**SLR Consulting Limited**

11 November 2026

Sam Whitehouse
Horsham District Council
Planning Department

SLR Project No.: 433.000123.00001

Council Reference No.: DC/25/2087

Dear Sam

## RE: DC/25/2087 - Thakeham Tiles, Storrington

---

Further to our last submission pack sent to you on 18 June 2026 and our subsequent conversations; the applicant has sought to proactively address the final outstanding matters raised by consultees, namely, comments from the Council's Landscape and Arboricultural Officers regarding site levels and impact on existing and proposed vegetation.

The below presents our responses to the final outstanding matters, in the hope that the Council will now be in a position to recommend approval of the Outline proposal for up to 108 homes at Thakeham Tiles.

### Site Levels and Impact on Trees

We acknowledge the concerns raised by the Council's Landscape Architect in their holding objection (dated 21/7/26), and by the Council's Arboricultural Officer (dated 09/7/26). Whilst we acknowledge that the re-development of the site will result in changes to the existing landscaped surrounds of the site, these changes are required to facilitate the proposed number of units in order to make the best use of the land allocated in the Thakeham Neighbourhood Plan. As you know, to make best use of land is in accordance with national decision-making policies L2 and L3 of the NPPF which directs that substantial weight should be afforded to sites that make '*effective use of previously developed land*' (L2, 1, c) and proposals that make the '*best use of a site's development potential*' (L3, 2, b).

As we understand it, the most pertinent matter raised by both consultees relates to the impact of the proposed development on existing woodland, trees and other vegetation within the site and around its boundaries, including the impact on root protection areas (RPAs) of trees to be retained.

In response, we have instructed specialist consultants to undertake detailed levels assessments of the site to provide the Council with a better understanding of the existing level

changes, and how the boundary vegetation will be safeguarded. The following levels plans have been submitted for the Council's review:

| New Plan | Reference |
|---|---|
| Indicative Proposed Site Levels Plan | TTSTORRINGTON.23/01 Rev P8 |
| Comparison of Proposed Levels with Existing Levels | TTSTORRINGTON.23/02 Rev P3 |
| Indicative Cut and Fill Plan | TTSTORRINGTON.23/03 Rev P4 |

The submitted indicative levels plan (ref: TTSTORRINGTON.23/01 Rev P8) shows how level changes across the site would be managed to ensure that the proposed development can be accommodated within the site without impacting existing vegetation which is shown for retention. Owing to the varying level changes across the site, the submitted plan indicates the existing embankments and retaining wall structures which are long-established and will ensure RPAs can be protected to safeguard existing trees within the site boundaries. Additional retaining walls of varying heights are likely to be required in locations within the site, and the indicative location and scale of these are indicated within the submitted plan. Whilst some of the retaining features shown have heights of up to 3.5m, these are unlikely to result in unacceptable visual problems due to the presence of existing and enhanced vegetation. At detailed design stage, the location of these structures will be carefully considered to ensure they are located outside of tree protection areas and therefore would not encroach into the RPAs of any existing trees.

The submitted plan also indicates indicative finished floor levels as requested.

It should be noted that the layout of the site as shown within the submitted levels plan is purely indicative and simply shows one way in which the site could be developed. Whilst the indicative levels plan identifies some locations where retaining structures are in close proximity to gardens or internal roads, these matters can be refined through the Reserved Matters process to ensure that the eventual layout of the site accords with level changes and any required retaining structures.

Also submitted is a cut and fill plan (ref: TTSTORRINGTON.23/03 Rev P4) which shows the indicative locations within the site where existing ground levels would need to be altered. Importantly, this plan shows that all ground levels within the tree protection zones would remain as existing, providing comfort to the Council that the development can be delivered without compromising tree health, stability or long-term retention. The Land Use Parameter Plan has also been amended (ref: THAK230417_LUPP-01_F) to reflect the cut and fill plan to ensure that the 'Developable Areas' (indicated in orange) fall outside of any tree RPAs. It is our understanding that this plan would be an approved plan by which the Reserved Matters proposals must comply to; thereby giving the Council assurance that no development can encroach into tree RPAs at detailed design stage.

Finally, an updated Arboricultural Implications Assessment (v3E) has been submitted which acknowledges that site levels are a key Arboricultural consideration but concludes that the indicative site level information submitted is sufficient to demonstrate that the development is achievable without unacceptable impacts on retained trees and RPAs subject to appropriate tree protection, mitigation measures and detailed design at Reserved Matters stage.

Landscape Character and PROW

In liaison with you, we have sought to proactively address the concerns raised by the Landscape Architect regarding the landscape character of the site particularly around Public Right of Way (PROW 2625) and the woodland character along the north-western boundary. It should be noted that despite the classifications indicated by MAGIC maps, none of the woodland within the application site is deemed to be Priority Habitat as deduced from field studies undertaken by our appointed ecologists and presented in the BNG Assessment.

In response to the outstanding landscape matters, the Illustrative Masterplan and accompanying Parameter Plans have been amended to include a new landscape strip to the north of the PROW which would have a width of a least 3m to accommodate a line of tree planting to enhance the character of this route.

In addition, the tree buffer along the northern boundary (north of indicative plots 99-106) has been widened, with the development parcel in this area subsequently reduced to ensure existing trees along Rock Road would not be located within private curtilages thereby guaranteeing the retention of these trees.

Alongside the revised Parameter Plans, a revised Landscape Masterplan (Rev 06) has been submitted, as well as an updated Landscape Design Strategy (Rev 05) which includes a section drawing showing (indicatively) how the PROW route and retaining wall features are anticipated to be designed.

All amendments have been included in the enclosed plan pack, with revised plan references summarised in the table below:

| Amended Plan | New Reference | Superseded |
|---|---|---|
| Illustrative Masterplan | THAK230417 IMP-04 **E** | THAK230417 IMP-04 D |
| Indicative Site Sections | THAK230417 ISS-01 **C** | THAK230417 ISS-01 B |
| Access and Movement Parameter Plan | THAK230417_AMPP-01_**E** | THAK230417_AMPP-01_D |
| Density Parameter Plan | THAK230417_DPP-01_ **E** | THAK230417_DPP-01_ D |
| Land Use Parameter Plan | THAK230417_LUPP-01_**F** | THAK230417_LUPP-01_D |
| Storey Heights Parameter Plan | THAK230417_SHPP-01_**E** | THAK230417_SHPP-01_D |
| Landscape Masterplan | LLD3475-LAN-DWG-010-**06** | LLD3475-LAN-DWG-010-04 |
| Landscape Design Strategy | LLD3475-LAN-REP-010-**05** | LLD3475-LAN-REP-010-04 |
| Arboricultural Implications Assessment | CBA10637 **v3E** | CBA10637 v3B |

We trust that these changes are acceptable to address the key landscape character matters, and we would anticipate that a planning condition would be imposed to require the detailed design of the site at Reserved Matters stage to accord with the details shown in the Parameter Plans.

Noise

Whilst the latest comments from the Council EHO (dated 13/8/26) raise a number of concerns with regard to predicted noise levels in gardens and facades of the plots adjacent to Rock Road, the Council is reminded that the layout shown is indicative and is not necessarily how the site will come forward at Reserved Matters stage. When the detailed design of the site is underway, the layout of dwellings along the site frontage will be reviewed to ensure the outdoor spaces are within the acceptable noise parameters, and the units are orientated in accordance with best practice and good acoustic design. In addition, noise mitigation measures including acoustic fencing and acoustic glazing/mechanical ventilation could be included if required to ensure the noise environment of these units is within acceptable levels.

Viability

It is understood from comments dated 3/7/26 that the Council's independent viability assessors (Bespoke Property Consultants) disagree with the benchmark land value adopted and consider that more than 10% affordable housing could be delivered.

The applicant responded to BCP's latest comments in a letter dated 27/7/26, to ask for more evidence to demonstrate how they reached the values they adopted (which differ from the values the applicant has adopted), however no further evidence has been provided to date and consequently there remains a difference in position regarding the appropriate assumptions.

As per the previously permitted application at Thakeham Tiles (DC/18/2095) whereby the Council agreed to a less-than policy compliant number of affordable housing units (at 20%), we consider it to be for the Council to consider the outcomes of the viability assessment and balance the proposed affordable housing offer (of 11x shared ownership units) in light of the acknowledged unique viability constraints facing the site. In addition, the aspiration of the site owners to re-locate the family-run business to a more suitable and viable premises results in a unique situation which directly affects the overall viability of the project, and therefore the ability to offer a fully policy compliant level of affordable housing.

The site owners acknowledge that the affordable housing offer is not fully compliant with the Council's adopted policy requirements of 35% (HDPF, Policy 16), but the viability assessment submitted demonstrates the costs associated with the project are significant, and the offer of 11no. affordable units (alongside a mix of 97 general market units) still provides a significant public benefit in the planning balance.

It is also of note that the emerging affordable housing policy (Strategic Policy 39: Affordable Housing) of the Horsham District Local Plan now carries significant weight given the advanced stage in plan making and the Inspector's recent indication that the plan will be found sound subject to minor modifications. Strategic Policy 39 requires sites on previously developed (brownfield) land to provide a minimum of 10% affordable housing. As such, whilst we acknowledge that all 11 of the proposed affordable housing units will be of a single tenure (shared ownership); the overall number of affordable units proposed (10%) is policy compliant against the requirements of emerging Strategic Policy 39.

The viability of the project is predicated on the applicant's desire to re-locate and retain the manufacturing business of Thakeham Tiles which is a significant benefit that we understand the Council to be in support of in order to secure local jobs and continued enterprise within the district.

As you are aware, the draft s106 agreement secures the provision of affordable housing, and a clause is included to ensure that a policy compliant level of affordable housing and tenure split (of 70% affordable rent, and 30% shared ownership) would be secured in the event that the Thakeham Tiles business does not re-locate. A similar fallback was accepted for the previously approved application and provides the Council with the comfort that a fully policy compliant tenure split of affordable housing will be delivered if the business does not re-locate as planned.

As such, we call for the Council to accept the conclusions of the submitted viability assessment to allow the provision of 10% affordable (11x shared ownership) units in order to enable the business to fulfil its aspiration to re-locate and secure the viability of this local business into the future.

S106 Agreement

I understand that the drafting of the s106 agreement is underway and has been shared with WSCC for comment. I would be grateful for an update on the status of the agreement, and I would be happy to discuss any outstanding matters as necessary so it can be progressed to final completion. Given the significant weight now attributed to Strategic Policy 39 of the Horsham District Local Plan (which requires 10% affordable housing provision on brownfield sites), we would welcome an amendment to Schedule 2 of the draft agreement to remove reference to the clause at 2.3 which requires an uplift of affordable provision (in the event that the business does not relocate). I would be grateful if you can instruct your legal team on this basis.

Summary

Thank you for allowing us time to make the enclosed amendments, and I trust that you will be able to re-consult as necessary. I would be happy to arrange a follow-up call with you when the time is right to run through any further matters ahead of moving towards a formal decision. As you know, in light of the Town and Country Planning (Discharge of Local Planning Authority Functions) (England) Regulations 2026, our view is that this application could appropriately be determined under delegated powers as it does not raise any significant planning matters, nor does it raise an economic, social or environmental issue of significance to the local area. As such, in line with the Regulations, we believe that the application should be delegated to Officers for a decision.

Kind regards,



**Angela Moore MRTPI**
Associate Planner

**SLR Consulting Limited**