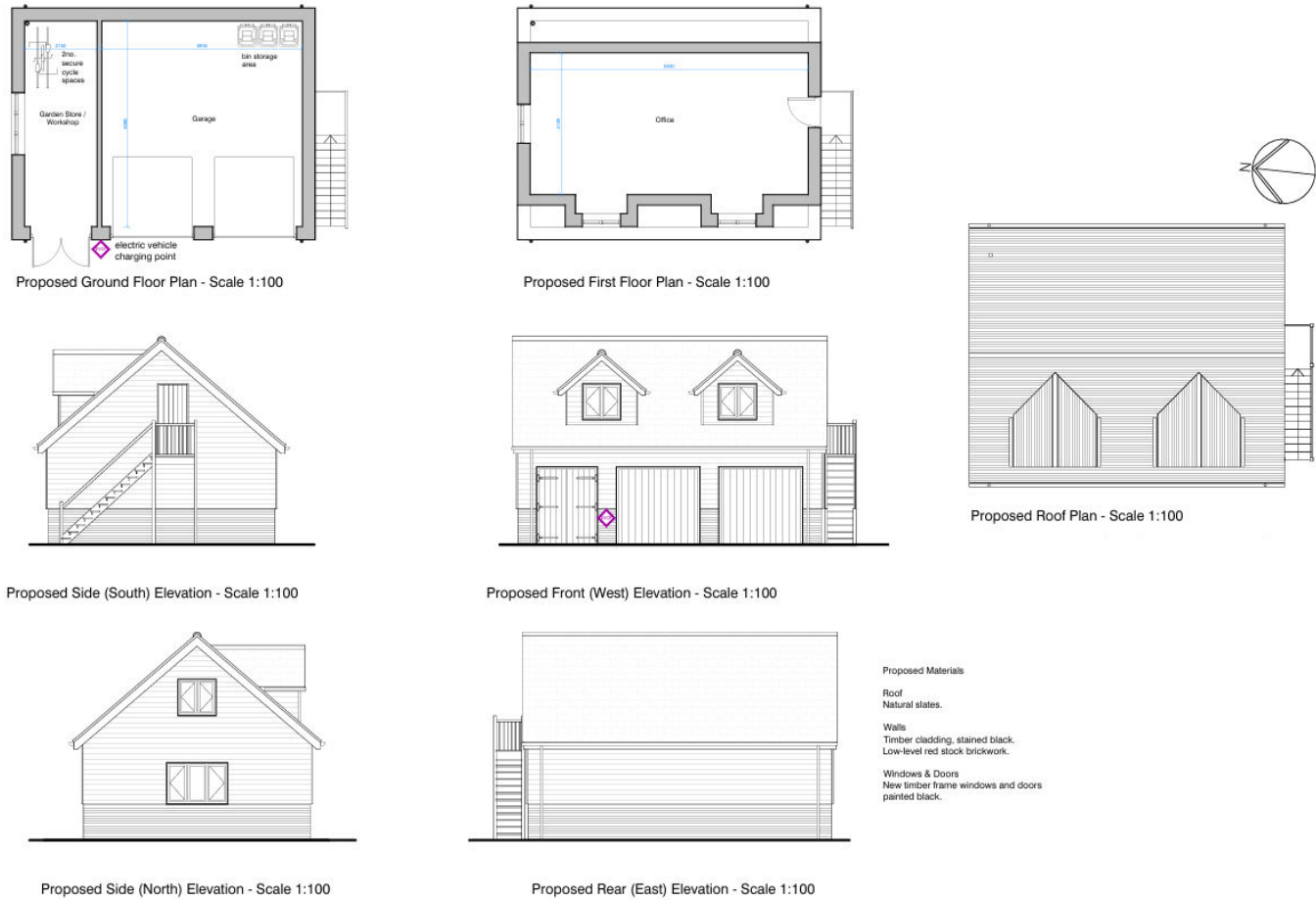


Figure 10: Proposed Garage Plans and Elevations (105 P2).

Batts Barn, School Lane, Ashurst, Steyning BN44 3AY
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Figure 11: Proposed Site Plan (LP02 P6).

5.0 Planning Policy Context

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, where the development plan contains relevant policies, an application for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan for the purposes of this application comprises the adopted Horsham District Planning Framework (2015).

5.2 The most pertinent national and local planning policies that relate to this application are referred to below:

The National Planning Policy Framework (NPPF) (August 2026)

5.3 The Framework was published on 17 August 2026 and replaces the version published in December 2024. The Framework distinguishes between plan-making policies and national decision-making policies, and the plan-making policies are not to be used when determining development proposals.

5.4 Annex A confirms that the policies of the Framework are material considerations which must be taken into account in decision-making from the day of its publication. There is no transitional period for decision-taking, and the Framework accordingly applies in full to the determination of this application.

Achieving sustainable development

5.5 Policy S3 provides that decisions on development proposals should apply a presumption in favour of sustainable development. The presumption now operates permanently, and through a location-based gateway: policy S4 is applied to development proposals within settlements; outside settlements, policy S5 is applied; and in all locations, proposals which accord with both an up-to-date development plan and the decision-making policies of the Framework should be approved without delay. Where a proposal falls partly within and partly outside a settlement, policies S4 and S5 are applied to the respective parts before an overall view is reached on the proposal.

5.6 Policy S4 provides that development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the

Framework. The circumstances in which the benefits are likely to be substantially outweighed are listed at policy S4(2) and are expressly not exhaustive; they include a failure to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.

5.7 Policy S5 applies outside settlements. It provides that only the forms of development set out in the list at policy S5(1) should be approved, and that these should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the Framework. The list includes, at policy S5(1)(c):

- *The reuse, extension, alteration or replacement of an existing building, provided that the existing building is of permanent and substantial construction, is lawful in planning terms, and any extension or alteration will not result in a disproportionate increase in size compared to the existing building.*

5.8 The list also includes, at policy S5(1)(d), the redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential) and, at policy S5(1)(e), limited infilling within groups of houses. Policy S5(2) applies the same non-exhaustive approach to adverse effects as policy S4(2). Policy S5(3) provides that development proposals comprising isolated homes, being those lying outside settlements or groups of houses, should not be approved other than in accordance with policy HO11. Policy S5(4) provides that proposals which do not fall within one of the listed categories should only be approved in exceptional circumstances, where the benefits would substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement.

5.9 The operative test in both policy S4 and policy S5 is therefore whether the benefits of approving the development would be substantially outweighed by any adverse effects. The tilted balance formerly found at Paragraph 11(d) of the December 2024 Framework, and the language of adverse impacts significantly and demonstrably outweighing the benefits, no longer form part of national policy.

5.10 “*Settlement*” is defined in the glossary at Annex B as including cities, towns, villages and other predominantly built-up areas, including land which is allocated or has permission for development which will form part of the built-up area once the

development is complete. The definition expressly includes areas defined as a settlement in the development plan, whether using defined settlement boundaries or equivalent terms, or criteria for identifying settlement extents where boundaries have yet to be defined. Hamlets and scattered groups of houses located outside predominantly built-up areas are excluded unless specifically defined as a settlement in the development plan. The Framework does not define “*isolated*”, and the approach of the Court of Appeal in *Braintree District Council v Secretary of State for Communities and Local Government* [2018] EWCA Civ 610, namely that the question is one of fact and planning judgment for the decision-maker, is considered to remain applicable.

Decision-making

- 5.11 Policy DM1(2) provides that development proposals other than major development should be supported by the minimum necessary information requirements to enable a decision, and that pre-application engagement may also be required where proposals raise complex planning matters.
- 5.12 Policy DM3 requires local planning authorities to work with applicants in a positive and proactive manner; to take a proportionate approach to the planning matters raised, reflecting their scale, complexity and potential impact; to take account of planning matters raised during pre-application engagement; to consider whether otherwise unacceptable development proposals could be made acceptable through the use of planning conditions or planning obligations; and not to refuse applications for development which should clearly be approved.
- 5.13 Policy DM4(1) provides that relevant policies in emerging development plans may be given weight according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the relevant policies, and the degree of compliance of those policies with the policies for plan-making in the Framework.

Delivering a sufficient supply of homes

- 5.14 Policy HO7 provides that, in applying the policies in the Framework, substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community, as identified through needs assessments prepared for the area of the local planning authority and other relevant evidence.

5.15 Rural housing is dealt with specifically by policy HO11, which provides that development proposals for isolated homes in the countryside should only be supported where one or more of the listed circumstances apply, including (inter alia):

- *The development would reuse a redundant or disused building and enhance its immediate setting, including proposals which would secure the long-term reuse of a vacant or underused listed building (subject to taking into account any harm to its significance, as set out in policy HE6).*

5.16 Policy HO11 is engaged only where the development proposal comprises an isolated home for the purposes of policy S5(3), being a home lying outside a settlement or a group of houses.

Promoting sustainable transport

5.17 Policy TR3 requires development proposals to reflect the principles for locating development in sustainable locations, taking into account the vision for the site, the type of development and its location. It provides, at policy TR3(1)(e), that opportunities to improve walking, wheeling, cycling and public transport and to enhance the connectivity of an area in rural areas should be taken where they exist and can be supported by the development proposed.

5.18 Policy TR4(1)(e) requires development proposals to provide a suitable number of parking spaces for a range of transport modes where appropriate, reflecting the location and nature of the development (including its connectivity), any locally-set standards in the development plan, and including adequate provision of spaces and infrastructure allowing for the charging of electric vehicles.

5.19 Policy TR6(4) provides that development proposals should be refused if they would have a severe adverse impact on the transport network, in terms of capacity and congestion including cumulative impacts, or an unacceptable impact on highway safety, taking into account any mitigation measures proposed as well as any wider network improvements.

Making effective use of land

- 5.20 Policy L2(1) provides that substantial weight should be given to the benefits where a development proposal would achieve one or more of the matters listed, including remediating despoiled, degraded, derelict, contaminated or unstable land, and making better use of vacant and underutilised land and buildings.
- 5.21 Policy L3(1) requires development proposals to make efficient use of land. Within settlements, proposals for residential and mixed-use development should contribute to an increase in the density of the area in which they are situated, the only exception being where there is a clear justification that this is either inappropriate or not possible. Outside settlements, development footprints should make the best use of a site's development potential, taking into account the policies in the Framework. Policy L3(4) provides that development proposals which do not make efficient use of land in accordance with policy L3(2) should be refused.

Achieving well-designed places

- 5.22 Policy DP3(1) requires development proposals to respond to their context, being the history, character and features of the site and its setting, so that they integrate with and enhance their surroundings, such as through the arrangement of development plots and buildings, the use of materials and architectural features, and the restoration, reuse and integration of heritage assets.
- 5.23 Policy DP3(2) requires development proposals to reflect the relevant aspects of the principles of liveability, climate, nature, movement, built form, public space and identity, as appropriate to the nature of the development and its location. Policy DP3(3) provides that development proposals should be refused if, without clear justification, they conflict with policy DP3(1) or the relevant aspects of the principles in policy DP3(2), or with any explicit design standards set out in the development plan; and that substantial weight should be given to compliance with relevant development plan policies when assessing the design quality of proposals.

Conserving and enhancing the natural environment

- 5.24 Policy N2(1) requires development proposals to contribute positively to the natural environment and to support nature's recovery, including by considering the

environmental qualities of the land proposed for development; conserving and enhancing existing natural features of visual, historic or nature conservation value, such as established trees and hedgerows; using appropriate landscaping to help create a well-designed place and integrate the development into its surroundings; and incorporating features which support priority or threatened species.

- 5.25 Policy N2(3) provides that development proposals may incorporate biodiversity enhancements which exceed the statutory objective for biodiversity net gain, but that this should only be a requirement where it is set out in up-to-date development plan policies for specific site allocations. Decision-makers should not give weight to other development plan policies which require biodiversity gains which go beyond the statutory framework, including where a policy requires gains for development proposals which are exempt.

Implementation and the weight to be given to the development plan

- 5.26 Annex A(2) provides that development plan policies, or parts of those policies, which are materially inconsistent with the national decision-making policies in the Framework should be given very limited weight. The only exception is where they have been examined and adopted, or made, against the 2026 Framework. Other development plan policies are not to be given reduced weight simply because they were adopted prior to its publication.
- 5.27 The HDPF was adopted in November 2015 and was examined against an earlier version of the Framework. Section 38(6) of the Planning and Compulsory Purchase Act 2004 is unaffected, and the application accordingly falls to be determined in accordance with the development plan unless material considerations indicate otherwise. The weight properly to be attributed to individual HDPF policies is, however, now to be assessed by reference to Annex A(2).

Horsham District Planning Framework (HDPF) (November 2015)

Sustainable development and the settlement hierarchy

- 5.28 The strategic approach to sustainable development and the spatial distribution of growth is set out in Policies 1, 2 and 3 of the HDPF. The application site lies outside

any defined built-up area boundary and therefore, in planning terms, comprises a countryside location.

Settlement expansion

5.29 Policy 4 addresses the expansion of settlements outside the built-up area. It provides that such development will only be supported where:

- *“The site adjoins an existing settlement edge, the level of expansion is appropriate to the scale and function of the settlement;*
- *The development is demonstrated to meet identified local housing needs;*
- *The impact, individually or cumulatively, does not prejudice comprehensive long-term development; and*
- *The development is contained within an existing defensible boundary, with landscape and townscape character features maintained and enhanced.”*

Rural economic development

5.30 Rural economic development is dealt with in Policy 10. The policy confirms that proposals for the conversion of rural buildings to business and commercial uses will be considered favourably over residential in the first instance.

The natural environment and landscape character

5.31 Policy 25 seeks to protect, conserve and enhance the landscape and townscape character of the District. Development is expected to be informed by, and to respond positively to, the landscape character of the area.

Green infrastructure and biodiversity

5.32 Policy 31 provides that development will be supported where it maintains or enhances the existing network of green infrastructure. Development proposals are required to contribute to the enhancement of existing biodiversity and, where appropriate, to create and manage new habitats.

Quality of new development

- 5.33 Policy 32 confirms that high quality and inclusive design will be required, and based on a clear understanding of the local, physical, social, economic, environmental and policy context for development.

Development principles

- 5.34 Policy 33 refers to the development principles, and lists the following requirements that development should be in compliance with (inter alia):
- *“Make efficient use of land, and prioritise the use of previously developed land and buildings whilst respecting any constraints that exist;*
 - *Ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land, for example through overlooking or noise, whilst having regard to the sensitivities of surrounding development;*
 - *Ensure that the scale, massing and appearance of the development is of a high standard of design and layout and where relevant relates sympathetically with the built surroundings, landscape, open spaces and routes within and adjoining the site, including any impact on the skyline and important views;*
 - *Are locally distinctive in character, respect the character of the surrounding area;*
 - *Use high standards of building materials, finishes and landscaping; and includes the provision of street furniture and public art where appropriate; and*
 - *Presume in favour of the retention of existing important landscape and natural features, for example trees, hedges, banks and watercourses. Development must relate sympathetically to the local landscape and justify and mitigate against any losses that may occur through the development.”*

Character and setting

- 5.35 Policy 34 is also of relevance to the design and character of the proposed development. Read together with Policies 25, 32 and 33, it requires development to be of a high standard of design that is sympathetic to the character and distinctiveness of the site and its surroundings.

Other relevant policies

- 5.36 Other policies of the HDPF of relevance to the proposed development include those dealing with flood risk and drainage, trees, hedgerows and landscaping, sustainable transport and parking provision, and sustainable design and construction. These matters are addressed, as relevant, within the Planning Assessment at Section 6.0.

Emerging Horsham District Local Plan

- 5.37 HDC is preparing a new Local Plan which, upon adoption, will replace the adopted Horsham District Planning Framework (2015). The emerging Local Plan is at an advanced Main Modifications stage.
- 5.38 In accordance with policy DM4(1) of the Framework, weight may be given to the policies of an emerging plan according to the stage of its preparation, the extent to which there are unresolved objections to the relevant policies, and the degree of compliance of those policies with the policies for plan-making in the Framework. The emerging Local Plan has advanced considerably since HDC's pre-application response, which was issued when the Plan stood at Regulation 19 stage and afforded it only limited weight. The Plan has since progressed through examination and now stands at the advanced Main Modifications stage, the examining Inspector having concluded that it is capable of being found sound subject to the main modifications proposed.
- 5.39 In accordance with policy DM4(1)(a) of the Framework, the more advanced the preparation of an emerging plan, the greater the weight that may be given to it. In this case the Plan having successfully passed examination and reached the final stage before its anticipated adoption in January 2027, this consideration is materially in its favour. The policies and designations of most relevance to this application, in particular the settlement hierarchy and the identification of Ashurst as a secondary settlement, are not subject of any unresolved objection, and are consistent with the aims of the Framework, such that the second and third criteria within policy DM4(1) are also satisfied.
- 5.40 It is therefore considered that, notwithstanding that a limited number of unrelated policies may remain in dispute, the emerging Local Plan is now capable of attracting significant weight as a material consideration in the determination of this application,

and materially greater weight than the limited weight properly afforded to it at the earlier Regulation 19 stage.

Secondary settlement boundary – Ashurst

- 5.41 Of particular relevance to the site, the emerging Local Plan introduces a tier of “*secondary settlements*”. These are villages or hubs identified as having the potential to accommodate some development, and identifies Ashurst as one such secondary settlement. The methodology underpinning these designations is set out in HDC’s evidence base, including the Local Plan Review Background Paper (February 2020), the Built-up Area Boundary Review and the Secondary Settlement Review.
- 5.42 The application site directly abuts the secondary settlement boundary of Ashurst. Although the site itself falls just outside the boundary as drawn, the building having historically read as an agricultural barn, it is bound by existing built development and is well related to the settlement. HDC’s “*Shaping Development in Horsham District*” advice note further identifies the circumstances in which some development may be acceptable outside built-up area boundaries. The relationship of the site to the Ashurst secondary settlement, together with the direction of travel of the emerging plan, are material considerations to which weight can be attributed in the determination of this application, as developed further within the Planning Assessment at Section 6.0.
- 5.43 For the purposes of the Framework, “*settlement*” is defined at Annex B as including villages and other predominantly built-up areas, and expressly includes areas defined as a settlement in the development plan, whether using defined settlement boundaries or equivalent terms, or criteria for identifying settlement extents where boundaries have yet to be defined. Whether the application site falls within the settlement of Ashurst, and accordingly whether policy S4 or policy S5 provides the operative gateway under policy S3, is a matter of fact and planning judgment for the decision-maker.

6.0 Planning Assessment

6.1 The material planning considerations associated with the application comprise the following:

- a) Principle of development;
- b) Aesthetic design and effects on visual amenity;
- c) Effects on residential amenity;
- d) Drainage and flood risk;
- e) Highway impact;
- f) Land contamination; and
- g) Ecology and biodiversity net gain requirements.

a) Principle of development

Settlement context and the operative policy gateway

6.2 Policy S3 of the Framework provides that decisions on development proposals should apply a presumption in favour of sustainable development, and that the operative gateway depends upon whether the proposal lies within or outside a settlement. Policy S4 is applied within settlements and policy S5 is applied outside them. The first question arising on this application is therefore whether the site falls within the settlement of Ashurst.

6.3 Ashurst is a village. It is identified as a secondary settlement within the emerging Local Plan, being a village or hub with the potential to accommodate some development, and the application site directly abuts the secondary settlement boundary as drawn. The definition of “*settlement*” at Annex B to the Framework includes villages and other predominantly built-up areas, and expressly includes areas defined as a settlement in the development plan, whether using defined settlement boundaries or equivalent terms. The Framework does not define “*isolated*”, and, consistent with the approach of the Court of Appeal in *Braintree District Council v Secretary of State for Communities and Local Government* [2018] EWCA Civ 610, the question is one of fact and planning judgment for the decision-maker.

6.4 The application site is bound by existing built development, the nearest residential properties comprising the dwelling known as Batts to the south-east and the properties fronting School Lane to the north and east. It is served by an existing vehicular access

onto School Lane formed pursuant to planning permission DC/22/0601, and it lies within the residential curtilage of the main dwelling. It is neither a hamlet nor a scattered group of houses located outside a predominantly built-up area. It is accordingly submitted that the site is properly to be regarded as forming part of the settlement of Ashurst for the purposes of the Framework, and that policy S4 provides the operative gateway.

- 6.5 On that basis, policy S4(1) provides that the development should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in the Framework. None of the circumstances listed at policy S4(2) arises on the facts of this application. The site is not allocated or safeguarded for another use; it does not comprise existing recreational land or facilities, Local Green Space, an area of particular importance for biodiversity or geodiversity, or land within a Protected Landscape; and the proposal does not involve the loss of undeveloped land used for a cemetery or burial ground, or for water storage or flood risk management. The proposal involves the conversion of an existing building rather than new development within a residential curtilage; but insofar as policy L2(1)(d) is engaged, the proposal accords with it, the only new built form being a single modest ancillary garage and the great majority of the site being retained as amenity lawn, native wildflower grassland and planting, as shown on the Proposed Site Plan (LP02 P6).
- 6.6 For the reasons set out at b) to g) below, the proposal does not fail to comply with any of the national decision-making policies which state that development proposals should be refused in specific circumstances.
- 6.7 In the event that the decision-maker were to conclude that the site lies outside the settlement of Ashurst, policy S5 would apply. The proposal falls squarely within the category at policy S5(1)(c), being the reuse of an existing building. The building is of permanent and substantial construction, as confirmed by the Structural Report prepared by Monson Engineering Limited (24316) which accompanies this application; it is lawful in planning terms, planning permission having been granted in December 1994 for the change of use of the building to a use ancillary to the main house (AH/10/94 refers); and no extension or alteration giving rise to a disproportionate increase in size is proposed, the conversion involving no extension whatsoever, with the existing length, width, eaves height and ridge height all retained.

- 6.8 The proposal would in addition fall within the category at policy S5(1)(e), being limited infilling within a group of houses, the site being contained within a well-established boundary and surrounded by existing residential development. Policy S5(1) provides that development falling within one of the listed categories should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects. For the reasons set out at b) to g) below, no such adverse effects arise, and the proposal does not fail to comply with any of the national decision-making policies which state that development proposals should be refused in specific circumstances, as required by policy S5(2).
- 6.9 Policy S5(3) provides that development proposals comprising isolated homes, being those lying outside settlements or groups of houses, should not be approved other than in accordance with policy HO11. The proposed dwelling would not be isolated: it lies within a group of houses and adjoins the settlement of Ashurst. Policy HO11 is therefore not engaged. Were the decision-maker to conclude otherwise, the proposal would in any event satisfy policy HO11(1)(c), in that it would reuse a redundant or disused building and would enhance its immediate setting, for the reasons set out at b) below.
- 6.10 Policy L3(1) requires development proposals to make efficient use of land, and policy L3(4) provides that proposals which do not do so in accordance with policy L3(2) should be refused. The proposal would create a dwelling on a site which presently contains none, thereby contributing to an increase in the density of the area in which it is situated; and it would make the best use of the site's development potential by converting the existing building without extension and confining new built form to a single modest ancillary garage. The proposal accordingly makes efficient use of land in accordance with policy L3.

Disuse and redundancy

- 6.11 The re-use of the building is supported by the Framework. Policy S5(1)(c) expressly provides for the reuse of an existing building outside settlements, and policy L2(1)(b) provides that substantial weight should be given to the benefits of making better use of vacant and underutilised land and buildings. Policy HO7 further provides that substantial weight should be given to the benefits of providing homes which will contribute towards meeting the evidenced accommodation needs of the community.

The proposed design concept, addressed at b) below, would additionally enhance the immediate setting of the building.

- 6.12 It is noted that Policy 10 of the HDPF seeks to favour the conversion of rural buildings to business and commercial uses over residential in the first instance.
- 6.13 Batts Barn is a disused and redundant rural building with its structural integrity intact. Since 1994, the building has been used for purposes ancillary to the main dwelling (i.e. Batts) to the south-east. However, following the extensive development of Batts relating to recent planning permissions, there is no longer a need for Batts Barn to be retained for domestic storage.
- 6.14 To make the most efficient use of the site, it is proposed to convert the building to a single dwelling that in turn would make a modest yet tangible contribution to the housing supply of Horsham District.
- 6.15 The siting, layout, size and residential setting of Batts Barn do not lend themselves to a viable or appropriate business or commercial use. This is confirmed by the Viability Report prepared by Lawson Commercial (Robert Prall AssocRICS), dated 9 April 2026, which accompanies this application. The report considers the following:
- Commercial demand in Ashurst is very limited, with no commercial premises in School Lane and the nearest established commercial location lying some 3 miles away at Partridge Green;
 - Demand for small, stand-alone commercial units in village locations is weak and local rental values are low; and
 - The building, which presently has no services and lies within the residential curtilage of the main house, could only be brought into commercial use following a change of use and the installation of services (including electricity and a foul water treatment plant), the cost of which would be likely to outstrip the rent achievable.

The report concludes that, in its current form, the building could not be marketed for commercial use, and that this rural location, with narrow access onto a quiet residential lane close to the village primary school, is an unsuitable and uneconomic location for new business premises, the introduction of which would also risk harming the character and safety of the lane.

- 6.16 It is considered that the proposed use of Batts Barn as a single dwelling would make the most effective and efficient use of an otherwise disused and redundant building. Should the building not be converted to a dwelling, then it would likely remain disused and redundant in the long-term.
- 6.17 Accordingly, the alternative of a commercial or business re-use of the building has been properly tested and found to be neither viable nor appropriate, such that the requirement of Policy 10 of the HDPF to consider such uses in the first instance is satisfied.
- 6.18 The written pre-application response identified conflict with Policies 2, 3, 4 and 26 of the HDPF, which restrict development outside built-up area boundaries. Those policies were adopted in November 2015 and were examined against an earlier version of the Framework. Annex A(2) of the Framework provides that development plan policies, or parts of those policies, which are materially inconsistent with the national decision-making policies should be given very limited weight. To the extent that Policies 4 and 26 of the HDPF operate to preclude development of a kind for which policies S4 and S5 of the Framework now expressly provide, they are materially inconsistent with the national decision-making policies and should be given very limited weight. The planned approach under section 38(6) of the Planning and Compulsory Purchase Act 2004 is unaffected, and the development plan falls to be read as a whole.
- 6.19 For the reasons set out above, the conversion of Batts Barn to a single dwelling is considered to be acceptable in principle, whether the site is treated as falling within the settlement of Ashurst, and so within policy S4, or outside it, and so within policies S5(1)(c) and S5(1)(e), and having regard to the development plan read as a whole.

b) Aesthetic design and effects on visual amenity

- 6.20 The design approach to the proposed conversion is shown on the suite of drawings prepared by Curtis Leeves Technical Ltd which accompany this application. At the local planning policy level, the design of the development falls to be assessed against Policies 25, 32, 33 and 34 of the HDPF, and at the national planning policy level against policy DP3 of the Framework. Policy DP3(3) provides that development proposals should be refused if, without clear justification, they conflict with policy DP3(1) or the relevant aspects of the principles at policy DP3(2), or with any explicit design standards set out in the development plan. Consideration is also given below to whether the

proposed development would enhance the immediate setting of the building, that being a requirement of policy HO11(1)(c) in the event that policy is engaged.

6.21 The suitability of the building for conversion whilst retaining its existing external form is confirmed by the Structural Report (24316) prepared by Monson Engineering Limited which accompanies this application, and which concludes that:

- The condition of the roof, walls and slab were very good. The lack of cracking in the external block walls suggests that there has been very little movement in the foundations.
- Conversion of the building will involve lining the external walls with an inner leaf with insulation and possibly the application of insulation under new finishes to the floor. The roof would also require upgraded insulation. Any design for additional structural members can be made once the architectural layout has been detailed.
- The building can be converted to living accommodation without the need for excessive structural modification.

6.22 The structural condition of the building therefore enables its conversion without demolition or rebuilding, such that its existing agricultural form is retained in its entirety. As shown on the Existing and Proposed Elevations (102 P1 and 104 P4) and the Proposed Ground and First Floor Plans, Roof Plan and Section (103 P4), the conversion would involve no extension to the building, with its existing length, width, eaves height and ridge height, and its distinctive corrugated roof with curved eaves profile, all retained; the new first floor would be inserted wholly within the existing roof volume.

6.23 External alterations would be limited to the insertion of a number of new windows and conservation-style rooflights. The existing timber cladding would be retained and repaired as necessary and stained black, the low-level blockwork would be rendered and painted dark grey, the existing corrugated roof and curved eaves profile would be retained, and new windows and doors would be of timber framing finished in black. This predominantly dark and recessive palette of materials, read together with the retention of the building's agricultural massing and roofscape, would ensure that the converted

building continues to read as a barn within its rural surroundings rather than as an overtly domestic dwelling.

- 6.24 The detached garage would be subordinate in scale to the converted barn and would be finished in a complementary palette comprising a natural slate roof, black-stained timber cladding and low-level red stock brickwork, with black-painted timber-framed windows and doors, such that it would read as an ancillary building appropriate to its rural context.
- 6.25 The new window and rooflight openings have been kept to the minimum necessary to serve the accommodation and are modest in number and scale relative to the elevations as a whole. The conservation-style rooflights are to be fitted with automatic dusk-til-dawn blinds, limiting light spill from the roof slopes in this countryside location. The openings would not be significant enough to cause an undue impact on the local landscape setting, or to detract from the character and appearance of the locality.
- 6.26 The setting of the building would be enhanced by a comprehensive soft landscaping scheme. This comprises areas of amenity lawn and native wildflower grassland, specimen tree planting, single-species native hedge planting and feature planting areas, together with sandstone paving, a permeable driveway surface and block paving at the junction with the highway. The scheme provides a soft, rural setting for the dwelling, particularly to the north, that would assimilate the building into its surroundings, reinforce the rural character of the site and avoid an overtly domestic appearance.
- 6.27 These matters respond directly to the written pre-application response received from HDC (PE/25/0194 refers), the material points of which are set out at Section 3.0 of this Statement. Officers advised that the pre-application submission did not include landscaping, access or boundary details and so did not, at that stage, demonstrate the enhancement of the immediate setting then required by Paragraph 84(c) of the December 2024 Framework, now policy HO11(1)(c), and that care should be taken to avoid an overtly domestic appearance and to maintain the rural character of the site, including through an appropriate landscaping scheme, having regard to Policies 25, 32, 33 and 34 of the HDPF.
- 6.28 The application has been developed to address that advice insofar landscaping, access and boundary details are now provided on the Proposed Site Plan (LP02 P6). The existing vehicular access from School Lane (DC/22/0601 refers) is retained; and the

design retains the building's agricultural form and employs a recessive palette of materials, complemented by the soft landscaping scheme, so as to maintain the rural character of the site.

- 6.29 Taken together, the retention of the building's existing agricultural form and roofscape, the repair of its external fabric, the recessive palette of materials, the restrained approach to fenestration, and the comprehensive soft landscaping and boundary treatment now proposed, would enhance the immediate setting of the building beyond its present disused and functional condition. The proposed development accordingly satisfies the requirement of policy HO11(1)(c) of the Framework that the reuse of the building enhance its immediate setting, in the event that policy is engaged, and responds directly to policy DP3(1) in integrating with and enhancing its surroundings.
- 6.30 For these reasons, the proposed development would not harm, and would positively enhance, the character and appearance of the building and its rural surroundings, and accords with Policies 25, 32, 33 and 34 of the HDPF and policies DP3 and N2(1) of the Framework.

c) Effects on residential amenity

- 6.31 At the local planning policy level, Policy 33 of the HDPF requires development to be designed so as to avoid unacceptable harm to the amenity of the occupiers and users of nearby property and land, for example through overlooking or noise.
- 6.32 At the national planning policy level, policy P3(2)(a) of the Framework requires development proposals to provide healthy living conditions for occupiers and users, and policy P3(2)(b) provides that proposals should not give rise to, or contribute to, an unacceptable level of access to daylight and sunlight for neighbouring residents and occupiers, or to unacceptable levels of noise, artificial light or other forms of pollution. Policy DP3(2)(a) further requires development to support communities which will function well over the lifetime of the development.
- 6.33 The building sits within a generous plot that is bounded by other development. The nearest residential properties comprise the dwelling known as Batts to the south-east and the properties fronting School Lane to the north and east.

- 6.34 The conversion element of the proposal would result in no increase in the footprint of the existing building, with its existing length, width, eaves height and ridge height all retained. The converted building would not, therefore, present any greater built form towards neighbouring properties than the existing barn, and would give rise to no overbearing impact, loss of light or loss of outlook to any neighbouring occupier. The only element of new built form is the proposed detached garage. This is a modest, subordinate ancillary building, 1.5 storeys in form and clearly subordinate to the converted barn and to the dwelling it would serve.
- 6.35 As shown on the Proposed Site Plan, the garage would be sited well within the plot, set back from the site boundaries and substantially separated from the nearest residential properties, being the dwelling known as Batts to the south-east and the properties fronting School Lane to the north and east
- 6.36 Its doors and the principal openings serving the first-floor office are oriented towards the interior of the site and the access rather than towards neighbouring dwellings, and the intervening boundary treatments and soft landscaping shown on the Proposed Site Plan would further soften and screen it.
- 6.37 Having regard to its modest scale, ancillary form, siting and the separation distances involved, the detached garage would not appear overbearing, nor would it result in any material loss of light or outlook to any neighbouring occupier. Given that the first-floor office is lit principally by dormer and gable windows facing into the site, and having regard to those separation distances and the intervening landscaping, it would likewise give rise to no harmful overlooking or material loss of privacy.
- 6.38 The use of the building as a single dwelling would be a low-intensity residential use that is entirely characteristic of the locality, and would not generate noise or disturbance beyond that ordinarily associated with a single household.
- 6.39 The proposed development would not give rise to any unacceptable impact on the amenity of neighbouring occupiers, and accordingly accords with Policy 33 of the HDPF and policies P3 and DP3 of the Framework.

d) Drainage and flood risk

Flood risk

- 6.40 As confirmed at Section 2.0 of this Statement, the site lies within Flood Zone 1, which is the lowest category of flood risk as designated by the Environment Agency, and is at no risk of surface water flooding.
- 6.41 Residential development is an appropriate use within Flood Zone 1, and the proposal is consistent with the risk-based, sequential approach to flood risk set out at policies F4 and F5 of the Framework. Policy F4(2) requires a site-specific flood risk assessment to accompany development proposals in Flood Zone 1 only where the site is one hectare or more, where the land has been identified by the Environment Agency as having critical drainage problems, or where the land is identified as being at risk of flooding from any source. None of those circumstances applies, the application site extending to approximately 0.19 hectares.

Surface water and foul drainage

- 6.42 Surface water would be managed sustainably. As shown on the Proposed Site Plan (LP02 P6), the driveway and parking areas would be finished in permeable surfacing to reduce run-off, and the extensive areas of amenity lawn, native wildflower grassland and soft landscaping would assist natural infiltration. The detailed surface water drainage strategy would follow the preferred drainage hierarchy, prioritising infiltration in the first instance, and can be secured by planning condition. Sustainable drainage systems would be incorporated in a manner proportionate to the nature and scale of the proposal, in accordance with policy F8 of the Framework.

e) Highway impact

- 6.43 Vehicular access to the site would be taken from the existing access onto School Lane to the north. That access was formed pursuant to planning permission DC/22/0601 (granted 12 August 2022) for a single vehicular crossover, and no alterations to it are proposed. As shown on the Proposed Site Plan (LP02 P6), the junction with the highway would be finished in block paving.

- 6.44 Off-street parking would be provided within the detached garage and on the permeable driveway, in accordance with West Sussex County Council's parking standards for a dwelling of this size. Secure cycle parking for 2no. cycles, refuse and bin storage and an electric vehicle charging point would also be provided, as shown on the Proposed Garage drawing (105 P2). This accords with policy TR4(1)(e) of the Framework, which requires a suitable number of parking spaces for a range of transport modes, reflecting the location and nature of the development and any locally-set standards, including adequate provision for the charging of electric vehicles.
- 6.45 The conversion of the building to a single dwelling would generate only a modest number of vehicle movements, comparable to those associated with any single household and well within the capacity of the local road network. There would be no unacceptable impact on highway safety, and no severe adverse impact on the transport network in terms of capacity and congestion, including cumulative impacts, for the purposes of policy TR6(4) of the Framework, which provides that development proposals should be refused where such impacts would arise.
- 6.46 The proposed development is therefore acceptable in highway terms and accords with policies TR3, TR4 and TR6 of the Framework and the relevant transport and parking policies of the HDPF.

f) Land contamination

- 6.47 The site is required to be made suitable for its proposed residential use, having regard to any risks arising from land contamination. At the national planning policy level, policy P2(1) of the Framework provides that sites proposed for development should be suitable for their proposed use, taking into account ground conditions, including any risks arising from land instability or contamination, and the extent to which any such risks can be mitigated. Policy P2(3) requires adequate site assessment information, prepared by a competent person, to be available to inform those considerations, and policy P2(4) provides that, where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.
- 6.48 The application is accompanied by a Preliminary Ground Contamination Risk Assessment (Desk Study) prepared by Ashdown Site Investigation Ltd (R17151). The assessment reviews the site's history, geology and hydrogeology and presents a

preliminary contamination risk assessment and conceptual model. The site was historically open agricultural land that subsequently formed part of a residential garden, with no significant industrial or potentially contaminative former uses identified. The site is underlain by the Lower Greensand Group, which is classified as a Principal Aquifer, but does not lie within a groundwater Source Protection Zone.

- 6.49 The assessment identifies potential sources of contamination in the form of made ground beneath former and removed structures and the soil mounds present on the site, and identifies potential pollutant linkages to the proposed end users (including via direct contact, dust, ground gas and the consumption of home-grown produce). These potential pollutant linkages are, however, assessed as being of low risk.
- 6.50 The corrugated roof sheeting to the existing building is of fibre cement and, having regard to its likely age, may contain asbestos; an asbestos survey fell outside the scope of the Desk Study. Any asbestos-containing materials identified would be removed and managed by a suitably qualified contractor in accordance with the Control of Asbestos Regulations 2012, so as to ensure that there is no risk to end users and that such materials are not introduced into the underlying soils.
- 6.51 The Desk Study recommends that an intrusive ground investigation be undertaken to enable a quantitative risk assessment. This is a matter that can properly and reasonably be secured by a standard land contamination planning condition, requiring a Phase 2 intrusive investigation and, where necessary, a remediation strategy and verification, together with provision for the reporting of any unexpected contamination encountered during the works.
- 6.52 Subject to the imposition of such a condition, there is no impediment to the site being made suitable for the proposed residential use, and the proposed development would accord with policy P2 of the Framework and the relevant contaminated land policy of the development plan.

g) Ecology and biodiversity net gain requirements

- 6.53 At the national planning policy level, policy N2(1) of the Framework requires development proposals to contribute positively to the natural environment and to support nature's recovery, including by considering the environmental qualities of the land proposed for development; conserving and enhancing existing natural features of

visual, historic or nature conservation value, such as established trees and hedgerows; using appropriate landscaping to help create a well-designed place and integrate the development into its surroundings; and incorporating features which support priority or threatened species. Policy N2(2) provides that, if significant harm to biodiversity cannot be avoided, adequately mitigated or, as a last resort, compensated for, the development should be refused.

- 6.54 Policy N2(1)(f) further requires development proposals to incorporate integrated nest boxes, commonly known as swift bricks, unless there are compelling technical reasons which prevent their use or would render them ineffective.
- 6.55 At the local planning policy level, Policy 31 of the HDPF requires development to contribute to the enhancement of existing biodiversity and, where appropriate, to create and manage new habitats, whilst Policy 25 seeks to protect, conserve and enhance the natural environment and landscape character of the District.
- 6.56 The application is accordingly accompanied by a Preliminary Ecological Appraisal and Preliminary Bat Roost Assessment prepared by CT Ecology Ltd (Ref. 26010), together with the results of an environmental DNA (eDNA) survey. The assessments establish the baseline ecological conditions of the site and ascertain whether any ecological constraints could affect the proposed works. The report has been prepared in accordance with current good-practice guidance, including British Standard 42020:2013 and the CIEEM Guidelines for Preliminary Ecological Appraisal.
- 6.57 Bats and the places they use for shelter and breeding are protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). Whilst the building is situated in an area with good connectivity to high-value bat habitats within the local landscape, the Preliminary Bat Roost Assessment found that it does not offer any optimal bat roosting features, that internal roosting opportunities are limited, and that no bats or secondary evidence of bat presence were identified during the assessment. The building is accordingly assessed as being of negligible potential to support roosting bats, such that no further emergence or activity surveys are required to inform the proposals.
- 6.58 An eDNA survey was undertaken of the pond located approximately 10m to the south of the site, being the only pond within 250m of the application site, and returned a negative result for great crested newts. On the basis of that result, the potential

presence of great crested newts within the on-site terrestrial habitats has been scoped out, and no mitigation in respect of this species is considered necessary.

- 6.59 With regard to Biodiversity Net Gain, a statutory minimum of 10% Biodiversity Net Gain would ordinarily apply under the Environment Act 2021, assessed against the site's baseline biodiversity. The Biodiversity Gain (Town and Country Planning) (Amendments and Transitional Provisions) (England) Regulations 2026 came into force on 6 August 2026 and apply to applications for planning permission made on or after that date. Those Regulations removed the previous exemption for self-build and custom housebuilding development and introduced in its place an exemption for small sites.
- 6.60 The small sites exemption applies where development is carried out on a site with an area of 0.2 hectares or less, save where on-site priority habitat would be affected. The application site, as defined by the red line boundary shown on the Location & Block Plan (LP01 P4) and the Proposed Site Plan (LP02 P6), extends to approximately 0.19 hectares and therefore falls below the 0.2 hectare threshold. The Preliminary Ecological Appraisal prepared by CT Ecology Ltd (Ref. 26010) does not identify any priority habitat within the application site.
- 6.61 The proposed development is accordingly exempt from the mandatory Biodiversity Net Gain requirement. Notwithstanding that exemption, the comprehensive soft landscaping scheme shown on the Proposed Site Plan (LP02 P6), comprising areas of amenity lawn and native wildflower grassland, specimen tree planting, single-species native hedgerow planting and feature planting areas, would deliver a tangible improvement to the biodiversity value of the site over its existing condition, consistent with policy N2(1) of the Framework and Policy 31 of the HDPF. It is noted in this regard that policy N2(3) of the Framework provides that decision-makers should not give weight to development plan policies which require biodiversity gains going beyond the statutory framework, including where a policy requires such gains for development proposals which are exempt.

7.0 Conclusion

7.1 This Planning Statement has been prepared by Wilbury Planning Ltd in support of a full planning application to Horsham District Council for the following:

- *“Proposed conversion of a disused and redundant rural building to a single dwellinghouse (Class C3), with the erection of a detached garage incorporating ancillary accommodation within the roof space to be used as a home office, the provision of a garden area and additional planting, the use of the existing vehicular access onto School Lane to the north, and the retention of access to the existing paddocks to the south.”*

7.2 The site is Batts Barn, School Lane, Ashurst, Steyning BN44 3AY.

7.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the application be determined in accordance with the development plan unless material considerations indicate otherwise. The proposal has been assessed against the development plan and all other material considerations within this Statement.

7.4 Annex A(2) of the Framework provides that development plan policies, or parts of those policies, which are materially inconsistent with the national decision-making policies should be given very limited weight. To the extent that Policies 4 and 26 of the HDPF operate to preclude development of a kind for which policies S4 and S5 of the Framework now expressly provide, they fall to be given very limited weight in the determination of this application.

7.5 The site directly abuts the secondary settlement boundary of Ashurst identified in the emerging Local Plan, is bound by existing built development and is served by an existing vehicular access onto School Lane. It is submitted that the site falls within the settlement of Ashurst for the purposes of the Framework, such that policy S4 applies and the development should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects. No such adverse effects arise, and the proposal does not fail to comply with any of the national decision-making policies which state that development proposals should be refused in specific circumstances.

7.6 In the alternative, were the site to be treated as lying outside the settlement, the proposal would fall within policy S5(1)(c), being the reuse of an existing building of

permanent and substantial construction which is lawful in planning terms and which would be neither extended nor disproportionately altered, and within policy S5(1)(e), being limited infilling within a group of houses. The proposed dwelling would not be isolated, such that policy HO11 is not engaged; were it to be, the proposal would satisfy policy HO11(1)(c), in that it would reuse a redundant and disused building and would enhance its immediate setting. The alternative of a commercial or business re-use of the building has been tested through the accompanying Viability Report and found to be neither viable nor appropriate, satisfying Policy 10 of the HDPF. The principle of development is accordingly acceptable.

- 7.7 In terms of design, the conversion would retain the existing agricultural form and scale of the building without extension, would employ a recessive palette of materials, and would be set within a comprehensive soft landscaping scheme. It would not harm the character or appearance of the building or the surrounding rural landscape, in accordance with Policies 25, 32, 33 and 34 of the HDPF and policies DP3 and N2 of the Framework.
- 7.8 For the reasons set out in this Statement, it is respectfully submitted that planning permission should be granted, subject to the imposition of appropriate planning conditions.