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For the attention of Meg Bayliss

Planning and Development
Horsham District Council
Albery House
Springfield Road
Horsham
RH12 2GB

Your reference: DC/25/1198

Emailed 13 August 2026

Dear Ms Bayliss,

Re: DC/26/0616 – 82 Bedford Road – Committee Report: Request for Correction / Deferral – 18 August 2026

I am writing following publication of the revised Planning Committee report for the above application.

I recognise that the report has been amended following the previous withdrawal from Committee. However, I remain concerned that a number of factual inaccuracies, internal inconsistencies and insufficiently evidenced conclusions remain.

I am therefore asking that these matters are reviewed before the application is determined. Where they cannot be satisfactorily resolved before the meeting, I respectfully request that consideration of the application is deferred so that Members are not being asked to determine it on the basis of a report which remains materially inaccurate or incomplete.

I have copied the Head of Development and Building Control and the Horsham District Council's (HDC) Monitoring Officer because several of the matters below concern the factual accuracy and internal consistency of the Committee report, the identification of the applicable policy framework and the evidential basis on which Members are being asked to exercise their planning judgement. I am not asking the Monitoring Officer to determine the planning merits of the application. Rather, I am asking that consideration be given to whether any material factual, legal or procedural errors in the report require correction or clarification before the application is determined.

My concerns are as follows.

1. The description of No. 82 remains inaccurate

Paragraph 1.8 describes No. 82 as a "*mid-terraced dwelling*" within a continuous row of similar properties.

This is not an accurate description of the site. No. 82 is an end-of-terrace property, with an alley separating it from No. 84, which is itself detached. The report itself acknowledges this alley at paragraph 6.12.

This is relevant because the report subsequently relies upon comparisons with properties within *"the terrace"* and describes the relationship with neighbouring properties as typical of a terraced residential environment.

The physical circumstances of an end-of-terrace property are materially different from those of a mid-terraced property, particularly when assessing the effect of a rear extension on neighbouring properties.

I therefore ask that the description of the site, and any conclusions or comparisons based upon it, are accurately described.

2. The report does not adequately distinguish the lawful planning baseline from the physical baseline

The report repeatedly refers to an *"existing four-bedroom property"*.

However, the submitted drawings entitled "Existing Floor Plans" identify Flat 1 and Flat 2 and show one kitchen, one bathroom, one WC, one bedroom, one living/reception room each and no internal connection between the two flats. The former reception rooms are labelled simply as numbered "Rooms", rather than being identified as living/reception rooms. This presentation can give the impression that the property was an existing 4-bedroom dwelling.

There is independent evidence of the actual accommodation at the time of the July 2025 sale. The contemporaneous [Savills sale particulars](#) (click for details) describe No. 82 as *"two storey end of terrace building arranged as two self-contained flats"*, each comprising one bedroom, one reception room, kitchen, bathroom and WC. Neighbours' testimonies support this and utility address records now appear to list 6 separate room addresses at 82 Bedford Road

The planning history is also important. DC/25/1366 was an approved Lawful Development Certificate – Proposed for internal works to convert 2 x 1-bedroom flats into a single 2-bedroom dwellinghouse.

I am not asking HDC to determine through this application whether the property is lawfully one dwelling or 2 flats, nor am I seeking to raise a separate enforcement matter.

My concern is that Members should be able to distinguish clearly between:

- the lawful planning baseline established by DC/25/1366,
- the physical baseline and actual accommodation shown on the submitted Existing Floor Plans and
- the 6-bedroom configuration shown on the proposed plans and now substantially implemented.

The report currently does not make these distinctions sufficiently clear.

I therefore ask that the report clearly identifies the relevant planning and physical baseline used in each part of the assessment and explains how these different circumstances have been taken into account.

3. The report is inconsistent in its treatment of the 6-bedroom configuration

This is particularly important.

Paragraph 1.6 expressly states that the submitted plans show the conversion of the two flats into a 6-bedroom HMO, while paragraph 1.8 states that the property is currently being converted from 2 flats into a small HMO comprising 6 bedrooms.

The plans show 6 bedrooms, 6 ensembles and a shared internal kitchen/dining area. Furthermore, this internal configuration has now been substantially implemented, rather than merely being a hypothetical future layout.

Yet elsewhere the report repeatedly describes HMO occupation as something the layout "*could facilitate*" and paragraph 6.14 treats intensity of use and internal layout largely as matters outside the planning assessment.

I fully appreciate that DC/26/0616 is an application for an extension and not an application for a change of use.

However, that does not answer the separate planning question of what effect the proposed additional bedroom has on the development as a whole.

The report should therefore provide a clear and consistent account of:

- what accommodation physically exists
- what accommodation is shown on the submitted plans
- what has already been substantially implemented
- what the proposed extension adds
- how the additional bedroom has been taken into account when assessing the resulting intensity and standard of accommodation.

4. The standard and functionality of the accommodation has not been adequately assessed

This is, in my view, a particularly important omission.

The proposed rear extension is specifically intended to provide an additional bedroom with ensuite. The resulting 6-bedroom arrangement provides a shared internal kitchen/dining area as the principal communal space.

There is therefore a fundamental planning question which the report does not appear to address adequately i.e.

Does adding another bedroom, without any corresponding increase in communal accommodation, result in an acceptable standard and functionality of accommodation for the people who will occupy the resulting development?

The concern is particularly acute because the shared kitchen/dining area is a completely internal communal space, with no corresponding increase in communal accommodation resulting from the 6th bedroom. The proposal therefore increases the number of bedrooms and potential occupants without increasing the principal shared living/dining provision.

The issue is not simply whether 5 or 6 people could lawfully occupy the property without a separate planning application for a change of use.

The planning application proposes an additional bedroom as part of a particular physical development and the acceptability of that additional built form should be assessed in the context of the accommodation it is intended to provide.

Paragraph 6.14 does not appear to engage with this question sufficiently, instead referring to HMO standards, internal layout and intensity as matters controlled by other legislation or as matters not directly related to the extension.

I therefore ask that the report explains how the effect of the additional bedroom on the adequacy, functionality and standard of the accommodation as a whole has actually been assessed under the scope of planning considerations.

5. The conclusion that the proposal does not constitute overdevelopment is not adequately evidenced

Paragraph 6.6 states:

"The remaining garden space is comparable to other properties within the terrace."

However, no measurements, comparator properties, garden-area calculations or other evidence are provided to support this conclusion.

Similarly, paragraph 6.8 states that there are *"numerous examples of similar rear extensions along Bedford Road"* but does not identify those properties or explain how their circumstances compare with No. 82.

This is particularly important given that:

- No. 82 is incorrectly described as mid-terraced
- the proposed development forms part of a 6-bedroom accommodation arrangement
- the site has already been extended
- the proposal further reduces the available garden.

If comparisons with other properties are relied upon to justify the conclusion that the proposal is not overdevelopment, Members should be told which properties are being compared and why they are genuinely comparable.

I therefore ask that the evidential basis for this conclusion is clarified or supplemented so that Members can properly understand the basis upon which the conclusion has been reached.

6. The dimensions of the proposed extension require clarification

The report repeatedly describes the proposed extension as approximately 3m deep. It also acknowledges that the existing lean-to extension being removed is approximately 2.21m deep.

Meanwhile, the application form identifies an overall projection of approximately 5.1m from the original rear wall.

The report does not clearly explain the point from which its 3m measurement is taken or how the 3m and 5.1m dimensions relate to one another.

The report also describes the development as *"modest"* but provides no evidence for this conclusion.

This matters when assessing:

- scale and massing
- remaining garden
- neighbouring amenity

- cumulative built form
- whether the resulting development represents overdevelopment.

I therefore ask that the report clearly identifies the measurement baseline, reasons for describing the development as modest and ensures that Members understand the actual resulting projection from the original rear wall, rather than simply being presented with a 3m figure.

7. The cumulative built form and physical baseline require clearer assessment

I understand that the smaller side/rear extension is no longer part of DC/26/0616 and that the Committee is not being asked to determine its planning status under this application.

However, it has been built and physically forms part of the site.

The question is therefore not whether the Committee should grant permission for that smaller extension, but whether the proposed additional extension has been assessed in the physical context in which it now sits and is still deemed to be “modest” when fully considered.

This is relevant to matters including:

- remaining garden
- site coverage
- cumulative built form
- scale and massing
- the relationship with neighbouring properties.

I therefore ask that the report makes clear what physical baseline has been used in reaching its conclusions on these matters, rather than leaving Members to infer this from the drawings.

8. Paragraph 6.16 contains an apparently incorrect Southwater Neighbourhood Plan reference

Paragraph 6.16 refers to “*Policy SNP14 of the Southwater Neighbourhood Plan*” concerning the loss of garages and replacement parking.

The application is at 82 Bedford Road, Horsham, not Southwater. Furthermore, there is no issue in this application concerning the loss of a garage or an existing parking space of the kind described in this paragraph.

This appears to require correction.

More importantly, given the number of other factual inconsistencies identified above, I would be grateful if HDC could confirm whether this is simply an erroneous policy reference or whether wording from another application has inadvertently been incorporated into the report.

9. Southern Water's requested planning condition is not reflected in the recommendation

Paragraph 3.3 records that Southern Water requested a planning condition requiring the developer to agree measures to protect public sewers before commencement of development.

However, this requested condition does not appear among the recommended conditions.

Instead, the report contains only an informative concerning the possible presence of a public sewer.

I would therefore ask HDC to explain why Southern Water's requested condition has not been included among the recommended conditions and whether the current position regarding the public sewer on site and Southern Water's concerns has been satisfactorily resolved.

10. The water-neutrality conclusion appears inconsistent with the report's own findings

Paragraph 6.22 concludes that there is no clear or compelling evidence that the proposal would result in more intensive occupation requiring increased water consumption.

However, elsewhere the report expressly states that the property is being converted into a 6-bedroom HMO and that the proposed extension creates an additional bedroom with an ensuite.

Given that the additional bedroom is the very purpose of the extension, I would ask HDC to explain the evidential basis for concluding that the development would not result in more intensive occupation and, specifically, how the 6-bedroom configuration and additional ensuite have been taken into account when comparing with 2 flats with one bathroom each.

11. The Horsham Society's objection

I understand that the Horsham Society submitted an objection to the application.

I cannot see this separately identified in the consultation section of the report.

I would therefore be grateful if HDC could confirm that this representation has been fully considered and ensure that Members are made aware.

Conclusion

I recognise that a number of the matters raised above ultimately involve planning judgement and I fully accept that the weight to be given to material planning considerations is for Members to determine.

My concern is more fundamental:

Members can only exercise that judgement properly if the factual and policy premises on which they are being asked to rely are accurate, consistent and sufficiently evidenced.

In particular, Members need to have a clear understanding of:

- the lawful planning baseline, the physical baseline and the actual state of the development at the time of determination
- the 6-bedroom accommodation configuration shown on the submitted plans and now substantially implemented
- the fact that the proposed extension creates the additional bedroom within that 6-bedroom configuration
- whether the resulting accommodation provides an acceptable standard and level of communal amenity under planning considerations
- the cumulative built form and remaining garden
- the actual relationship of No. 82 to its neighbouring properties
- the evidence supporting the conclusion that the development does not constitute overdevelopment
- the correct local policy framework applicable to this site
- the basis for the water-neutrality conclusion
- the status of Southern Water's representation and requested condition.

I am **not** asking HDC to determine through this application any separate enforcement question or to decide whether the existing HMO use requires planning permission. My concern is whether the

Committee report accurately describes the factual circumstances and provides Members with a sufficiently robust assessment of the planning application actually before them.

I therefore respectfully request that these matters are reviewed and that the report is corrected or supplemented where necessary before the application is determined.

If the material issues identified above cannot be satisfactorily resolved before the 18 August meeting, I respectfully request that consideration of the application is deferred, rather than Members being asked to determine it on the basis of a report which remains factually or analytically incomplete.

Given the proximity of the meeting, I would be grateful if HDC could confirm whether these matters have been reviewed and whether any corrections or additions to the report will be made before the Committee considers the application.

My intention is simply to ensure that Members are provided with an accurate, consistent and sufficiently comprehensive account of the application and its planning context, enabling them to reach a properly informed decision.

Yours sincerely,



cc

Emma Parkes – Head of Development and Building Control

Lauren Kelly – Head of Legal and Democratic Services / Monitoring Officer

Committee Services

Forest Councillors:

Councillor Jon Olson

Councillor David Skipp

Councillor Colin Minto