

29 September 2026

Horsham District Council (Planning)  
Albery House  
Springfield Road  
Horsham  
RH12 2GB

RH/Let/P2176ii

Dear Sir / Madam,

**Resubmission Application for Full Planning Permission for the “Demolition of Existing Storage Unit and erection of 2no. detached dwellings, associated private gardens, parking and landscaping” at Land adjoining No. 2 and No. 3 Townhouse Cottages, Townhouse Farm, Coolham Road, Thakeham, RH20 3EW.**

## Introduction

We write on behalf of **Fowlers Land and New Homes** in support of the resubmission of the above planning application at land adjoining No. 2 and No. 3 Townhouse Cottages, Townhouse Farm, Coolham Road, Thakeham.

This resubmission follows the refusal of planning application DC/25/1909 and the subsequent dismissal of appeal Ref: 6007707, dated 7 July 2026. This resubmission has been submitted to the Council via the Planning Portal under reference **PP-15258002**.

The proposal remains for the demolition of the existing storage unit and the erection of 2no. detached dwellings, with associated private gardens, parking and landscaping. The plans remain entirely as per the previous application and appeal. The purpose of this resubmission is to invite the Council to determine the application in light of a significant material change in national planning policy since the appeal decision was issued.

Most notably, the newly adopted National Planning Policy Framework (NPPF) now includes **S5: Principle of development outside settlements**, which provides a clear and direct policy basis for granting planning permission for certain forms of development outside settlements.

Of particular relevance is **criterion (e) of S5**, which states that the following should be approved outside settlements:

*“Limited infilling within groups of houses”*

The policy goes on to confirm that proposals falling within the listed categories *“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 this Framework.”*

This is a significant and decisive change in the policy context. The appeal decision at Ref. 6007707 was reached before this policy was adopted and therefore could not have had regard to it. At the time of the appeal decision, the proposal was assessed primarily against the Horsham District Planning Framework (HDPF) spatial strategy and the earlier version of the NPPF. While the Inspector concluded that the site was outside the Built-Up Area Boundary and expressed concern regarding accessibility to services and facilities, the decision pre-dated the introduction of the NPPF's express support for limited infilling within groups of houses, and development addressing unmet need where physically well-related to an existing settlement.

The new national policy is therefore a material consideration of substantial weight, and in our view fundamentally alters the planning balance in this case. The proposal now benefits from a clear presumption in favour of approval under S5 because:

- the site lies within a group of houses;
- the proposal constitutes limited infilling; and
- there are no adverse effects that would substantially outweigh the benefits of the scheme.

In addition to the above, it should be noted that the District's five-year housing land supply is currently calculated as being 1.7 years which is a significant undersupply. The provision of two additional new homes in a location supported by the Government cannot therefore be ignored.

This Planning Letter seeks to provide the Planning Statement Addendum to the previously prepared Planning, Energy and Sustainability Statement which is attached at Appendix A. The previously prepared Statement of Case is also attached at Appendix B and the Inspector's Appeal Decision for Ref. 6007707 is attached at Appendix C.

## The Site as a Group of Houses and the Proposal as Limited Infilling

The appeal site lies within the established cluster known as Townhouse Farm, and is enclosed by existing residential development to the north, south and west, with established built form and domestic curtilages giving the site a clear relationship with the existing group. This is evident in Figure 1, the Location Plan.



Figure 1 - Location Plan

The appeal Inspector accepted that:

- the development would not represent urban sprawl or encroachment into the wider open countryside; and
- the site is located between existing built form.

Those findings are highly material to the present resubmission.

In visual and spatial terms, the site reads as a contained gap within an established group of houses, rather than as an isolated or sporadic incursion into open countryside. The proposed two dwellings would therefore amount to limited infilling within a group of houses in the ordinary planning sense, and now squarely fall within S5(e) of the adopted NPPF.

This is precisely the type of development the revised national policy is intended to support.

## Accessibility and Sustainability

We acknowledge that the appeal decision identified concerns regarding the attractiveness of walking routes and the likelihood of future occupiers relying on private vehicles for some journeys. However, several points remain important.

First, the Inspector did not find the site to be unsafe, isolated, or incapable of access by non-car modes. Rather, the concern was one of relative attractiveness and convenience. We remain of the view that the site benefits from established footpaths from the site to the existing services and facilities in Thakeham, and that these are of good quality by reason of comprising tarmac which is suitable for prams, wheelchairs etc.

It should further be noted that the proposals to the south of the site, at Thakeham Mushrooms which has a live application in under reference DC/26/0266, seek to significantly upgrade the footpath and landscaping to comprise of a very attractive route into Thakeham. The footpath is proposed to comprise of 'self-binding gravel footpath' as per the Indicative Landscaping Plan which would remain suitable for prams, wheelchairs etc.

Therefore, whilst we remain of the view that the current footpath to the local services and facilities is acceptable, the upgrading of the footpath as proposed under DC/26/0266 offers a further enhancement.

In addition to the above, the site remains:

- approximately 200m from Thakeham;
- served by nearby public rights of way;
- within reach of bus stops providing connections to nearby settlements including Horsham and Storrington; and
- physically related to an existing cluster of residential development.

Secondly, the site is in a rural location, and the new NPPF expressly recognises that certain forms of development outside settlements are acceptable in principle. The introduction of S5 demonstrates that national policy no longer treats all housing outside settlement boundaries in the same way, and now positively supports limited infilling within groups of houses.

Thirdly, the proposal must be considered proportionately. This is a scheme for only 2 dwellings, on a site that is physically contained and adjoins existing homes. It does not involve major expansion, isolated development, or car-dependent suburban sprawl. It is a modest infill proposal in a rural cluster, of the kind now expressly supported by national policy.

In that context, the degree of accessibility concern previously identified should not be treated as sufficient to displace the new presumption in favour of such infill development, particularly where the site is demonstrably related to existing built form and where no highway safety objection arises.

## Other Planning Considerations

It remains the case that the proposal is acceptable in all other respects.

As set out in the original application (Appendix A) and appeal documentation (Appendix B), and as reflected in the appeal decision (Appendix C), the scheme gives rise to no unacceptable technical harm in respect of:

- design and appearance;
- neighbouring residential amenity;
- highway safety and parking;
- drainage and flood risk;
- ecology and biodiversity;
- arboriculture; and
- landscape or heritage impact.

The appeal Inspector expressly recognised that:

- the proposal would provide two high-quality family-sized homes;
- the design would be acceptable and would assimilate with the local character;
- the development would amount to infill between existing development;
- the scheme was acceptable in technical terms, including highways, ecology and drainage; and
- the site is not subject to landscape, heritage or ecological designations that would preclude development.

These conclusions remain highly material and supportive of the present resubmission.

## Planning Balance under the new NPPF

Under the newly adopted NPPF, the correct starting point is that limited infilling within groups of houses should be approved, unless the benefits are substantially outweighed by adverse effects. In this case, the benefits include:

- the delivery of 2 additional dwellings in a district with a significant housing land supply shortfall;
- the redevelopment and visual enhancement of an underused site containing a poor-quality storage structure;
- a modest and logical form of growth within an existing built cluster;
- biodiversity and landscaping enhancements; and
- economic benefits through construction activity.

Against this, there is no identified technical harm, no encroachment into open countryside, no unacceptable landscape harm, no highway safety harm, and no unacceptable amenity impact.

Even if some residual concern remains regarding the convenience of non-car travel choices, that concern does not, in our respectful view, amount to an adverse effect of such magnitude that it could substantially outweigh the clear policy support and benefits of the proposal, particularly now that the Framework expressly supports limited infilling within groups of houses outside settlements.

## Conclusion

This resubmission is advanced on the basis of a clear and significant material change in national planning policy since the dismissal of appeal Ref. 6007707.

The newly adopted NPPF now expressly supports limited infilling within groups of houses under S5(e), and confirms that such proposals should be approved unless adverse effects substantially outweigh the benefits.

The application site forms part of an established group of houses at Townhouse Farm, and the proposal represents a modest and well-contained infill scheme between existing residential development. It causes no unacceptable technical harm and delivers clear social, environmental and economic benefits.

In these circumstances, there is now a clear presumption in favour of the proposed infilling development, and we respectfully request that Horsham District Council grants planning permission. The proposed dwellings would further contribute towards the District's significant housing need which is currently calculated as being 1.7 years.

If you have any further queries or require further information, please contact me on 01903 248777.

Yours sincerely  
ECE Planning



**Chris Barker MATP MRTPI**  
Managing Director

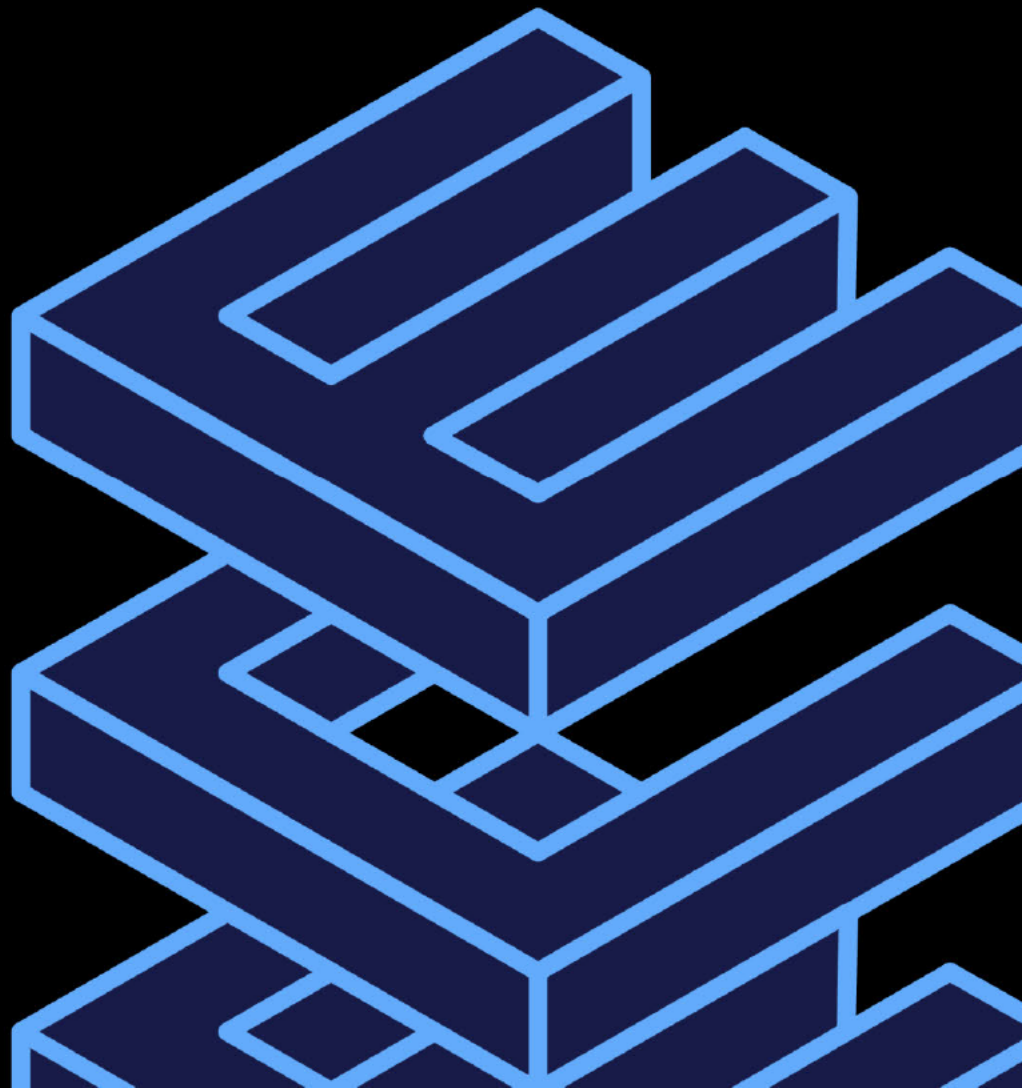
Encs.

# Appendix A - Planning, Energy and Sustainability Statement dated November 2025

# Planning, Energy and Sustainability Statement

Land adjoining No. 2 and No. 3  
Townhouse Cottages, Thakeham

November 2025



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Project Name: Townhouse, Thakeham

Location Land adjoining No. 2 and No. 3 Townhouse Cottages,  
Townhouse Farm, Coolham Road, Thakeham, RH20  
3EW

Client: Fowlers Land and New Homes

File Reference: P2176

| Issue | Date       | Author   | Checked  | Notes                |
|-------|------------|----------|----------|----------------------|
| PL1   | 07.08.2025 | D Hearle | R Hoad   | Initial Draft        |
| PL2   | 12.11.2025 | R Hoad   | C Barker | Client Issue         |
| PL3   | 20.11.2025 | R Hoad   | C Barker | Amended Client Issue |
| PL4   | 20.11.2025 | R Hoad   | C Barker | Planning Issue       |
|       |            |          |          |                      |
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## 1. Introduction

- 1.1. This Planning Statement including Energy and Sustainability Statement has been produced by ECE Planning on behalf of our client, **Fowlers Land and New Homes** in support of a Planning Application for development at Land adjoining No. 2 and No. 3 Townhouse Cottages, Coolham Road, Thakeham ('the Site'). The description of the proposal reads:

*"Demolition of Existing Storage Unit and erection of 2no. detached dwellings, associated private gardens, parking and landscaping."*

- 1.2. This application follows pre-application discussions with Horsham District Council (HDC) under reference PE/24/0227 for the *"Demolition of Existing Storage Unit and erection of 3no. dwellings (1no. detached and 2no. semi-detached dwellings), associated private gardens, parking and landscaping."* Following feedback received from HDC, the quantum of development has been reduced from 3no. dwellings to 2no. dwellings. This is discussed in further detail later in this Statement.
- 1.3. Additionally, this Statement sets out the relevant background for the determination of the planning application, including a description of the site and its surroundings, the planning history, the relevant planning policy, details of the proposed development and an assessment of relevant planning conditions.
- 1.4. The proposals have also been informed by the National Planning Policy Framework, the Planning Practice Guidance, and local planning policy.
- 1.5. This application for Full Planning Permission is accompanied by the following supporting documents:
- **Application Forms, Notices and CIL Forms**
  - **Planning Statement including Energy and Sustainability Statement**
  - **Architectural Drawings comprising Location plan, block plan, existing and proposed elevations, proposed floor plans/roof plans**
  - **Design & Access Statement**
  - **Topographical Survey**
  - **Arboricultural Statement / Tree Survey**
  - **Ecological Appraisal, BNG Metric and Biodiversity Gain Statement**
  - **Surface Water Drainage Statement**

## 2. The Site

- 2.1. The site is located to the west of Duke's Hill (the B2139) in Thakeham, as illustrated in Figure 1. The total calculated area of the site (not including access road) is approximately 0.04ha.

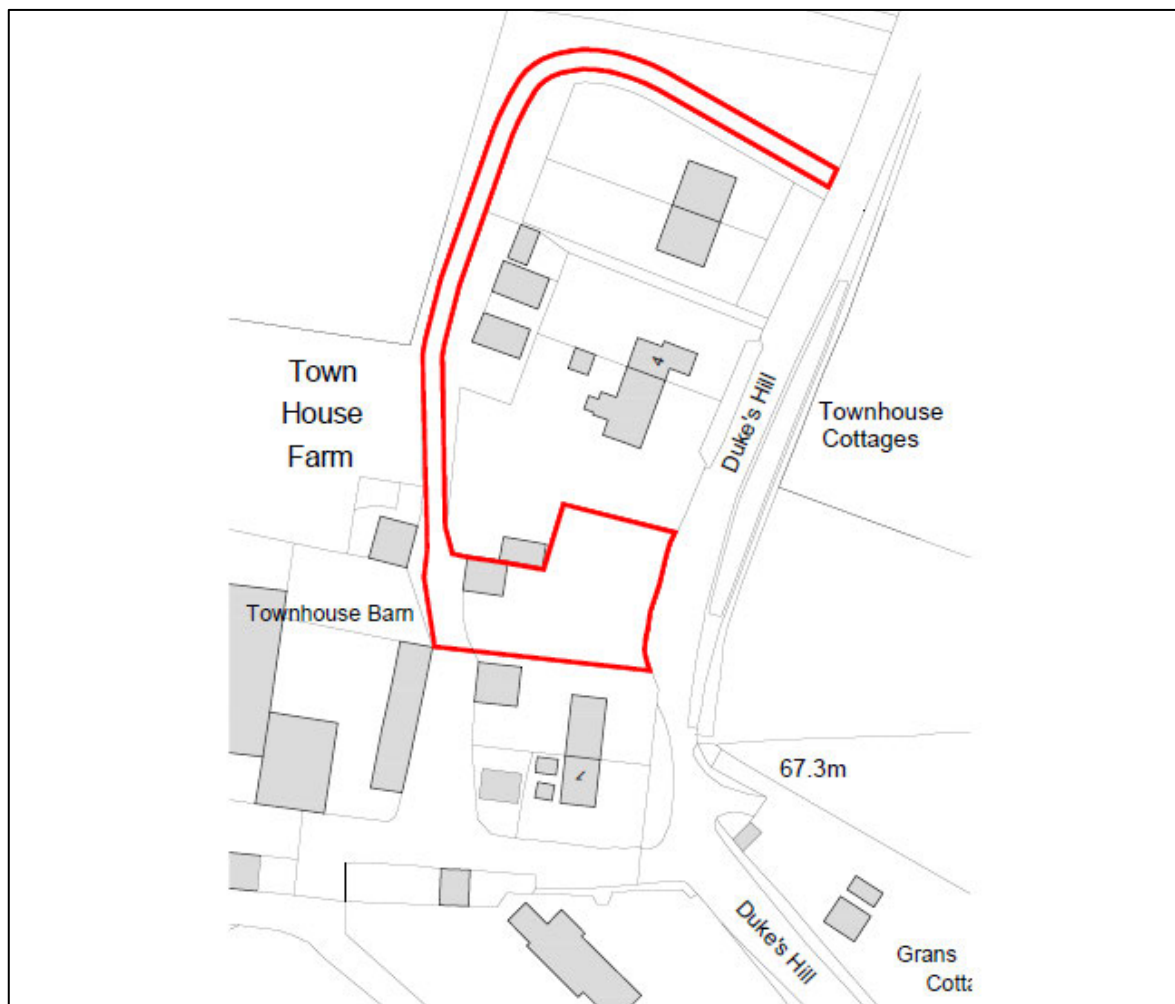


Figure 1 - Location Plan (Source: Nimbus Maps)

- 2.2. The land is privately owned by the Applicant and co-owners, and the rear section is currently licensed to a neighbouring dwelling (No. 2 Townhouse Cottages) for use as additional residential garden. The eastern boundary of the land benefits from an established boundary which is well screened from Duke's Hill. The land can be accessed via Duke's Hill and an existing established road which already serves a number of residential properties in Townhouse Farm.
- 2.3. The front (west) section of the site is occupied by a container unit which stores agricultural equipment in association with the wider land at Townhouse Farm. Refer to Figure 2 for photograph of storage unit.



Figure 2 - Image of Storage Unit (Source: Google Maps, 2024)

- 2.4. Horsham District Council's Local Plan Mapping has been reviewed and reveals that the site is not directly constrained by any heritage or landscape designations including Tree Preservation Orders (TPOs).
- 2.5. It is noted that an Archaeological Site is situated approximately 115m to the south of the site but does not directly affect the land. Refer to the below Figure.

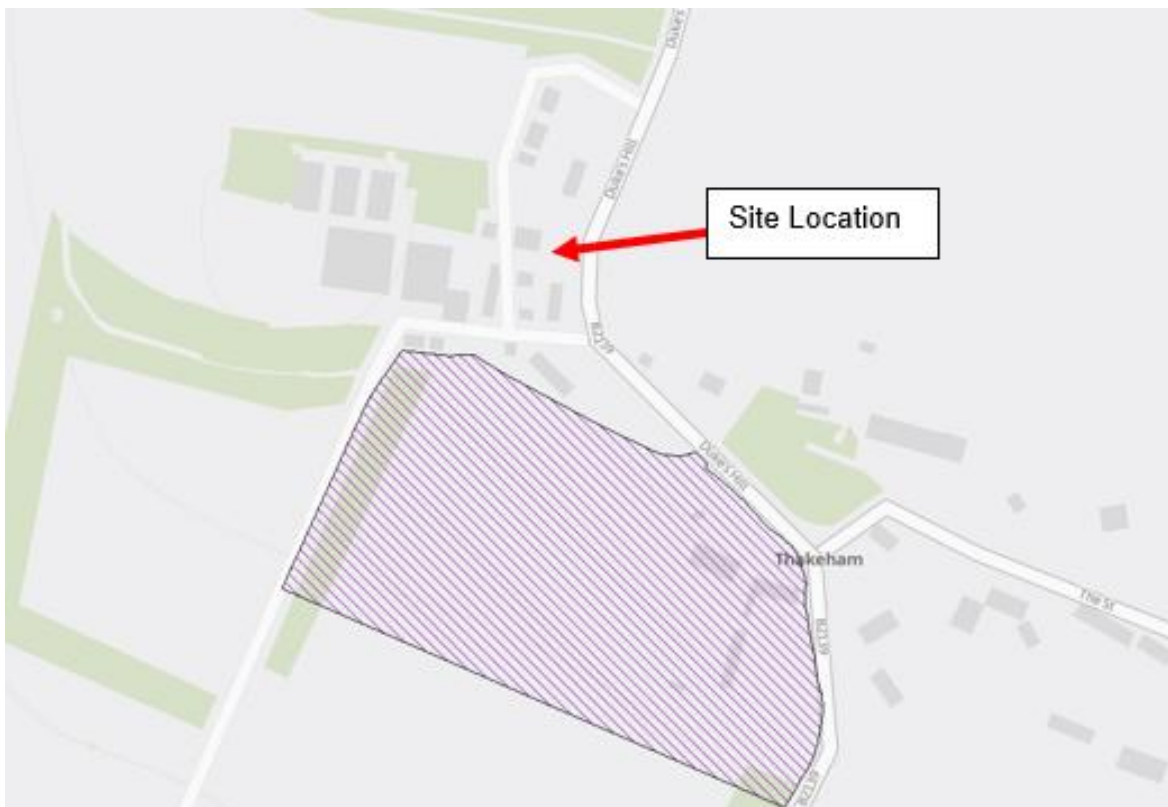


Figure 3 - Proximity to Archaeological Site

- 2.6. The site is otherwise not occupied by a Listed Building or within a Conservation Area. The closest Conservation Area is situated to the east of the site as illustrated in the below Figure. The closest Listed Building is situated circa 215m away to the east of the site at 'The Old Rectory' and 'Mansion House' as indicated below (1285062) (1027213).

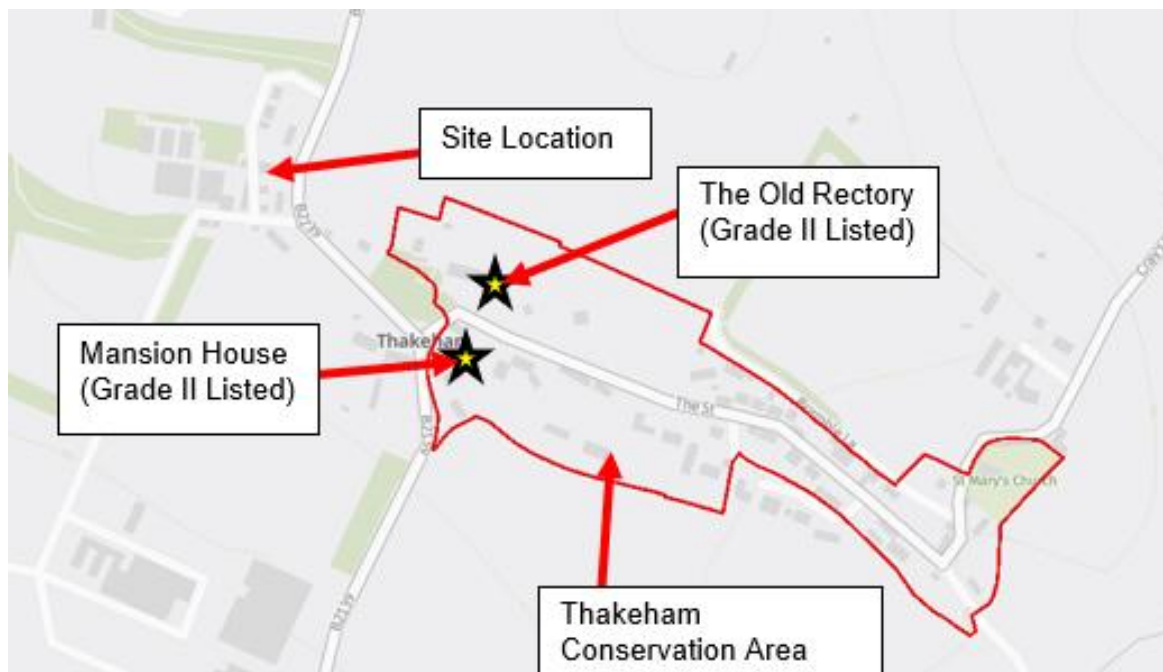


Figure 4 - Thakeham Conservation Area and Nearby Listed Buildings

- 2.7. The site is situated approximately 200m from the Built-Up Area Boundary of Thakeham as demonstrated in the below snippet.

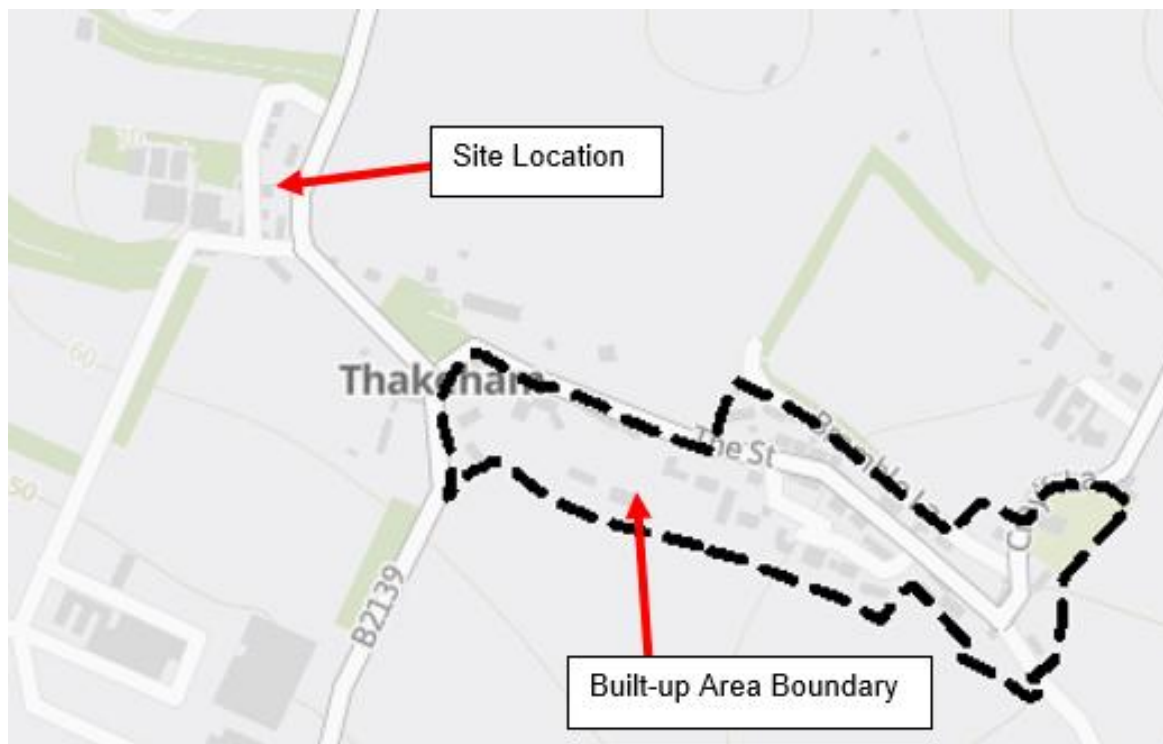


Figure 5 - Proximity to Thakeham Built-Up Area Boundary

- 2.8. It should be noted that the withdrawn Regulation 19 Local Plan sought to significantly amend Thakeham's built area as indicated below. For reference, the yellow area to the south is a Neighbourhood Plan allocation known as 'Off Storrington Rd Mushroom Site'. This is explored in further detail in the Planning History section of this Letter.

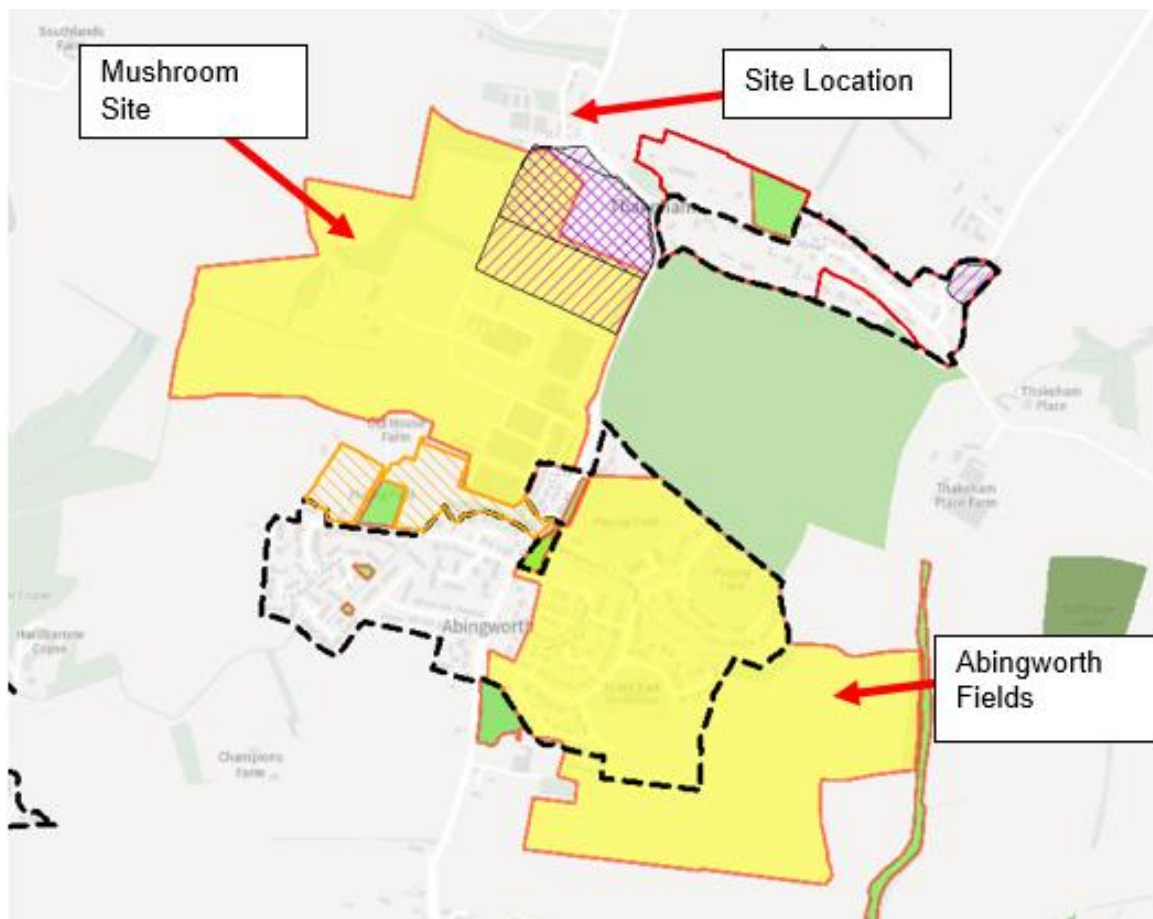


Figure 6 - Withdrawn Regulation 19 Local Plan Built-Up Area of Thakeham

- 2.9. As illustrated above and whilst noting that the emerging Local Plan has now been withdrawn, the District Council's intention for Thakeham is to significantly expand the village. Abingworth Fields to the south-east of the village has almost completed construction and accommodates a number of new facilities for the local community such as a new Cricket Ground, a Village Hall and a Café and convenience store. In addition and to the east of the proposed site, circa 500m away, is a Public House known as The White Lion Inn. As illustrated in the below Figure, a number of children play areas and public open spaces are also within close proximity to the site. As discussed in further detail later in this Statement, the site is well connected to the immediacy and local services.
- 2.10. Although not indicated in the below Figure, to the north of the site circa 1.31km is Kinsbrook Vineyard Restaurant and Grocery which provides the village with further access to every day essential items.



Figure 7 - Local Facilities

- 2.11. The site is additionally serviced by a number of Public Rights of Way (PROWs) which provides future occupants with easy walkable access to the above facilities.



Figure 8 - West Sussex County Council Public Rights of Way Map

- 2.12. As confirmed by the below Figures, Footpath Reference 2474 is hard standing for the entire length and is therefore suitable for buggies and wheelchairs.



Figure 9 - Photograph 1 of Footpath Reference 2474



Figure 10 - Photograph 2 of Footpath Reference 2474

- 2.13. It should be noted that an additional footpath is situated towards the end of Footpath 2474 which runs to the east, providing pedestrian connectivity to Storrington Road. Although it is noted that this is not identified as an official PROW on the WSCC maps, the path is hard standing (as evidenced in the below photographs) and connects to a pedestrian crossing on Storrington Road, which provides easy access to the new Abingworth site and facilities such as the Kitchen at Abingworth Football Club, Meadows Café & Store, the Cricket Ground and Thakeham Village Hall.
- 2.14. It is therefore clear that this is also an alternative, suitable and permanent footpath for future residents to use to access the facilities in Thakeham.

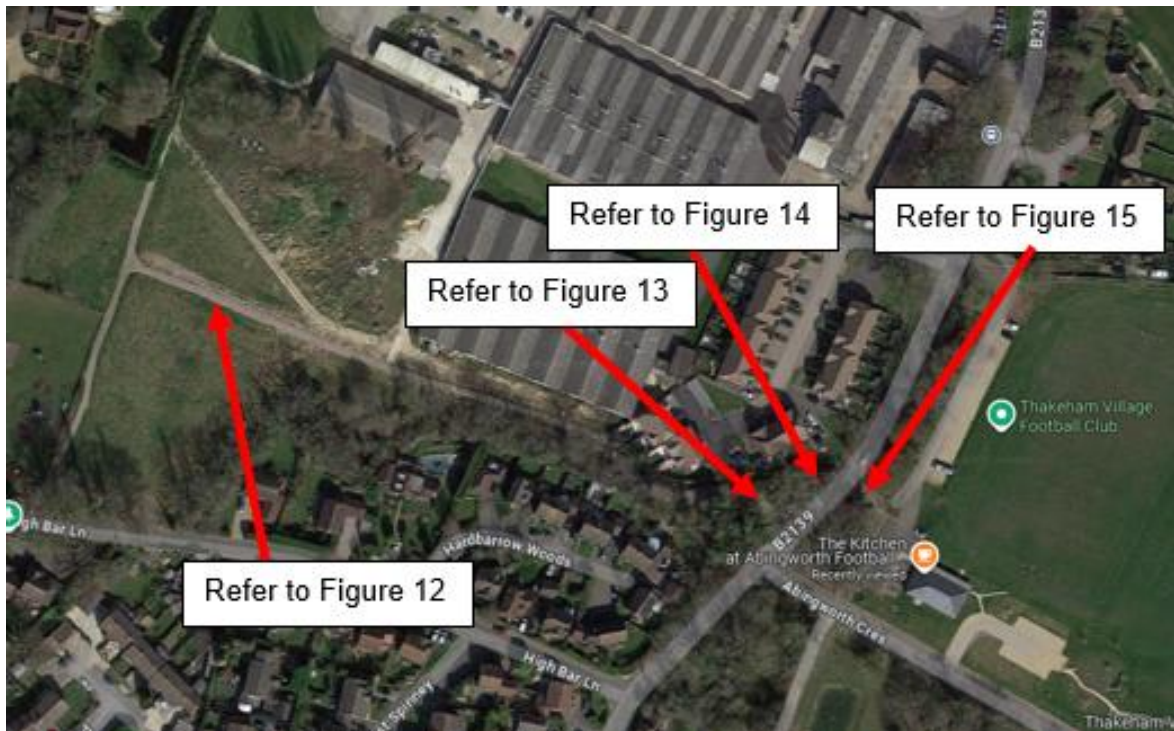


Figure 11 - Footpath to the South of Footpath Reference 2474



Figure 12 - Additional Southern Footpath Connecting to Storrington Road



Figure 13 - Path Leading from Footpath Reference 2474 to Western Side of Storrington Road



Figure 14 - Pedestrian Crossing on Western Side of Storrington Road



Figure 15 - Pedestrian Crossing on Eastern Side of Storrington Road

- 2.15. In addition to the above, two bus stops are located to the north of the site on Duke's Hill, providing sustainable transportation to nearby villages and wider Town's such as Horsham. These bus stops can be reached via the access road off Duke's Hill as illustrated below and would not require pedestrians to walk along Duke's Hill.



Figure 16 - Nearby Bus Stops

- 2.16. The Government's Flood Maps for Planning have been reviewed and reveal that the site is within Flood Zone 1 which means it has a low probability of flooding. Refer to Map below.

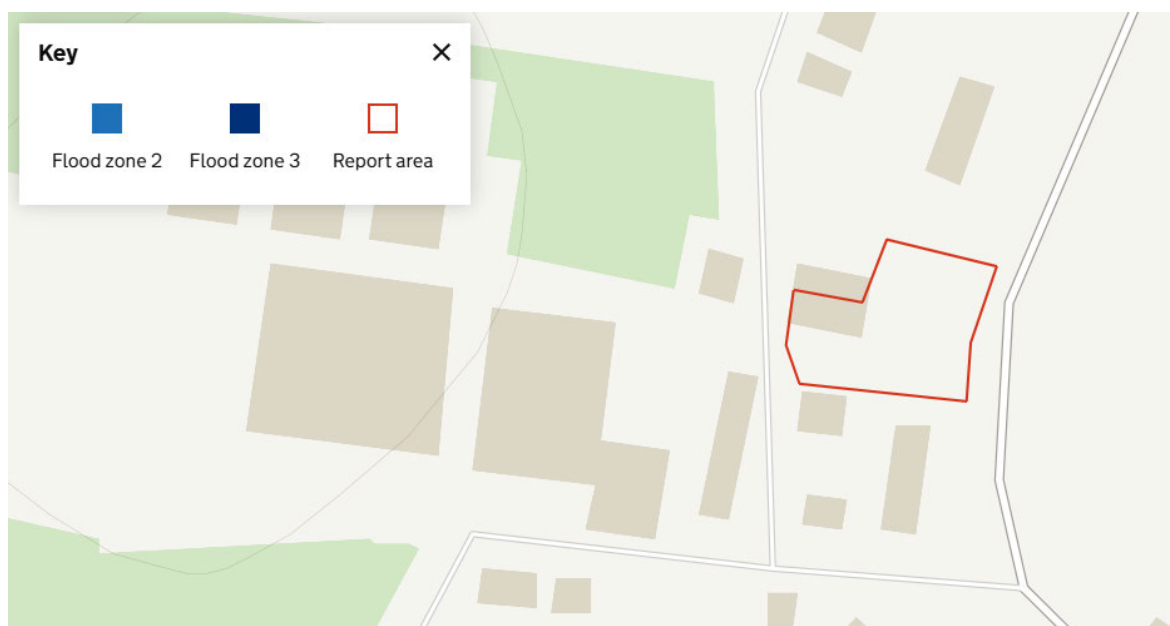


Figure 17 - Government's Flood Maps for Planning

- 2.17. In terms of surface water drainage, the site is not subject to any surface water flooding in any event (1 in 30 to 1 in 1000). Refer to Map below.

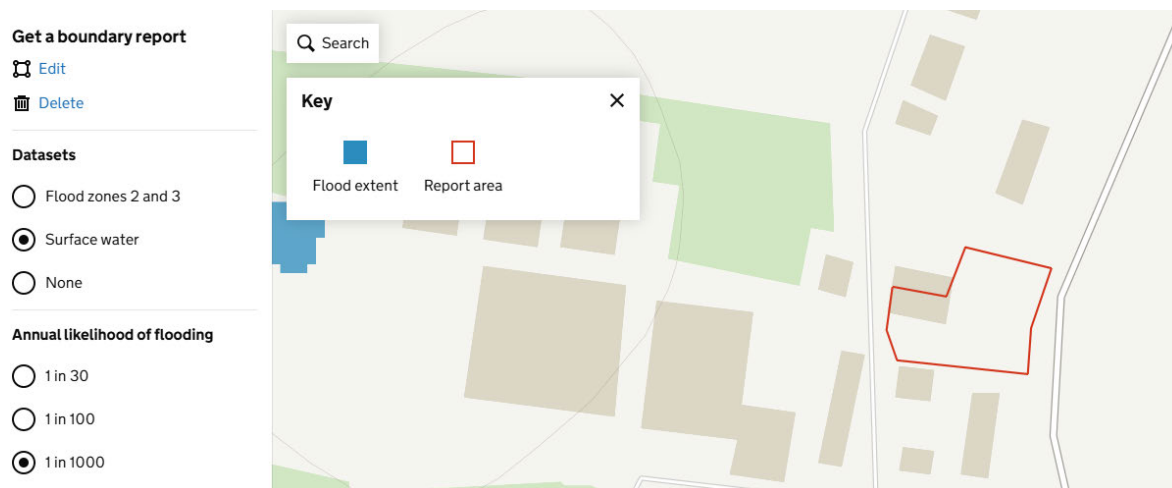


Figure 18 - Government's Flood Maps for Planning - Surface Water Drainage

### 3. Planning History

- 3.1. A review of the Horsham District Council online register reveals the following relevant planning history pertaining to the site and immediate area.

#### 3.2. The Site's Planning History

- 3.2.1. **Reference PE/24/0227. Demolition of Existing Storage Unit and erection of 3no. dwellings (1no. detached and 2no. semi-detached dwellings), associated private gardens, parking and landscaping. Dated January 2025.**
- 3.2.2. The Council noted that the site lies outside the defined Built-Up Area Boundary (BUAB) and within the countryside, where new residential development is typically more limited under Policies 3, 4 and 26 of the Horsham District Planning Framework (HDPF) and Policy 1 of the Thakeham Neighbourhood Plan. Although the site is not currently allocated for housing within the adopted or emerging Local Plan and does not directly adjoin a settlement boundary, the Council acknowledged the existing pattern of nearby built form and the site's potential to be viewed as a small-scale infill opportunity.
- 3.2.3. Given the Council's housing land supply shortfall (2.9 years at the time the pre-application response was prepared), officers recognised that applications outside defined boundaries may be considered in the context of the tilted balance. It was advised that a suitably justified scheme demonstrating clear planning benefits or exceptional circumstances could therefore be viewed more favourably.
- 3.2.4. In design terms, officers considered the architectural approach and materials generally sympathetic to the rural context but raised concern that three dwellings would appear cramped and could result in landscape harm given the site's topography and boundary vegetation. The Council suggested that reducing the scale of development or omitting one dwelling could improve visual impact and garden sizes.
- 3.2.5. No major amenity conflicts with neighbouring properties were identified, although the private amenity space for future occupiers was limited. The site's proximity to commercial uses would require assessment of potential impacts.
- 3.2.6. An Arboricultural Survey was recommended to assess the condition and retention of mature trees on site. Highways access and parking provision were considered acceptable in principle, subject to demonstrating appropriate turning space.
- 3.2.7. The pre-application response noted that a Water Neutrality Statement and likely off-site mitigation would be required however this is no longer a requirement, as discussed later in this Statement.
- 3.2.8. In addition, a minimum 10% Biodiversity Net Gain would need to be demonstrated in line with the Environment Act 2021.
- 3.2.9. Overall, the Council concluded that the principle of development was not supported under current policy but acknowledged that the proposal could be viewed more favourably - particularly in the context of housing supply - if the quantum/proposals were reduced in scale and supported by evidence of previously developed land status, water neutrality, and biodiversity mitigation.
- 3.2.10. The pre-application scheme can be seen overleaf:



Figure 19 - Pre-Application Indicative Site Layout (Reference PE/24/0227)

### 3.3. Townhouse Farm Planning History

- 3.3.1. As set out below, the wider area of Townhouse Farm has been subject to extensive planning history for the conversion of buildings to residential. The principle of residential development in this location has therefore clearly been established.
- 3.3.2. **Reference DC/20/1711. Demolition of existing commercial storage buildings and erection of two 2-bed semi-detached dwellings. Permitted 17 December 2020.**
- 3.3.3. The above application was permitted following Prior Approval consent under reference DC/19/0685 for change of use of the buildings to 4no. residential homes (see below). The above application has been subject to minor changes via S73 applications but has been implemented and is now fully occupied.
- 3.3.4. **Reference DC/19/0685. Prior Approval for a change of use from storage (Class B8) to dwellinghouse (Class C3). Permitted 19 May 2019.**
- 3.3.5. **Reference DC/14/1652. Change of use of farm office building to provide a 1 bedroom single storey residence (Prior Notification). Permitted 26 September 2014.**
- 3.3.6. **Reference T/54/02. Change of use of land to residential and erection of a garage. 4 Townhouse Cottages. Permitted 23 October 2002.**

## 4. The Proposal

- 4.1. The proposals seek to demolish the existing storage unit and erect 2no. dwellings with associated private garden space, car parking and landscaping. The proposed Site Plan can be seen below.



Figure 20 - Proposed Site Plan

- 4.2. The proposed dwellings would comprise of 2no. detached 3-bedroom dwellings of circa 123sqm, which would comply and exceed with Nationally Described Space Standards. The dwellings have been designed to achieve the optional M4(2) standard of Part M of the Building Regulations, with approaches, pathways, and gradients designed to provide accessible and adaptable homes.
- 4.3. The proposed dwellings would be two storeys in height and would accommodate similar ridge heights to neighbouring properties, as illustrated below. Due to the sloping nature of the site, Plot 1 sits slightly higher than Plot 2. Their rear garden accesses are arranged separately, allowing the garden levels to follow the natural slope of the site.



Figure 21 - Proposed Sections

- 4.4. A car port per dwelling, capable of accommodating 2no. cars per dwelling, are proposed to the front (west) of the proposed dwellings, as illustrated in the below Figure. The car ports would be of a traditional design, including pitched roofs.



Figure 22 - Proposed Sections including Car Ports

- 4.5. Vehicular access to the site would be achieved via Duke's Hill, via existing access. The visibility splays associated with this access are considered to be entirely acceptable and already serve a number of residential units.
- 4.6. The proposed dwellings would benefit from generous gardens to the rear of the properties (east). The existing hedgerow to the east falls outside of the Applicant's ownership boundary and therefore would be retained, providing existing and natural boundary treatment for the dwellings. Site boundaries are to be reinforced with new hedgerow and tree planting to further screen the development from adjoining properties. Further boundary treatment in the form of fences/enclosures would be determined at a later stage and subject to condition.
- 4.7. As set out in the accompanying Design & Access Statement (DAS), it is envisioned that a low-level post and rail fence with soft landscaping is proposed behind the car ports to establish a secure yet visually permeable boundary between public and private space. Refer to the DAS for further information.
- 4.8. Sufficient space is available within the Plots for cycle storage (in sheds) and hardstanding areas to store bins. Further details would be subject to condition.
- 4.9. In terms of materials, the proposals seek to accommodate clay red hanging tiles, half hipped roofs, white windows, a red facing brick and black rainwater goods.
- 4.10. In terms of drainage, the proposed application is supported by a Drainage Report which has been prepared by Motion. The report identifies that the proposals seek to accommodate composite permeable paving in the parking areas and geocellular soakaways in the rear gardens.
- 4.11. Refer to the accompanying DAS and plans for further information.

## 5. Policy Overview

### 5.1. Introduction

- 5.1.1. At the heart of the planning framework are Statutory Development plans, which seek to guide the decision-making process. 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 shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.1.2. In this case, the relevant Development Plan comprises the Horsham District Planning Framework (2015).
- 5.1.3. The National Planning Policy Framework (The Framework), the Planning Practice Guidance (PPG) and Supplementary Planning Guidance are material considerations, together with local guidance documents.
- 5.1.4. It should be noted that the adopted Horsham District Planning Framework is currently out of date by reason of it being over 5 years old. The Government require all Local Authorities to review the Local Plan every five years and therefore the Council are currently in the midst of preparing a new Local Plan for the District. Please refer to the below paragraph for further information.

### 5.2. Emerging Horsham District Local Plan 2023 – 2040 (Regulation 19 Version)

- 5.2.1. The Regulation 19 Local Plan was published for a six week period of representation from 19 January 2024 to 1 March 2024. The Regulation 19 Local Plan was then formally submitted to the Planning Inspectorate on 26 July 2024 and the examination hearings commenced in December 2024.
- 5.2.2. At the time of writing this Statement, the Local Plan hearings have been cancelled by the Inspector due to *'significant concerns about the soundness and legal compliance of the Plan in respect of a number of areas'*.
- 5.2.3. On 7 April 2025, a Letter was published by the Inspector which recommended to Horsham that the Local Plan should be withdrawn from examination and a new Local Plan should be prepared.
- 5.2.4. We understand that Horsham are in the midst of responding to this Letter but as it currently stands, the Regulation 19 version of the Local Plan is shortly to be withdrawn and cannot be considered to hold any weight in the determination of this application.

### 5.3. National Planning Policy Framework (NPPF)

- 5.3.1. The NPPF was adopted in 2012 with many revised versions, the most recent of which being updated in February 2025. The NPPF sets out the Government's planning policies for England and how these should be applied. The relevant sections of the NPPF in relation to this application are summarised below and explored in further detail later in this Statement.
- Chapter 2 (Achieving Sustainable Development)
  - Chapter 5 (Delivering a Sufficient Supply of Homes)
  - Chapter 9 (Promoting Sustainable Transport)
  - Chapter 11 (Making Effective use of Land)
  - Chapter 12 (Achieving Well-Designed Places)
  - Chapter 14 (Meeting the Challenge of Climate Change, Flooding and Coastal Change)
  - Chapter 15 (Conserving and Enhancing the Natural Environment)

## 5.4. Planning Practice Guidance (PPG)

- 5.4.1. The PPG was published by the Government in March 2014 and is updated regularly. The PPG supplement those overarching objectives of The Framework. The guidance provided by the PPG has been fully considered in the creation of this application and the proposals are seen to be fully compliant with it.

## 5.5. Strategic Planning Policy – Horsham District Planning Framework (2015)

- 5.5.1. The Horsham District Planning Framework (HDPF) was adopted in November 2015 and is the overarching planning document for Horsham District outside the South Downs National Park (SDNP) and replaces the Core Strategy and General Development Control Policies documents which were adopted in 2007.
- 5.5.2. Although the HDPF is out of date by reason of it being over 5 years old, the following policies are considered to be relevant to the application and have been given full consideration in the preparation of this application, as explored in further detail later in this Statement.

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

## 5.6. Shaping Development in Horsham District

- 5.6.1. The Council has produced the Shaping Development in Horsham District (SDPAN) document which is a material consideration in planning applications. The document sets out the Council's aspirations and the weight that can be given to current policy within the context of current legislation, national policy and guidance. The SDPAN document was endorsed at Cabinet on 17 September 2025 and has been reviewed in detail in the preparation of this application, as discussed in Section 6.

## 5.7. Thakeham Neighbourhood Plan (2017)

- 5.7.1. The Thakeham Neighbourhood Plan (TNP) was made by HDC on 26 April 2017 and contains policies, community aims, proposals and allocations which will influence and manage development within Thakeham.
- 5.7.2. It should be noted that the TNP is over five years old and not protected under the measures of the NPPF (as discussed in further detail later in this Statement). The TNP is therefore not considered to hold much weight in the determination of applications. Regardless, the following policies within the TNP are considered to be

relevant to the application and have been reviewed in the preparation of the application, but have not been afforded much weight as they are considered to be out of date.

- **Thakeham1 – A Spatial Plan for the Parish**
- **Thakeham6 – Design**
- **Thakeham10 - Green Infrastructure and Valued Landscapes**

## **5.8. Community Infrastructure Levy (CIL)**

- 5.8.1. CIL was adopted by HDC in October 2017 and is a charge placed on new residential development and ‘large format’ retail development (A1 to A5).
- 5.8.2. The site falls within Zone 1 and therefore, in accordance with Horsham’s CIL rate calculations table, new residential development is charged at £184.56 per sqm for 2025. This will be subject to change in accordance with the appropriate index figure which is amended in January every year.

## 6. Planning Appraisal

### 6.1. Introduction

6.1.1. The principal issues in relation to this development are as follows:

- **Principle of Development**
- **Design, Form and Appearance**
- **Residential Amenity**
- **Access, Transport and Parking**
- **Ecology and Biodiversity Net Gain**
- **Trees and Landscaping**
- **Drainage**

### 6.2. Principle of Development

6.2.1. The proposed development seeks full planning permission for the demolition of the existing storage unit and the erection of 2no. detached dwellings together with associated private gardens, parking, and landscaping. The existing building is a utilitarian storage structure of no architectural or heritage merit and its removal would provide an opportunity to make more efficient use of the land.

6.2.2. The site is located on land west of Coolham Road, which currently forms part of Townhouse Farm and includes land temporarily licensed to No. 2 Townhouse Cottages for use as additional garden space. The site is situated outside the defined Built-Up Area Boundary (BUAB) of Thakeham and is therefore designated as countryside for planning policy purposes.

6.2.3. In policy terms, the proposal must be considered against Policies 3 (Development Hierarchy), 4 (Settlement Expansion) and 26 (Countryside Protection) of the Horsham District Planning Framework (HDPF, 2015), as well as Policy 1 of the Thakeham Neighbourhood Plan (2017). These policies collectively seek to focus new development within settlement boundaries and resist inappropriate forms of development in the countryside unless a specific policy justification exists.

6.2.4. It is acknowledged that, in purely spatial terms, the proposal would represent development outside of the BUAB and therefore a departure from the adopted HDPF and Neighbourhood Plan. However, the weight that can be attributed to these policies is significantly reduced given that:

- The HDPF is now over five years old,
- Horsham District Council (HDC) cannot currently demonstrate a five-year supply of deliverable housing sites, with the latest monitoring report identifying only a 1-year supply, and
- The Thakeham Neighbourhood Plan is also more than five years old and does not benefit from the protection afforded under paragraph 14 of the NPPF.

6.2.5. As such, Paragraph 11(d) of the NPPF (2023) is engaged. This establishes the “tilted balance”, requiring that planning permission should be granted unless:

*“i. The application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for refusal; or*

*ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.”*

- 6.2.6. The NPPF further clarifies that policies are considered out-of-date where the local planning authority cannot demonstrate a five-year housing land supply. As such, the presumption in favour of sustainable development applies to this proposal on the basis that HDC can only demonstrate a 1-year supply of housing.
- 6.2.7. It is also material that the Government has recently increased the national housing target from 300,000 to 370,000 new homes per year, with higher growth directed towards areas experiencing the greatest affordability pressures and development capacity. Horsham, as part of the wider Gatwick Diamond area with strong market demand and high affordability constraints, is likely to fall within this higher-growth category. The delivery of two additional dwellings on underused land in this location would therefore directly support national objectives for increasing housing supply.
- 6.2.8. The emerging Horsham District Local Plan (HDLP 2024-2040) is currently under preparation however, following the cancellation of the examination hearings by the Inspector, the emerging policies presently carry limited weight and it is anticipated that the Plan will shortly be withdrawn. The emerging plan is therefore not considered to carry any weight at this moment in time.
- 6.2.9. Since the earlier pre-application advice (ref: PE/24/0227), HDC has replaced its Facilitating Appropriate Development (FAD) document with the Shaping Development in Horsham District Planning Advice Note (SDPAN, 2024). The SDPAN acknowledges the District's continuing housing shortfall and provides updated guidance on how proposals outside of built-up area boundaries will be assessed, encouraging appropriately located, small-scale and sustainable housing schemes where these contribute positively to local character and housing delivery.
- 6.2.10. The current proposal responds positively to this updated policy context. The quantum of development has been reduced from three dwellings to two detached homes, thereby ensuring a lower-density, more contextually appropriate form of development that better respects the semi-rural character of the site and its surroundings. The scheme will deliver a modest but valuable contribution to local housing supply while removing a redundant and unattractive storage building.
- 6.2.11. Although the site is located outside the BUAB, it benefits from good accessibility to services and facilities within Thakeham. Established footpaths provide safe pedestrian access to the village centre, and bus stops are located immediately outside the site on Coolham Road, offering connections to nearby settlements (as set out in detail earlier in this Statement). The site is therefore not isolated and future residents would have realistic opportunities to use sustainable modes of travel, in accordance with paragraph 129(c) of the NPPF.
- 6.2.12. A further material consideration relevant to the assessment of this proposal is the recent appeal decision at Abbots Leigh, Washington Road, Storrington (Ref: APP/Z3825/W/25/3363148) appended to this Statement. Although the appeal was ultimately dismissed, the Inspector's findings are instructive and carry weight given the similarities in policy context and the District's continued housing shortfall. Importantly, the sole reason for dismissal related to the inability of the appellant to secure water neutrality mitigation, an issue which is no longer applicable to this application following the lifting of Natural England's position on water neutrality in the Sussex North Supply Zone. The Inspector concluded that, absent this issue, the proposal benefitted from a range of positive attributes despite being located outside the Built-Up Area Boundary.
- 6.2.13. Of particular relevance is the Inspector's assessment that development outside a settlement boundary can nevertheless represent a sustainable and acceptable location for new housing where it is well contained, does not result in harmful sprawl or settlement coalescence, has access to nearby services, and contributes positively to addressing the district's acute housing undersupply. The Inspector confirmed that a site's position outside the BUAB is not determinative where policies restricting housing supply are out-of-date, noting that such proposals can perform well against the Framework's sustainability objectives and provide an important boost to housing delivery. These conclusions directly support the principle of development in this case, where the site is similarly physically contained, accessible, and capable of delivering modest but valuable housing in a district with only a 1-year housing land supply.
- 6.2.14. To summarise, while the proposal represents development outside the defined settlement boundary, the relevant local policies are out-of-date due to the lack of a five-year housing land supply. The tilted balance in paragraph 11(d) of the NPPF is therefore engaged. The development would:

- Replace an existing storage unit of limited value with two high-quality dwellings;
- Make efficient and appropriate use of previously developed land; and
- Contribute positively to local housing delivery in a sustainable and accessible location.

6.2.15. Accordingly, it is considered that the adverse impacts of granting permission would not significantly or demonstrably outweigh the benefits. The principle of residential development on this site is therefore considered acceptable.

## 6.3. Design, Form and Appearance

- 6.3.1. Policies 25 (The Natural Environment and Landscape Character), 32 (The Quality of New Development), and 33 (Development Principles) of the Horsham District Planning Framework (HDPF, 2015) collectively require that new development protects, conserves and enhances the landscape and townscape character of the District. These policies emphasise that proposals must be of a high quality of design, should relate sympathetically to their context, and should make a positive contribution to local character and sense of place.
- 6.3.2. The proposed scheme has been carefully designed to respond to the site's semi-rural character, its relationship with Coolham Road, and the established pattern of development in the surrounding area. The revised proposal has reduced the quantum of development from three dwellings to two, thereby addressing the Council's previous concerns regarding overdevelopment and potential landscape harm. This reduction allows for a more spacious layout, improved landscaping, and greater retention of existing boundary vegetation.
- 6.3.3. The proposed dwellings are two-storey detached houses of approximately 123sqm each, designed with traditional proportions and domestic scale reflective of nearby dwellings along Coolham Road and within the Townhouse Farm cluster. The ridge and eaves heights have been informed by surrounding built form and are broadly consistent with neighbouring properties, ensuring that the dwellings sit comfortably within the established roofscape and do not appear dominant when viewed from the public realm.
- 6.3.4. Given the natural slope of the site, Plot 1 is positioned slightly higher than Plot 2. The buildings are stepped sympathetically with the existing landform to minimise visual intrusion, and the garden levels follow the natural gradient of the land. This approach reduces the need for significant cut and fill operations and helps integrate the development more harmoniously into its landscape setting.
- 6.3.5. The dwellings are orientated to front onto the shared access, creating an attractive and legible frontage. The layout allows for meaningful separation between the two homes and their side boundaries, thereby avoiding the cramped appearance identified in the earlier pre-application feedback. The resulting spacing between the dwellings ensures the scheme reads as two individually designed rural dwellings, rather than a consolidated or suburban form of development.
- 6.3.6. The proposed dwellings adopt a vernacular rural design, drawing upon materials and detailing characteristic of the surrounding countryside and nearby properties. The design incorporates half-hipped clay tiled roofs, red multi-stock brickwork, and clay hanging tiles to upper elevations, complemented by white-framed windows and black rainwater goods. These materials are locally distinctive and will ensure that the development sits comfortably within its rural setting.
- 6.3.7. The proportions, fenestration, and roof forms are consistent with the traditional character of existing dwellings to the north and south. Architectural detailing has been kept simple and robust, providing a timeless and durable appearance while avoiding unnecessary pastiche. The inclusion of car ports with pitched roofs contributes to a coherent visual rhythm across the frontage and reinforces the rural domestic character.
- 6.3.8. The use of high-quality and natural materials will be secured by condition, ensuring a high standard of finish consistent with the expectations of HDPF Policies 32 and 33.

- 6.3.9. The scheme has been landscape-led, with careful consideration given to the site's edge-of-settlement character. The existing mature hedgerows and trees along the eastern and southern boundaries will be retained wherever possible, providing immediate visual containment and softening views of the new dwellings from Coolham Road and the wider countryside. Additional native planting and hedgerow reinforcement are proposed to strengthen boundary definition and enhance biodiversity value.
- 6.3.10. The reduction in unit numbers from three to two allows for enhanced landscape buffers and increased green space around the dwellings, reducing built form intensity and maintaining the verdant character of the site. The proposal will therefore preserve the rural transition between built development and open countryside, in accordance with Policy 25 of the HDPF.
- 6.3.11. Given the existing topography and the screening provided by vegetation, the proposed dwellings will be visually unobtrusive in wider landscape views. The development will not break the skyline or appear prominent from Coolham Road, and any limited glimpses will reveal dwellings of appropriate scale and high-quality design, consistent with local distinctiveness.
- 6.3.12. Overall, the proposed dwellings represent a high-quality, contextually appropriate and landscape-led design which responds positively to the feedback received at pre-application stage. The revised two-dwelling scheme achieves an appropriate balance between efficient use of land and protection of local character. Accordingly, the proposed development accords with Policies 25, 32 and 33 of the Horsham District Planning Framework and with the relevant design objectives of the National Planning Policy Framework (NPPF).

## 6.4. Residential Amenity

- 6.4.1. Policy 33 (Development Principles) of the HDPF requires that new development should be designed to ensure it does not cause unacceptable harm to the amenity of existing or future occupiers of land and buildings, having particular regard to issues of privacy, outlook, daylight, and noise. Developments should also provide an appropriate standard of amenity for future occupants.
- 6.4.2. The proposed development has been designed to ensure that it will not result in any unacceptable impacts on the residential amenity of existing neighbouring properties. The nearest residential dwellings are No. 2 and No. 3 Townhouse Cottages, located immediately to the north of the application site. The proposed dwellings would be sited approximately 8.4m from No. 3 Townhouse Cottages and 13.6m from No. 2 Townhouse Cottages, as shown below. These separation distances are an improvement from the pre-application scheme and are consistent with those found within the surrounding area. The distances are sufficient to prevent any loss of privacy, outlook, or light to neighbouring occupiers.



Figure 23 - Proposed Separation Distances

- 6.4.3. The existing outbuilding associated with No. 3 Townhouse Cottages, located adjacent to the northern boundary, is a single-storey ancillary structure of limited height and use, with no windows on the northern elevation.. Given its scale and relationship to the proposed dwellings, there would be no undue impact on its function or the residential amenity of No. 3 Townhouse Cottages.
- 6.4.4. The proposed dwellings are orientated and positioned carefully to avoid direct overlooking or inter-looking between existing and proposed habitable room windows. No side windows are proposed. The overall arrangement ensures that the development would not result in any unacceptable perception of overlooking or overbearing impact on adjacent dwellings, in accordance with Policy 33 of the HDPF.
- 6.4.5. Each of the proposed dwellings would benefit from generous private garden areas to the rear, providing a high-quality external amenity space proportionate to the size of the homes. The reduction in unit numbers from three dwellings to two directly responds to the Council's pre-application feedback, allowing for larger garden spaces, enhanced separation between buildings, and greater opportunities for soft landscaping. The resulting plots now provide a comfortable balance between built form and open space, ensuring an appropriate standard of amenity for future residents.
- 6.4.6. Internally, both dwellings have been designed to exceed the Nationally Described Space Standards and achieve the optional M4(2) accessibility standard, providing functional, adaptable and comfortable living environments for future occupants. Adequate space is provided within each plot for cycle and refuse storage, with clear and convenient access to the highway.

- 6.4.7. The site lies adjacent to Townhouse Farm and some commercial/agricultural activity occurs in the wider area. However, the storage building currently occupying the application site provides a level of separation between the existing commercial uses and nearby residential properties. The proposed removal of the storage building and replacement with residential dwellings will not introduce any new sources of noise or disturbance.
- 6.4.8. In summary, the proposals therefore fully accord with Policy 33 of the HDPF and the relevant provisions of the NPPF, which seek to ensure that new development secures a good standard of amenity for all existing and future occupants.

## 6.5. Access, Transport and Parking

- 6.5.1. Policies 40 (Sustainable Transport) and 41 (Parking) of the HDPF require that development provides safe and suitable access for all users, promotes sustainable transport choices, and ensures adequate parking provision that meets the needs of anticipated users. These policies align with the objectives of Section 9 (Promoting Sustainable Transport) of the NPPF, which emphasises that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe.
- 6.5.2. The site is located in a reasonably sustainable and accessible location on Coolham Road, within convenient walking distance of local services and facilities in Thakeham. The site benefits from established pedestrian footpaths connecting to the village, local schools, and bus stops located immediately adjacent to the site on Coolham Road. These bus services provide regular connections to Storrington, Billingshurst, Pulborough, and Horsham, thereby reducing the need for reliance on the private car. Refer to Appendix C for the bus schedule which further demonstrates the regular bus services provided.
- 6.5.3. The proximity of sustainable transport options, alongside the availability of safe pedestrian routes, ensures that future occupiers will have realistic alternatives to private car use, consistent with the sustainable transport objectives of Policy 40 of the HDPF and the NPPF.
- 6.5.4. Vehicular access to the site will be achieved via the existing access from Duke's Hill, which currently serves several existing residential dwellings. The access benefits from good visibility splays in both directions, and no alterations are required to accommodate the modest increase in vehicle movements associated with two additional dwellings.
- 6.5.5. Since the pre-application stage, the site layout has been significantly amended to simplify the internal access arrangement. The previous proposal for an internal access road has been removed, with parking now positioned directly off the existing access road. This revised layout represents a more efficient and safer design, reducing internal vehicle manoeuvring, improving visibility for both drivers and pedestrians, and making better use of available space. The access geometry and alignment have been reviewed and confirmed as suitable for the expected traffic volumes.
- 6.5.6. Given the small scale of the scheme, comprising only two dwellings, the development will not generate a material increase in vehicle movements, and therefore no adverse highway safety impacts are anticipated. In accordance with paragraph 116 of the NPPF, the residual cumulative impacts of the development on the highway network would be negligible and clearly not "severe."
- 6.5.7. Policy 41 of the HDPF and the West Sussex County Council (WSSC) Guidance on Parking at New Developments (2020) require that parking is provided in accordance with the size, type and location of the dwellings. The site falls within Parking Zone 1, where the requirement for a 3-bedroom dwelling is approximately 2.2 spaces per unit.
- 6.5.8. Each proposed dwelling is provided with at least two dedicated parking spaces located within car ports positioned conveniently to the front of each plot. A further two parking spaces per dwelling could be provided outside of the car ports if necessary. The layout therefore accords with WSSC's adopted standards.

- 6.5.9. Provision has also been made for electric vehicle (EV) charging points within each car port in accordance with Building Regulations, promoting low-emission travel and future-proofing the development. Secure cycle storage is also provided within each plot to encourage active travel choices and can be secured by condition.
- 6.5.10. In summary, the proposed development provides a safe, efficient and sustainable access arrangement, with parking provision fully compliant with local and national policy. Accordingly, the proposals are fully compliant with Policies 40 and 41 of the Horsham District Planning Framework and the relevant provisions of Section 9 of the NPPF, ensuring that the development can be safely and suitably accessed by all users.

## 6.6. Ecology and Biodiversity Net Gain

- 6.6.1. An Ecological Appraisal and a Biodiversity Gain Statement (including Metric) have been prepared by Essential Ecology in support of this application.
- 6.6.2. The following conclusion is provided in the Ecological Appraisal:

*“8.1.1 Essential Ecology has undertaken an Ecological Appraisal of the site based on the results of a desktop study, extended UK Habitat Survey and habitat suitability assessments for protected species, particularly including Badger, bats, Great Crested Newts and nesting birds. Specific emergence survey work has also been undertaken in respect of roosting bats and building B1.*

*8.1.2 The implementation of recommended mitigation measures will ensure the ecological value of the site and protected species are safeguarded. A number of enhancement measures could also be implemented to provide an ecological betterment over the existing situation in line with local and national planning policy.*

***8.1.3 On this basis, the proposed development is not considered likely to result in significant adverse impacts to biodiversity at the site or in the local vicinity either alone or in combination with other projects.”***

- 6.6.3. In terms of BNG, the accompanying Report concludes that *“the development of the site will result in a net loss of habitat and therefore, additional habitat units will likely need to be acquired from a habitat bank in order for the pre-commencement biodiversity gain condition to be discharged.”* Where possible, the off-site credits will be sought as close as possible to the site.
- 6.6.4. To conclude, the proposals are considered to be entirely acceptable with regards to ecology and BNG. Further information can be secured by condition.

## 6.7. Trees and Landscaping

- 6.7.1. This application is supported by an Arboricultural Impact Assessment & Method Statement, a Tree Retention and Protection Plan and an Existing Tree Schedule which has been prepared by Lizard Landscape Design and Ecology.
- 6.7.2. The following conclusion is provided in the AIA:

*“Over all impacts relating to tree and hedgerow removals is considered to be **low**, and impacts from any tree surgery are also considered **low**. It should be noted that the vast majority of potential impacts to trees around the boundary of the site are associated with the new landscaping. Regarding the 2no proposed plots, with the removal of 2no mature Ash it achieves **minimal** possible RPA incursions.*

*Provided that mitigation planting is in line with current guidelines and all other protection measures are properly enacted, the loss of trees from the site would be adequately compensated and the proposals would accord with the requirements of BS5837.*

*The protection, compensation and enhancement detailed herein have been designed to ensure the ongoing favourable status of retained trees and vegetation, and the species which use these. Additionally, adherence to the methods detailed will ensure that all works accord with the relevant wildlife legislation and planning conditions.”*

- 6.7.3. To conclude, the proposals are considered to be entirely acceptable in terms of arboriculture.

## 6.8. Drainage

- 6.8.1. Policy 38 (Flooding) of the HDPF seeks to ensure that development does not increase the risk of flooding elsewhere and incorporates appropriate measures for the management of surface water and foul drainage. This is consistent with the requirements of Section 14 (Meeting the Challenge of Climate Change, Flooding and Coastal Change) of the NPPF which requires new development to be planned to avoid flood risk and to manage surface water sustainably.
- 6.8.2. A Drainage Strategy prepared by Motion supports this application. In summary, the Strategy identifies that the site lies entirely within Flood Zone 1 and is at very low risk of surface water flooding, making it suitable for residential development in accordance with Policy 38 of the Horsham District Planning Framework (HDPF) and Section 14 of the NPPF.
- 6.8.3. The proposed drainage strategy follows the drainage hierarchy and SuDS principles, incorporating permeable paving within parking areas and geocellular soakaways in the rear gardens to manage surface water on site. The system has been hydraulically modelled to accommodate the 1 in 100-year storm event plus 45% climate change allowance without flooding, and includes measures for pollution control and long-term maintenance.
- 6.8.4. Foul water will connect to the existing public sewer in Duke's Hill, which has sufficient capacity to accommodate the development.
- 6.8.5. The report concludes that the proposals will not increase flood risk on or off site and that both foul and surface water can be managed sustainably and effectively. Any remaining details, such as final soakage testing, can be secured by planning condition.
- 6.8.6. Accordingly, the proposals accord with Policy 38 of the HDPF and the relevant provisions of the NPPF.

## 7. Conclusion

- 7.1. This Planning Statement including Energy and Sustainability Statement has been produced by ECE Planning on behalf of our client, Fowlers Land and New Homes in support of a Planning Application for development at Land adjoining No. 2 and No. 3 Townhouse Cottages, Coolham Road, Thakeham ('the Site'). The description of the proposal reads:

*"Demolition of Existing Storage Unit and erection of 2no. detached dwellings, associated private gardens, parking and landscaping."*

- 7.2. This application follows pre-application discussions with Horsham District Council (HDC) under reference PE/24/0227 for the *"Demolition of Existing Storage Unit and erection of 3no. dwellings (1no. detached and 2no. semi-detached dwellings), associated private gardens, parking and landscaping."* Following feedback received from HDC, the quantum of development has been reduced from 3no. dwellings to 2no. dwellings.
- 7.3. This Planning Statement has demonstrated that the proposed development represents a sustainable and high-quality form of development that accords with national and local planning objectives. This conclusion is reinforced by the recent Abbots Leigh appeal decision, where the Inspector confirmed that small-scale, sustainably located housing outside the Built-Up Area Boundary can be acceptable in principle in the context of Horsham's acute housing shortfall, with the only reason for dismissal in that case relating solely to water neutrality, a constraint that no longer applies to this proposal.
- 7.4. While the site lies outside the defined Built-Up Area Boundary of Thakeham and therefore constitutes a departure from the Horsham District Planning Framework (HDPF) and the Thakeham Neighbourhood Plan, both plans are now more than five years old and the Council is unable to demonstrate a five-year supply of deliverable housing sites. Accordingly, the presumption in favour of sustainable development, as set out under paragraph 11(d) of the National Planning Policy Framework (NPPF), is engaged.
- 7.5. The proposal delivers a number of clear and demonstrable benefits, including:
- The removal of an unattractive and redundant storage structure of no architectural or heritage merit;
  - The efficient and sensitive redevelopment of underused land in a sustainable and accessible location;
  - The provision of two high-quality, family-sized homes that will make a modest but valuable contribution to local housing supply;
  - A design and layout that responds positively to the site's semi-rural context, respecting the established pattern of development and enhancing local character; and
  - New landscaping and biodiversity enhancements that will deliver ecological net benefits and reinforce the site's green, rural character.
- 7.6. The technical assessments accompanying this application confirm that the development is acceptable in all other respects:
- Design and appearance: The dwellings are of an appropriate scale, massing, and vernacular design that reflects local distinctiveness, in accordance with Policies 25, 32, and 33 of the HDPF.
  - Residential amenity: The scheme ensures suitable separation from neighbouring dwellings and provides high-quality internal and external living environments, in full compliance with Policy 33.

- Access and parking: The proposal utilises an existing safe access, provides parking in line with adopted standards, and offers convenient access to sustainable transport options, consistent with Policies 40 and 41 of the HDPF.
- Ecology and biodiversity: The proposals will safeguard protected species and provide ecological enhancement in line with national and local policy.
- Trees and landscaping: The arboricultural assessment concludes that impacts are low and that proposed mitigation and new planting will adequately compensate for any loss, ensuring compliance with BS5837.
- Drainage: The site lies within Flood Zone 1, and the proposed SuDS-based strategy demonstrates that surface and foul water can be managed sustainably on site, in accordance with Policy 38 of the HDPF.

- 7.7. Taken as a whole, the benefits of the proposal clearly outweigh any limited harm arising from its location outside the Built-Up Area Boundary. The development represents a logical and proportionate form of small-scale growth that aligns with the aims of the NPPF to significantly boost the supply of homes, make efficient use of land, and deliver well-designed, sustainable places.
- 7.8. Accordingly, it is concluded that the proposal constitutes sustainable development for the purposes of the NPPF. In the absence of any adverse impacts which would significantly and demonstrably outweigh the benefits, planning permission should therefore be granted.

## **Appendix A – Pre-Application Response for Reference PE/24/0227 Dated January 2025**

Dear Chris Barker,

**Location:**

Townhouse Farm  
Coolham Road  
Thakeham  
West Sussex  
BN11 2EN

**Details:**

[PE/24/0227]

Demolition of Existing Storage Unit and erection of 3no. dwellings (1no. detached and 2no. semi-detached dwellings), associated private gardens, parking and landscaping.

Thank you for your enquiry in respect of the above and my apologies for the delay in replying. I can advise as follows: -

**Principle of development**

The application site is situated outside of the defined built up area in a countryside location and no other statutory designations. The site is within a rural area characterised by farms, commercial uses and individually designed dwellings. The site is located on the west side of Coolham Road. Access currently exists to the site via a private access from Coolham Road which is shared with the existing Townhouse Farm

The application site lies in the countryside outside of the identified built-up area of any settlement. Given this location, the initial principle of the proposal must be considered in the context of Policies 3, 4, and 26 of the Horsham District Planning Framework (HDPF) and Policy 1 of the Thakeham Neighbourhood Plan. Given that the application is outside of the built up area boundary, and is not allocated for housing it would be contrary to policies 3,4 and 26 of the HDPF.

The emerging Horsham District Local Plan (HDLP) is currently being prepared and sets out emerging planning policies and proposals to guide development in the District (excluding the South Downs National Park) up to 2040. The emerging local plan previously only held limited weight in regards to its policies, however the examinations of the plan were recently cancelled by the Inspector. Until the council received further instruction the policies within the plan only hold limited weight. The application site is not allocated for housing within the emerging local plan, such that it would represent conflict with the emerging HDLP and has not been allocated within the Thakeham Neighbourhood plan.

Strategic Policy 2 of the HDLP promotes a similar development hierarchy and permission of development within the defined BUAB as in Policy 3 of the HDPF and states that any infilling and redevelopment would be required to demonstrate that it is of an appropriate nature and scale to maintain the characteristics and function of the settlement in accordance with the settlement hierarchy.

The Council cannot currently demonstrate a 5-year housing land supply (the Council's latest Authority Monitoring Report shows a 2.9 year supply). In recognition of these HDPF housing policies being out-of-date, the Council has published interim guidance on how housing proposals are to be considered in its Facilitating Appropriate Development (FAD) document. The FAD recognises that the Council is likely to receive applications outside of defined BUAB and on unallocated sites (such as this proposal) given its housing land supply position. The

FAD confirms that applications which meet all the following criteria will be positively considered:

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

The application site does not adjoin the settlement edge of Thakeham such that it would not be in accordance with the FAD. The proposal therefore would not be acceptable in principle. Without exceptional circumstances to balance this conflict with the HDPF and HDLP, the proposal would be refused if it were submitted in its current format.

### **Design/ Landscape Impact**

Policy 32 and 33 of the HDPF seeks to ensure that development promotes a high standard and quality of design in order to enhance and protect locally distinctive characters. The policies also seek to ensure that the scale, massing and appearance of development 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.

Strategic Policies 19 and 20 of the emerging HDLP require high-quality, beautiful and inclusive design which conserves and enhances the natural and built environment, and reflects the local, physical, social, economic, environmental and policy context. In particular, Strategic Policies 19 and 20 support development which, inter alia, is: attractive, functional, safe and adaptable; compliments and respond to locally distinctive characters; contributes to a sense of place; makes efficient use of land; provides a good standard of amenity for existing and future occupants; is of a sympathetic scale, massing and appearance; uses high standards of building materials and landscaping; allows sufficient space for general waste and recycling provision; and makes a clear distinction between public and private spaces.

The current application site is being used as residential land by the adjoining neighbouring property. The proposed design takes cues from the neighbouring properties to the south and north, in terms of hanging tiles, half hipped roofs and scale which would generally be considered to be appropriate for this countryside setting. Nevertheless, given the topography of the application site which rises steeply from the main road to the application site and currently benefits from mature hedging and trees, there is concern that there would be some landscape harm arising from the proposal such that a slight reduction in the scale of the dwellings may allow for additional retention of the trees and hedges in this location. A reduction in scale to the dwellings would provide additional benefit/ or of removal of one unit so as to not appear as tightly fitting within the plots and would allow a more reasonable residential curtilage which currently would be very minimal. No elevations have been submitted for the neighbouring dwellings such that it is not possible to compare the eaves and ridge heights of the proposed dwellings which would be helpful in the event of a full submission. The design of the dwellings would be acceptable, however the form the three dwellings take cumulatively would result in a cramped form of development and a simple improvement to the visual appearance of the site would be to remove one of the dwellings such that the landscaping along the main road can be preserved and that would allow an improved garden space for future occupiers.

### **Amenity**

Policy 33 of the HDPF states that development should consider the scale, massing and orientation between buildings, respecting the amenities and sensitivities of neighbouring properties.

As discussed during the pre-app meeting, the proposed development is unlikely to result in an unacceptable relationship in terms of loss of outlook, obtrusive appearance or loss of light to the neighbouring dwellings. Furthermore and discussed in the above section of this report, the amenity space for the future occupiers would be limited and the removal of one dwelling would be considered to allow a more reasonable garden space that would be anticipated for three bedroom homes of this size. There would be a degree of mutual overlooking between the three dwellings and the existing buildings garden spaces, however no direct overlooking into habitable rooms would occur as a result of the development.

Overall, the residential amenity space for the future occupiers could be improved, however the proposal would not be sufficiently harmful to warrant a refusal. As per the discussion in the pre-application meeting, given the sites location next to agricultural buildings/commercial units, the development would need to demonstrate that there would be no contaminated soil or potential for harm due to unacceptable levels of noise.

### **Trees**

Policy 33 of the HDPF states that development should 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. Policy 31 of the HDPF states that where felling of protected trees is necessary, replacement planting with a suitable species would be required.

There are trees within the application site that appeared from the site visit to be mature such that it is recommended that an Arboricultural survey is undertaken in the event of a full application.

### **Highways Impact**

Policy 40 of the HDPF supports proposals which provide safe and suitable access for all vehicles, pedestrians, cyclists, horse riders, public transport and the delivery of goods, whilst Policy 41 requires adequate parking facilities within developments.

The turning spaces would need to be demonstrated to evidence that vehicles can access the parking spaces outlined. The dwellings are proposed to be served by two spaces each which would be considered sufficient, however WSCC have their own pre-application advice service available if the applicant would like to enquire as to the acceptability of future plans.

### **Water Neutrality**

The application site falls within the Sussex North Water Supply Zone as defined by Natural England which draws its water supply from groundwater abstraction at Hardham. Natural England has issued a Position Statement for applications within the Sussex North Water Supply Zone which states that it cannot be concluded with the required degree of certainty that new development in this zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites.

Natural England advises that plans and projects affecting sites where an existing adverse effect is known will be required to demonstrate with sufficient certainty that they will not contribute further to an existing adverse effect. The received advice note advises that the

matter of water neutrality should be addressed in assessments to agree and ensure that water use is offset for all new developments within the Sussex North Water Supply Zone.

No information has been submitted in respect of Water Neutrality. It is advised that the applicant go to the Horsham District council website for guidance on how to prepare a Water Neutrality statement. The current application site would likely be considered to have a nil baseline and there does not appear to be sufficient space within the site to allow for mitigation measures that would be entirely on site. Additional offsite mitigation is therefore likely required.

Further information can be found at:

<https://www.horsham.gov.uk/planning/water-neutrality-in-horsham-district/water-neutrality-and-planning-applications>

The applicant requested to know if the proposal would be eligible to enter into the council's SNOWs scheme. To be eligible for this, the development would have to be within an allocated site for housing and not exceed 85 litres per person per day in water usage. The proposal is not therefore eligible for SNOWs.

### **Biodiversity Net Gain**

Biodiversity Net Gain (BNG) is an approach introduced under the Environment Act 2021, to ensure that developments and land management leave the natural environment in a better state than it was before. It contributes towards nature recovery by helping to deliver habitat creation and enhancements as part of the design of new development.

There is now a statutory requirement to provide a minimum of 10% BNG on development sites. Further information can be found at: -

<https://www.horsham.gov.uk/planning/planning-applications/biodiversity-net-gain>

### **Summary**

The proposed development would not be acceptable in principle given its conflict with policy 26 of the HDPF. It would not be acceptable under the FAD given the proposal would not adjoin a BUAB and has not been allocated within the neighbourhood plan or the emerging local plan.

Whilst the principle of development would be unacceptable with regards to Policy 26 of the HDPF, the councils housing shortage is noted and the application would be decided in light of the tilted balance. It is further acknowledged that the context of the site would be an infill in built form and viewed within the context of a cluster of existing built form where the land may be seen as previously developed land. The developer would need to demonstrate that the land has been previously developed to be considered as such and as per the comments above, the application may be viewed more favourably with the removal of one of the dwellings given the cramped layout currently proposed.

Should an application be submitted, the following information would be required:

- Location Plan
- Block Plan
- Proposed Floor and Elevation Plans
- Planning Statement
- BNG Statement and Metric
- Preliminary Ecological Survey
- Arboricultural Impact Assessment
- Tree Survey

- Plan to demonstrate Vehicle turning

I hope this is of some assistance. The above comments are given as the opinion of the Case Officer and do not prejudice any outcome of a subsequent application. Should you submit a formal planning application, please quote reference number PE/24/0227 in your submission.

Hannah Darley  
Senior Planning Officer

## **Appendix B – Appeal decision at Abbots Leigh, Washington Road, Storrington (Ref: APP/Z3825/W/25/3363148)**

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## Appeal Decision

Site visit made on 22 September 2025

by **C Walker BA (Hons) DipTP MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 06 October 2025

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**Appeal Ref: APP/Z3825/W/25/3363148**

**Abbots Leigh, Washington Road, Storrington, West Sussex RH20 4AF**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant outline planning permission.
  - The appeal is made by Mr David King against the decision of Horsham District Council.
  - The application Ref is DC/24/1965.
  - The development proposed is described as 'outline planning application with all matters reserved apart from access for 1no. 4-bedroom dwelling with associated private garden space, car parking and landscaping'.
- 

### Decision

1. The appeal is dismissed.

### Preliminary Matters

2. The appeal scheme relates to an outline proposal, with all matters, other than the means of access, reserved for future consideration. I have dealt with the appeal on that basis.
3. A plan has been submitted which indicates how residential development could be accommodated on the site along with indicative elevation and floor plans. Aside from the means of access, I have taken these into account for indicative purposes only.
4. My attention is drawn to an emerging Draft Local Plan submitted under Regulation 19<sup>1</sup>. Evidence indicates there is considerable doubt that this plan will proceed, following a recommendation from the examining Inspector that it should be withdrawn and a new plan prepared. Both parties agree it attracts limited weight and in any event, I have not been provided with relevant policies so I have not had regard to it.
5. The site lies close to the South Downs National Park (NP). The duty to conserve and enhance the natural beauty and special qualities of the NP extends to consideration of its setting. However, this is not a matter in dispute between the parties, and I am satisfied that the duty would be met. Therefore, I do not deal with the matter any further.
6. An Aboricultural Appeal Statement dated 21 March 2025 by PJC Consultancy Ltd accompanied the appeal. The Council has commented on it as part of their statement of case. It indicates that, subject to conditions, this has overcome its second refusal reason. From the evidence before me, I have no reason to disagree. Therefore, it is not necessary for me to consider the matter further.

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<sup>1</sup> of the Town and Country Planning (Local Planning) (England) Regulations 2012

7. The appeal site falls within the Sussex North Water Supply Zone (SNWSZ) as defined by Natural England, where water abstraction has the potential to adversely affect the Arun Valley Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site (hereafter the Arun Valley sites). It is a European Designated Site afforded protection under the Conservation of Habitats and Species Regulations 2017 as amended (the Habitats Regulations). Although not forming part of the Council's reason for refusal, as competent authority I must consider whether the development is likely to have a significant effect on the integrity of the site. It is therefore necessary to consider this as a main issue. The main parties have had the opportunity of commenting on this.
8. A Unilateral Undertaking (UU) has been submitted with this appeal to secure the development as a self-build dwelling, and includes mitigation relating to water neutrality, a matter I return to in my reasoning below. The Council has had the opportunity to comment on this, so is not prejudiced by my acceptance of it.

## **Main Issues**

9. In light of the above, the main issues are:
  - whether the appeal site is a suitable location for the development, having particular regard to relevant provisions of the development plan and the Framework; and
  - the effect of the development on the integrity of the Arun Valley sites.

## **Reasons**

### *Whether suitable location*

10. The appeal site relates to part of the garden serving Abbots Leigh, located on Washington Road within the parish of Storrington and Sullington. It lies outside of the settlement boundary, in the open countryside as defined in the Horsham District Planning Framework (adopted 2015) (the HDPF) and the Storrington, Sullington and Washington Neighbourhood Plan 2018-2031 (made 2019) (the NP).
11. A strategic approach to development is set out in HDPF Policy 2 which focuses development in and around the key settlement of Horsham, which sits at the top of the district's settlement hierarchy. Storrington and Sullington fall into the second tier of the hierarchy, 'Smaller Towns and Larger Villages' Settlement Type under HDPF Policy 3. These settlements are stated as having a good range of services and facilities, strong community networks and local employment provision, together with reasonable public transport options. The settlements act as hubs for smaller villages, but also have some reliance on larger settlements / each other to meet some of their requirements. HDPF Policy 3 and NP Policy 1, support development within the built-up area boundaries (BUAB's), on allocated sites or in accordance with other development plan policies for the location of development in the countryside.
12. HDPF Policy 4 states that outside of BUABs, the expansion of settlements will be supported where the site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge, where the level of expansion is appropriate to the scale and function of the settlement type. In addition, the development must be demonstrated to meet the identified local housing needs or assist the retention and enhancement of community facilities and avoid prejudice

to comprehensive long-term development. The final criterion is that the development should be within an existing defensible boundary and the landscape and townscape character features are maintained and enhanced.

13. While the proposal for one dwelling would be appropriate for the scale and function of the settlement type, the site is not allocated, nor does it adjoin an existing settlement edge. Given the Council's inability to meet its five-year housing land supply (5YHLS), the proposal would help to address an unmet housing need and would not prejudice long-term development. The appeal proposal would be well contained by the existing dwelling of Abbots Leigh and Sandgate Lodge on its opposite side, as well as the designated Sandgate Country Park to its north, which limits its sprawl into the rural area and thus meets the final criterion.
14. However, as the appeal site does not adjoin a settlement edge, nor is it allocated for residential development in the Local Plan or NP, it does not comply with the first part of criterion 1 to HDPF Policy 4. As a result, the proposal is contrary to this policy.
15. Policy 26 of the HDPF seeks to protect the countryside from inappropriate development, requiring development outside of BUAB's to be essential to its countryside location and to meet one of 4 listed exceptions. This proposal would not meet any of these exceptions, bringing the scheme into conflict with this policy.
16. In light of the above, the appeal site is not a suitable location for the development, having regard to the relevant provisions of the development plan and the Framework. The appeal scheme runs counter to policies 1, 2, 3, 4 and 26 of the HDPF and NP Policy 1, which amongst other matters, seek to achieve sustainable development.

#### *Integrity of the Arun Valley sites including Appropriate Assessment*

17. The Arun Valley sites are low lying wetland areas that support rare and diverse plants, invertebrate and bird assemblages as qualifying features. Variation in soils and water supply lead to a wide range of ecological conditions and rich flora and fauna. Natural England issued a Position Statement in September 2021 which advised that due to the additional demand for water abstraction, it cannot be concluded with the required degree of certainty that new development in the SNWSZ would not have an adverse effect on the integrity of the site. The proposal would create a net gain of one dwelling, and in combination with other development permitted in the area, there would be a likely significant adverse effect on the Arun Valley sites.
18. The Position Statement sets out an interim approach requiring plans and projects, affecting sites where an existing adverse impact is known, to demonstrate certainty that they will not contribute further to the existing adverse impact. Regulation 75 of the Habitats Regulations requires an Appropriate Assessment to be carried out to demonstrate the required water neutrality.
19. Natural England sets out the definition for water neutrality is the use of water in the supply area before the development is the same or lower after the development is in place. Water neutrality can be achieved through a combination of water efficiency measures in new buildings and water offsetting.

20. The submitted Water Neutrality Statement sets out proposed on-site water reduction measures, such as fixtures and fittings to be used in the development. Measures would also be required to off-set the residual demand and both parties agree that the purchasing of off-site credits would be an acceptable approach to mitigation. I have no reason to disagree with the views of the Council and Natural England that the strategy advanced would achieve water neutrality, subject to securing the mitigation.
21. Concerns have been raised that the submitted UU only ties the appellant to purchase off-setting credits and does not obligate the land-owners, or other interested parties, to undertake the necessary water off-setting works. The appellants evidence contends that the submitted UU is appropriate to secure mitigation on the basis that the appellant has signed contractual terms with the off-setting provider and paid a substantial deposit. However, evidence of this contractual arrangement has not been provided. Furthermore, the water off-setting provider is not a signatory to the UU. Consequently, I have no certainty that the mitigation necessary to avoid the development from having an adverse effect on the integrity of the Arun Valley sites would be secured.
22. The appellant contends the UU meets the tests of the Framework and cites an example of another scheme where water neutrality was secured by a UU to illustrate their point. However, in that case the water off-setting land was shown edged red and appended as a supplementary deed to the UU, which is not the case in the appeal before me. Consequently, it does not alter my findings on the matter.
23. As competent authority, taking the precautionary principle, I therefore find that the development would likely have a significant adverse effect on the integrity of the protected sites and therefore does not accord with the Habitats Regulations. This also runs counter to the expectations of HDPF Policy 31.

### **Other Matters**

24. As a result of the Council being unable to demonstrate a 5YHLS, it published a document 'Facilitating Appropriate Development' in October 2022 (FAD). This alters the way in which HDPF Policy 4 should be applied. The FAD removes the need for a site to be allocated within the HDPF or NP to be considered acceptable in principle. While the FAD retains the need to demonstrate how the proposal will meet local needs, and to comply with the other remaining criteria to Policy 4, I have found above that the proposal would help to address the undersupply of housing identified in the district and would comply with the other criteria, with the exception of adjoining a BUAB, which the appeal site does not do.
25. However, the FAD, alongside the Framework seeks to promote sustainable development in rural areas and prevent isolated homes in the countryside. As the site sits amongst a small cluster of other dwellings, some of which are on the opposite side of the road, it would not be physically isolated in this respect. Outside of the appeal site, on the opposite side of Washington Road, a footpath provides pedestrian access to the heart of the settlement which the appellant indicates is approximately 0.9 miles away, with the edge of the settlement closer.
26. Additionally, my attention has been drawn to several bus stops in the vicinity of the site. In particular, the bus stop said to be 187m to the east is accessible by footpath and is within a reasonable walking distance from the appeal site. Limited

details have been provided on the frequency of buses, albeit it provides public transport to other settlements in the wider area, as expected given its position in the settlement hierarchy. Consequently, occupiers of the site would have a choice of transport that would not rely solely on use of the private car.

27. Developing the site does not risk merging the settlements owing to its highly constrained positioning between dwellings and the designated Sandgate Park site behind. It would make effective use of land that is not of a high environmental value in line with HDPF Policy 2 and perform well against the objectives of maintaining the district's unique character. Moreover, given its relatively close proximity to a range of services and facilities, the material considerations indicate that the location of development is acceptable, notwithstanding the conflict with the development plan.
28. While there are likely to be other areas of previously developed land (PDL) outside of BUAB's, based on the individual merits of the scheme, it is unlikely that another site would display exactly the same circumstances and it would be unlikely to set an unwelcome precedent.
29. In support of the Council's case, three appeal decisions for single dwellings in the countryside have been cited. Unlike the appeal before me, the appeal dismissed at Lancasters Cottage, Partridge Green<sup>2</sup>, would have resulted in a new home isolated from any settlement. The other two appeals had other harms identified which required balancing. All of these decisions were made when the supply of housing deliverable housing exceeds its current position. For these reasons, based on the limited information before me, they are not directly comparable and do not alter my findings on this matter.

## **Planning Balance**

30. The necessary 5YHLS cannot be demonstrated. There is agreement that the Council is currently only able to demonstrate a 1.0 year supply of deliverable housing sites<sup>3</sup>, representing a significant shortfall. An inability to demonstrate a 5YHLS warrants the application of paragraph 11(d) of the Framework. In accordance with paragraph 11(d)(i), I have already established that there is a strong reason for refusal with regards to a habitats site. The presumption in favour of development does not therefore apply.
31. I have found that locationally, the site runs contrary to the spatial strategy of the development plan. However, in circumstances where the Council's housing delivery policies have acted to unduly restrict the supply of homes, I do not find the site's position outside of the settlement boundary, and thus at odds with the Council's spatial strategy, to be decisive to the outcome of this appeal. Rather, when considered in the round, the site is PDL and located where occupants would be able to access local services and facilities and help support them by means other than reliance solely on the private car. This along with the small but important boost in housing supply, and the temporary construction jobs it would create, weighs heavily in favour of the scheme.
32. However, as I have set out, the effect of the development on the integrity of the Arun Valley sites is a strong reason for refusal to which I attach substantial weight.

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<sup>2</sup> Appeal Ref: 3297418 – dismissed March 2023

<sup>3</sup> based on the Housing Delivery Test Action Plan, April 2025

This aligns with the thrust of paragraph 193 of the Framework and brings it into conflict with the development plan as a whole. Although there are weighty material considerations, they would not outweigh the conflict with the development plan.

**Conclusion**

33. For the reasons set out above, the appeal should be dismissed.

*C Walker*

INSPECTOR

## Appendix C – Compass Travel Bus Schedule

## 74: Storrington - West Chiltington - Barns Green - Horsham

### 74A: Storrington - Thakeham - Barns Green - Horsham

### 74B: Storrington - Thakeham - Shipley - Maplehurst - Horsham

includes 64 journeys from Loxwood to Coolham, Barns Green and Horsham

**74**  
**74A**  
**74B**

Operates on days shown

|                                       | <b>M-F</b><br><b>74A</b> | <b>Tue</b><br><b>74</b> | <b>Tue</b><br><b>74</b> | <b>Tue</b><br><b>74</b> | <b>Thu</b><br><b>74B</b> | <b>M Th</b><br><b>64</b> | <b>Thu</b><br><b>74A</b> | <b>Thu</b><br><b>74A</b> |
|---------------------------------------|--------------------------|-------------------------|-------------------------|-------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <b>Storrington</b> , Bus Stand        | 0643                     | 0935                    | 1212                    | 1340                    | 0935                     |                          | 1219                     | 1347                     |
| Thakeham, The Street                  | 0649                     | ▼                       | ▼                       | ▼                       | 0941                     |                          | 1225                     | 1353                     |
| W.Chiltington Common, C'rds           | ▼                        | 0941                    | 1218                    | 1346                    | ▼                        |                          | ▼                        | ▼                        |
| W.Chiltington, Queens Head            | ▼                        | 0944                    | 1221                    | 1349                    | ▼                        |                          | ▼                        | ▼                        |
| Danhill, Crossroads                   | 0651                     | 0950                    | 1227                    | 1355                    | 0943                     |                          | 1227                     | 1355                     |
| Shipley Village                       | ▼                        | ▼                       | ▼                       | ▼                       | 0948                     |                          | ▼                        | ▼                        |
| Buckbarn Crossroads                   | ▼                        | ▼                       | ▼                       | ▼                       | 0953                     |                          | ▼                        | ▼                        |
| Maplehurst, White Horse               | ▼                        | ▼                       | ▼                       | ▼                       | 0959                     |                          | ▼                        | ▼                        |
| Nuthurst, Black Horse                 | ▼                        | ▼                       | ▼                       | ▼                       | 1003                     |                          | ▼                        | ▼                        |
| Coolham, Crossroads                   | 0654                     | 0953                    | 1230                    | 1358                    | ▼                        | 1115                     | 1230                     | 1358                     |
| Brooks Green                          | 0657                     | 0956                    | 1233                    | 1401                    | ▼                        | 1118                     | 1233                     | 1401                     |
| Barns Green, The Hordens              | 0701                     | 1000                    | 1237                    | 1405                    | ▼                        | 1122                     | 1237                     | 1405                     |
| Barns Green, Recreation Grnd          | 0702                     | 1002                    | 1239                    | 1407                    | ▼                        | 1124                     | 1239                     | 1407                     |
| Christ's Hospital, Bluecoat Pond      | 0708                     | 1008                    | 1245                    | 1413                    | ▼                        | 1130                     | 1245                     | 1413                     |
| <b>Horsham</b> , Bus Stn, Bay A (arr) | 0714                     | 1016                    | 1253                    | 1421                    | 1016                     | ▼                        | 1253                     | 1421                     |
| <b>Horsham</b> , Bus Stn, Bay A (dep) |                          | 1020                    | 1255                    | 1425                    | 1020                     | 1138                     |                          |                          |
| Horsham, Carfax                       |                          | 1022                    | 1257                    | 1427                    | 1022                     | 1140                     |                          |                          |

|                                           | <b>Tue</b><br><b>74</b> | <b>Tue</b><br><b>74</b> | <b>Tue</b><br><b>74</b> | <b>Thu</b><br><b>74A</b> | <b>Thu</b><br><b>74B</b> | <b>M Th</b><br><b>64</b> | <b>Thu</b><br><b>74A</b> | <b>Sch</b><br><b>74A</b> | <b>M-F</b><br><b>74A</b> |
|-------------------------------------------|-------------------------|-------------------------|-------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <b>Horsham</b> , Bus Station, Bay A (dep) | 1020                    | 1255                    | 1425                    | 1020                     | 1255                     | 1325                     | 1425                     |                          | 1635                     |
| Horsham, Carfax                           | 1022                    | 1257                    | 1427                    | 1022                     | 1257                     | 1327                     | 1427                     |                          | 1637                     |
| Horsham, Station                          | ▼                       | ▼                       | ▼                       | ▼                        | ▼                        | ▼                        | ▼                        |                          | 1640                     |
| Horsham, Hospital                         | ▼                       | ▼                       | ▼                       | ▼                        | ▼                        | ▼                        | ▼                        |                          | 1641                     |
| Christ's Hospital, Bluecoat Pond          | 1032                    | 1307                    | 1437                    | 1032                     | ▼                        | 1337                     | 1437                     |                          | 1651                     |
| Barns Green, Recreation Ground            | 1038                    | 1313                    | 1443                    | 1038                     | ▼                        | 1341                     | 1443                     |                          | 1657                     |
| Barns Green, The Hordens                  | 1040                    | 1315                    | 1445                    | 1040                     | ▼                        | 1343                     | 1445                     |                          | ▼                        |
| Brooks Green                              | 1044                    | 1319                    | 1449                    | 1044                     | ▼                        | 1346                     | 1449                     |                          | 1703                     |
| Coolham, Crossroads                       | 1047                    | 1322                    | 1452                    | 1047                     | ▼                        | 1350                     | 1452                     |                          | 1706                     |
| Nuthurst, Black Horse                     | ▼                       | ▼                       | ▼                       | ▼                        | 1307                     |                          | ▼                        |                          | ▼                        |
| Maplehurst, White Horse                   | ▼                       | ▼                       | ▼                       | ▼                        | 1311                     |                          | ▼                        |                          | ▼                        |
| Buckbarn Crossroads                       | ▼                       | ▼                       | ▼                       | ▼                        | 1317                     |                          | ▼                        |                          | ▼                        |
| Shipley Village                           | ▼                       | ▼                       | ▼                       | ▼                        | 1322                     |                          | ▼                        |                          | ▼                        |
| Danhill, Crossroads                       | 1050                    | 1325                    | 1455                    | 1050                     | 1327                     |                          | 1455                     |                          | 1709                     |
| W.Chiltington, Queens Head                | 1056                    | 1331                    | 1501                    | ▼                        | ▼                        |                          | ▼                        |                          | ▼                        |
| W.Chiltington Common, Crossroads          | 1059                    | 1334                    | 1504                    | ▼                        | ▼                        |                          | ▼                        |                          | ▼                        |
| Thakeham, The Street                      | ▼                       | ▼                       | ▼                       | 1052                     | 1329                     |                          | 1457                     |                          | 1711                     |
| Thakeham, SGS Rock Rd, Grounds            | ▼                       | ▼                       | ▼                       | ▼                        | ▼                        |                          | ▼                        | 1520C                    | ▼                        |
| <b>Storrington</b> , Bus Stand            | 1105                    | 1340                    | 1510                    | 1058                     | 1335                     |                          | 1503                     | 1530                     | 1717                     |
| Rackham Street                            |                         |                         |                         |                          |                          |                          |                          | 1538                     |                          |
| Amberley Square                           |                         |                         |                         |                          |                          |                          |                          | 1542R                    |                          |
| Amberley Station                          |                         |                         |                         |                          |                          |                          |                          | 1546R                    |                          |
| Houghton, Houghton Lane                   |                         |                         |                         |                          |                          |                          |                          | 1548R                    |                          |

**C** - Operates via Thakeham, Furze Common Road. This section to Thakeham carries school pupils only and not the public

**M-F** - Operates Mondays to Fridays

**Mon** - Operates Mondays only

**Tue** - Operates Tuesdays only

**Thu** - Operates Thursdays only

**M Th** - Operates Monday and Thursday only

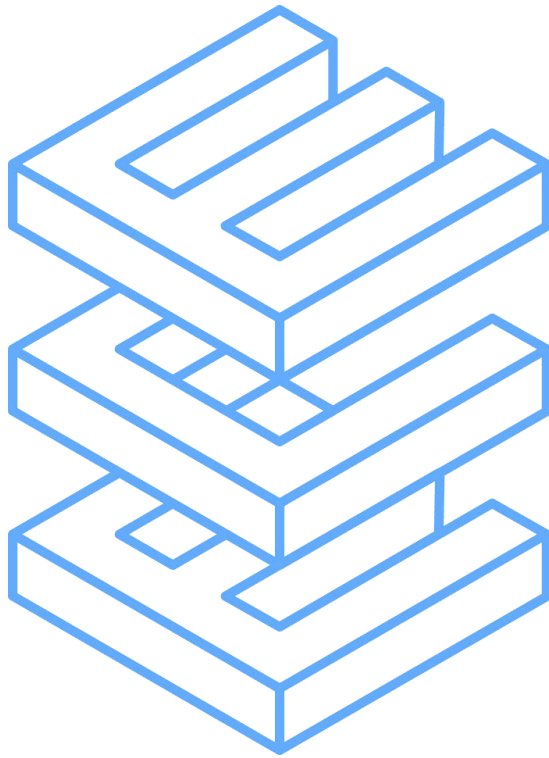
**Sch** - Operates schooldays only

**R** - Request for passengers already onboard



**Compass**travel

your local bus company

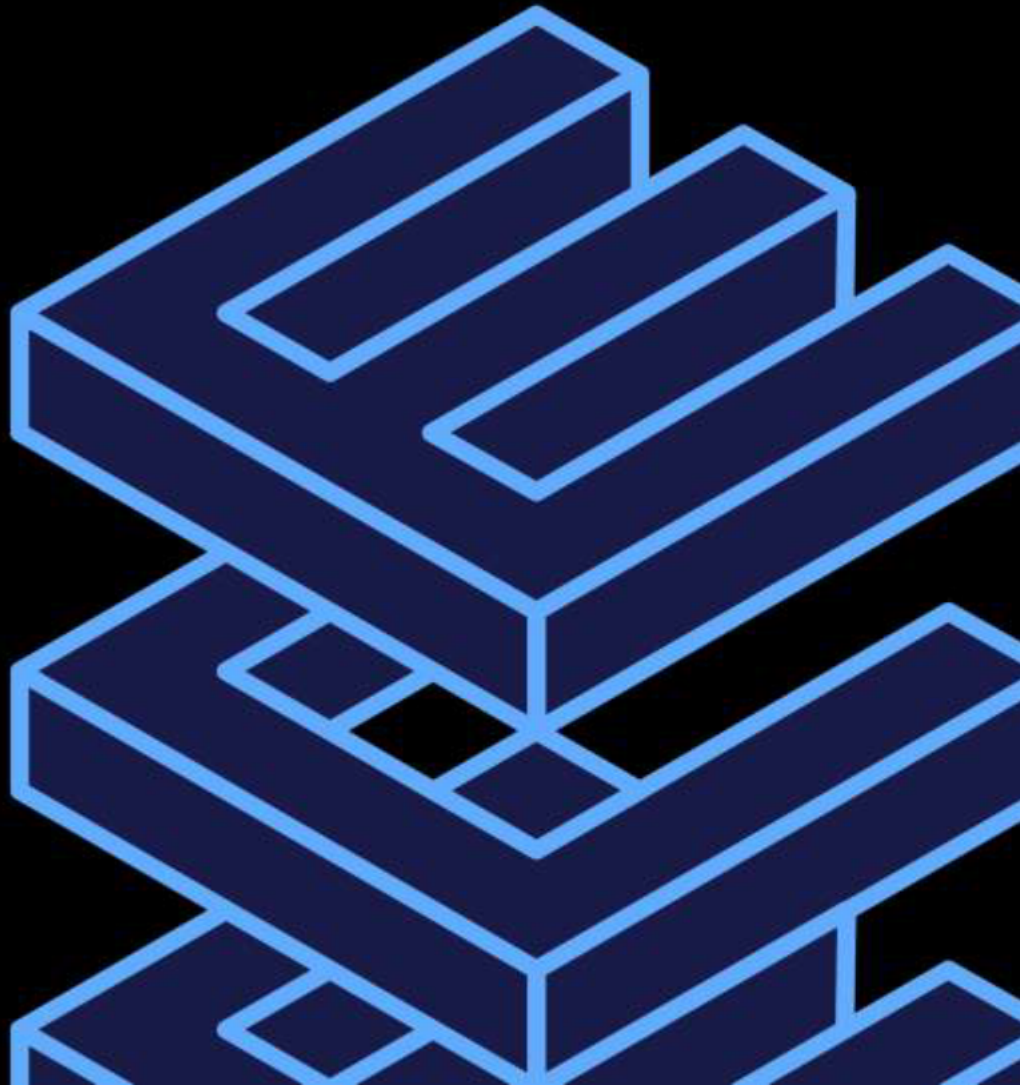


# Appendix B – Statement of Case dated April 2026

# Statement of Case

Land adjoining No. 2 and  
No. 3 Townhouse  
Cottages, Thakeham

April 2026



ECE Planning  
64 – 68 Brighton Road, Worthing  
West Sussex, BN11 2EN

[www.eceplanning.com](http://www.eceplanning.com)

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01903 248777

Project Name: Townhouse, Thakeham

Location Land adjoining No. 2 and No. 3 Townhouse  
Cottages, Townhouse Farm, Coolham Road,  
Thakeham, RH20 3EW

Client: Fowlers Land and New Homes

File Reference: P2176i

| Issue | Date       | Author | Checked  | Notes          |
|-------|------------|--------|----------|----------------|
| PL1   | 18.03.2026 | R Hoad | C Barker | Initial Draft  |
| PL2   | 31.03.2026 | R Hoad | C Barker | Client Issue   |
| PL3   | 07.04.2026 | R Hoad | R Hoad   | Planning Issue |
|       |            |        |          |                |
|       |            |        |          |                |
|       |            |        |          |                |

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# 1. Introduction

- 1.1. This Statement of Case is submitted on behalf of **Fowlers Land and New Homes** in support of an appeal against Horsham District Council's refusal of Full Planning Permission dated 12 March 2026.
- 1.2. The application sought full planning permission for the demolition of an existing storage structure and the erection of two detached dwellings with associated private gardens, parking and landscaping. The application reference was DC/25/1909.
- 1.3. The application was refused for a single reason relating solely to the principle of development in a countryside location outside the defined Built-Up Area Boundary (BUAB) as set out in full below:

*"The proposed development would be sited within an unsustainable location in the countryside, outside of a defined built-up area boundary, and on a site not allocated for housing development within the Horsham District Planning Framework, or a made Neighbourhood Plan. Notwithstanding the absence of a five-year land housing supply, and the provisions of the National Planning Policy Framework (2024) at paragraph 11(d), it is not considered that there are any material considerations in this instance which would outweigh harm arising from conflict with Policies 1, 2, 3, 4, and 26 of the Horsham District Planning Framework (2015)."*

- 1.4. It is our view that the Council failed to consider the conclusions of the Planning, Energy and Sustainability Statement which was submitted in support of the application, and which concluded that the benefits of the proposal clearly outweigh any limited harm arising from its location outside the Built-Up Area Boundary. To clarify, the clear and demonstrate benefits include:
  - The removal of an unattractive and redundant storage structure of no architectural or heritage merit;
  - The efficient and sensitive redevelopment of underused land in a sustainable and accessible location;
  - The provision of two high-quality, family-sized homes that will make a modest but valuable contribution to local housing supply;
  - A design and layout that responds positively to the site's semi-rural context, respecting the established pattern of development and enhancing local character;
  - Clear infill development which is enclosed on all boundaries by residential development with no encroachment in to the countryside; and
  - New landscaping and biodiversity enhancements that will deliver ecological net benefits and reinforce the site's green, rural character.
- 1.5. In addition, the development represents a logical and proportionate form of small scale growth that aligns with the aims of the NPPF to significantly boost the supply of homes, make efficient use of land, and deliver well-designed, sustainable places.
- 1.6. No technical objections were raised by consultees. Highways, Ecology, Drainage and Arboriculture were all found acceptable. The refusal rests exclusively on spatial policy conflict and an asserted lack of sustainability. The appeal therefore turns on:

- The correct application of paragraph 11(d) of the NPPF (the tilted balance);
- The weight to be given to out-of-date housing supply policies;
- Whether the site represents a sustainable and suitable location for modest residential development; and
- Whether the benefits significantly and demonstrably outweigh any limited policy conflict.

- 1.7. For the reasons set out below, the Appellant submits that the Council has misapplied national policy and failed to properly balance material considerations. The proposal constitutes sustainable development and planning permission should be granted.
- 1.8. In accordance with the Government's Updated Guidance in relation to 'Use of artificial intelligence in casework evidence' dated 20 February 2026, it is confirmed that this Statement has used AI (ChatGPT) to review language structure. The Statement has been thoroughly checked prior to submission, to ensure that the content is accurate and has not been amended by AI.

## 2. The Appeal Site

- 2.1. As set out in detail within the Planning, Energy and Sustainability Statement which was submitted in support of the application, the appeal site lies to the west of Coolham Road within the cluster of development known as Townhouse Farm, Thakeham.
- 2.2. To summarise, the site is:
- Enclosed by residential development to the north, south and west;
  - Physically contained within a defined cluster of existing residential dwellings;
  - Approximately 200 metres from the defined BUAB of Thakeham;
  - Benefits from established footpaths from the site to the existing services and facilities in Thakeham;
  - Located within Flood Zone 1;
  - Free from landscape, heritage or ecological designations.
- 2.3. The site currently contains a container unit which stores agricultural equipment in association with the wider land at Townhouse Farm. The remainder of the land to the east is privately owned but is currently licensed to a neighbouring dwelling (No. 2 Townhouse Cottages) for use as additional residential garden.
- 2.4. In visual and spatial terms, the site reads as a logical infill opportunity within an established group of dwellings rather than isolated countryside development.
- 2.5. Please refer to the Planning, Energy and Sustainability Statement for full details of the site.

## 3. Relevant Planning History

### 3.1. Introduction

3.1.1. As set out in detail within the Planning, Energy and Sustainability Statement which was submitted in support of the application, there is extensive planning history pertaining to the site and immediate surroundings within the wider Townhouse Farm. As set out, residential development has been established at Townhouse Farm via the following applications:

- DC/20/1711 – Demolition of storage buildings and erection of two dwellings (approved)
- DC/19/0685 – Prior Approval for change of use to residential (approved)
- DC/14/1652 – Change of use of farm office to dwelling (approved)

3.1.2. The principle of residential use in this immediate cluster is therefore well established.

3.1.3. This Section seeks to elaborate on the Planning History as set out in the Planning, Energy and Sustainability Statement.

### 3.2. Pre-Application Engagement and Planning Application

3.2.1. As set out in the original Planning Statement and support email correspondence, the Appellant engaged in formal pre-application discussions under reference PE/24/0227.

3.2.2. At the pre-application meeting, officers indicated verbally via Teams that the site could be viewed as infill within a built cluster and that an application should be submitted promptly.

3.2.3. However, the subsequent written pre-application response adopted a materially more negative position.

3.2.4. The Appellant raised concerns regarding this inconsistency with senior officers. No clarification was provided beyond confirmation that the written response stood.

3.2.5. Notwithstanding this, the Appellant sought to address the written response received in the following ways, prior to submitting a formal application:

- Reduced the scheme from 3 dwellings to 2;
- Addressed landscape concerns;
- Provided detailed ecological, arboricultural and drainage reports;
- Demonstrated the site's 'previously developed land' status;
- Provided extensive sustainability evidence.

3.2.6. The formal full planning application was validated on 20 November 2025 but no substantive correspondence was received from the Council until 29 January 2026; over 10 weeks later and after the statutory determination period had nearly expired.

3.2.7. On 16 February 2026 the Appellant was informed that NatureSpace had not been consulted, despite the site being within an Impact Risk Zone. This delay was particularly concerning to the Appellant and numerous emails were sent to the LPA, as demonstrated in the email correspondence. Unfortunately, no satisfactory responses were received from the LPA as to why there was such a delay with determining the application and why the application was refused. The Appellant therefore considers that the statutory requirement to act positively and proactively has not been met.

## 4. The Appeal Scheme

4.1. The appeal proposal is set out in detail in the Planning, Energy and Sustainability Statement which supported the original application. In summary, the proposal seeks:

- Demolition of an existing storage unit;
- Erection of two detached 3-bed dwellings (123sqm each) which would comply and exceed with Nationally Described Space Standards;
- Dwellings designed to achieve the optional M4(2) standard of Part M of the Building Regulations;
- A car port for each dwelling and policy-compliant parking;
- Private rear gardens;
- Biodiversity enhancements;
- Replacement tree planting where possible and retention of existing hedgerow where possible;
- Sustainable drainage features (SuDS) comprising composite permeable paving in the parking areas and geocellular soakaways in the rear gardens;
- EV charging provision.

4.2. As set out within Section 3 of this Statement, the scheme was specifically amended from the pre-application iteration to address officer concerns regarding layout and density. All technical consultees raised no objection.

4.3. The proposed layout can be seen below:



Figure 1 - Proposed Site Plan

## 5. Policy Overview

- 5.1. A Planning Policy overview is provided in detail in the accompanying Planning, Energy and Sustainability Statement which was submitted in support of the application.
- 5.2. Whilst this Statement does not seek to repeat this, it is worth reiterating that the Development Plan comprises the Horsham District Planning Framework (2015) and the Thakeham Neighbourhood Plan (2017) **which are both are over five years old.**
- 5.3. In addition, it is noted that the reason for refusal makes specific reference to the following policies:
  - National Planning Policy Framework (2024) - Paragraph 11(d)
  - Policies 1, 2, 3, 4, and 26 of the Horsham District Planning Framework (2015)
- 5.4. The above National and Local planning policies are considered in greater detail within the following section of this Statement.

## 6. Response to Reason for Refusal

### 6.1. Introduction

- 6.1.1. As set out in the beginning of this Statement, the application at Townhouse Cottages in Thakeham (reference DC/25/1909) was refused for a single reason relating solely to the principle of development in a countryside location outside the defined Built-Up Area Boundary (BUAB) as set out in full below:

***“The proposed development would be sited within an unsustainable location in the countryside, outside of a defined built-up area boundary, and on a site not allocated for housing development within the Horsham District Planning Framework, or a made Neighbourhood Plan. Notwithstanding the absence of a five-year land housing supply, and the provisions of the National Planning Policy Framework (2024) at paragraph 11(d), it is not considered that there are any material considerations in this instance which would outweigh harm arising from conflict with Policies 1, 2, 3, 4, and 26 of the Horsham District Planning Framework (2015).”***

- 6.1.2. The Appellant respectfully submits that this conclusion results from a misapplication of national policy and an incorrect assessment of sustainability. As such, this Section seeks to address the Reason for Refusal in full by breaking it down in to separate sections. Please see below.

### 6.2. Spatial Policy Conflict in Context

- 6.2.1. The proposed development seeks full planning permission for the demolition of the existing storage unit and the erection of 2no. detached dwellings together with associated private gardens, parking, and landscaping. The existing building is a utilitarian storage structure of no architectural or heritage merit and its removal would provide an opportunity to make more efficient use of the land.
- 6.2.2. The site is located on land west of Coolham Road, which currently forms part of Townhouse Farm and includes land temporarily licensed to No. 2 Townhouse Cottages for use as additional garden space. The site is situated outside the defined Built-Up Area Boundary (BUAB) of Thakeham and is therefore designated as countryside for planning policy purposes.
- 6.2.3. It is not disputed that the site lies outside the defined Built-Up Area Boundary. However, that fact alone cannot be determinative in circumstances where the Council accepts that it can demonstrate only a 1-year housing land supply.
- 6.2.4. The Officer’s Report correctly acknowledges that Policies 2, 4, 15 and 26 of the HDPF are out-of-date. In such circumstances, paragraph 11(d) of the NPPF is engaged and planning permission should be granted unless the adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the Framework as a whole.
- 6.2.5. The refusal reason, however, effectively elevates spatial policy conflict to a decisive position without properly undertaking the tilted balance exercise.
- 6.2.6. The appeal site is not an isolated incursion into open countryside. It is physically contained and visually read as part of the established Townhouse Farm cluster which comprises circa 10no. existing homes. Development lies immediately to the north, south and west. The site does not project into open agricultural land nor does it extend the built form in a manner that would result in sprawl or coalescence. Indeed, the Officer’s Report acknowledges that the site sits within a defensible boundary and is enclosed by existing vegetation.

- 6.2.7. The proposed development clearly represents infill development which is supported by existing and proposed planning policy. For example, the emerging National Planning Policy Framework, under S5: Principle of development outside settlements, is of direct relevance. This section confirms that:

*"Only certain forms of development should be approved outside settlements, as set out in the following list. 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 this Framework."*

- 6.2.8. Criterion (e) expressly includes "limited infilling within groups of houses" which this application clearly represents.
- 6.2.9. In these circumstances, the degree of conflict with the spatial strategy is limited and technical rather than substantive in character. It arises from the administrative position of the settlement boundary rather than from demonstrable environmental or locational harm.
- 6.2.10. The Planning Inspector in the recent Abbots Leigh decision (APP/Z3825/W/25/3363148) confirmed that a site's position outside a settlement boundary is not decisive where housing policies are out-of-date. In that case, despite clear policy conflict, the Inspector found the location acceptable when considered against the Framework as a whole and afforded substantial weight to housing delivery in the context of Horsham's severe shortfall. The only reason that the appeal was dismissed was the failure to secure water neutrality mitigation - a matter that does not arise here as water neutrality has now fallen away. As such, the application at Abbots Leigh was resubmitted and has now been approved under reference DC/25/1831. Refer to Appendix A for the Officers Report.
- 6.2.11. The same reasoning applied for APP/Z3825/W/25/3363148, applies in this appeal and it is respectfully requested that the Inspector allows the Appeal on the basis that the site is located in a suitable and logical location.

### 6.3. Sustainability and Accessibility

- 6.3.1. The refusal asserts that the site is in an "unsustainable location" and that future occupiers would likely be reliant upon private vehicles. The following paragraph is noted from the Officers Report:

*"The application site is located on Coolham Road, which is not lit and does not benefit from a dedicated pedestrian footway. While it is recognised that public right of way footpath 2376 is located immediately to the east of the site (on the opposite side of Coolham Road) which then adjoin footpath 2475 to The Street, Thakeham, this is not considered to be a viable or attractive route as it remains unlit and poorly surveilled. In this context, it is likely that future occupiers would be reliant on private vehicles to access everyday services, amenities and facilities. Thakeham itself is defined as a "Smaller Village" under Policy 3 of the HDPF, where these villages have limited services, facilities, social networks, but do have good accessibility to larger settlements or settlements with some employment but limited services, facilities, or accessibility. Residents of Smaller Villages are reliant on larger settlements to access most of their requirements. The future occupiers would therefore be reliant upon the amenities, services and facilities of other settlements, which has the potential to further increase reliance on private vehicles."*

- 6.3.2. With respect, this conclusion does not reflect the evidence submitted with the application nor the site's actual connectivity. The Planning Statement included detailed mapping and photographic evidence demonstrating direct access from the site to Public Footpath 2474 which comprises an attractive and viable route. To clarify, the route is hard-surfaced along its entire length and connects eastwards to Storrington Road (B2139), emerging adjacent to a formal pedestrian crossing serving the Abingworth Fields development. That development includes community facilities, a café/store, village hall, recreation areas and open space.

The route avoids the need to walk along Coolham Road carriageway and provides a continuous pedestrian link into the heart of the village. We would strongly encourage the Inspector to walk this route when carrying out a site visit, to fully appreciate that it is an attractive and viable route.

- 6.3.3. In addition, bus stops are located within walking distance and are accessible without walking along an unlit rural road. The submitted bus timetable confirms regular services connecting to Storrington, Horsham and surrounding settlements.
- 6.3.4. The Highway Authority raised no objection and did not identify sustainability concerns. It is notable that the Council's case on sustainability was not supported by technical highway evidence.
- 6.3.5. It should be noted that the National Planning Policy Framework does not require rural sites to replicate the accessibility characteristics of town centre locations. Paragraph 83 of the NPPF recognises that housing in rural areas can support the vitality of rural communities. The test is whether future residents have realistic opportunities to access services by means other than the private car. In this case, such opportunities clearly exist.
- 6.3.6. The Officer's Report appears to place weight on the absence of street lighting along Coolham Road. However, many rural villages within Horsham District are characterised by unlit roads and this does not render them inherently unsustainable. There are many precedents of this and it is considered that the LPAs judgement in this instance is not consistent with other developments in the District; for example, Appendix A sets out the Officers Report for a recently approved application in Storrington, after an Inspector found the location to be acceptable. This precedent in Storrington is located outside of the built up area and is not served by a lit access in to the nearest settlement.
- 6.3.7. It is therefore clear that the key question is regarding connectivity and proximity to services, not the presence of urban infrastructure. As set out, the site is connected to the nearest settlement via an attractive and viable existing route, comprising hardstanding, and is entirely appropriate for bikes, pushchairs and wheelchairs.
- 6.3.8. When assessed against the Framework's sustainability objectives (economic, social and environmental) the site performs well. It is physically related to existing development, benefits from pedestrian links and public transport, and would contribute to local housing supply in a district experiencing acute undersupply. Applications for residential redevelopment have previously been approved in Townhouse Farm (as summarised in Section 3) and therefore the site is clearly suitable for residential redevelopment. It is therefore respectfully requested that the Inspector allows this Appeal on this basis.

## 6.4. Weight to Housing Delivery

- 6.4.1. As set out in the Reason for Refusal, the Council accepts that it can demonstrate only a 1-year housing land supply. This represents a substantial, significant and concerning shortfall. One which should not be taken lightly.
- 6.4.2. Paragraph 61 of the NPPF requires planning authorities to significantly boost the supply of homes. As set out in the original Planning Statement, the Government has recently increased the national housing target from 300,000 to 370,000 new homes per year, with higher growth directed towards areas experiencing the greatest affordability pressures and development capacity. Horsham, as part of the wider Gatwick Diamond area with strong market demand and high affordability constraints, is likely to fall within this higher-growth category.
- 6.4.3. In circumstances of such a severe deficit, even modest schemes attract meaningful weight. The Officer's Report describes the benefit of two dwellings as "moderate". With respect, that understates the importance of additional housing delivery where supply is so constrained. The Planning Inspector in Abbots Leigh attached "substantial weight" to the provision of a

single dwelling in the same district context. There is no reasoned basis for attributing lesser weight here.

- 6.4.4. Furthermore, small sites are expressly recognised in national policy as making an important contribution to housing delivery and supply diversification, as noted under paragraph 73 of the NPPF:

*“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, are essential for Small and Medium Enterprise housebuilders to deliver new homes, and are often built-out relatively quickly.”*

- 6.4.5. The appeal proposal would deliver two family-sized homes in a sustainable rural location without reliance on major infrastructure. The delivery of two additional dwellings on underused land in this location would therefore directly support national objectives for increasing housing supply and should be recognised as an important contribution to the District’s severe housing need.

## 6.5. Absence of Identified Harm

- 6.5.1. The planning assessment confirms that the proposal gives rise to no unacceptable harm in technical or environmental terms. The Council concluded that:

- The design, scale and appearance are appropriate.
- There would be no unacceptable impact on neighbouring amenity.
- Highways impacts are acceptable.
- Ecological mitigation is satisfactory.
- Drainage is acceptable.
- Biodiversity Net Gain can be secured.
- No heritage or landscape harm arises.

- 6.5.2. The sole identified harm is conflict with spatial policies arising from the site’s position outside the defined boundary.

- 6.5.3. Where housing policies are out-of-date, such conflict must be weighed rather than treated as determinative. The Framework requires a balanced exercise, not a re-application of restrictive countryside policies in isolation.

- 6.5.4. In this case, there is no demonstrable environmental harm, no infrastructure harm, no safety harm and no character harm. The asserted “unsustainability” is not supported by evidence and does not amount to a significant or demonstrable adverse impact.

## 6.6. Application of the Tilted Balance

- 6.6.1. When paragraph 11(d) of the NPPF is correctly applied, the question is whether the adverse impacts would significantly and demonstrably outweigh the benefits. As set out in Section 1 of this Statement and set out in the original Planning Statement, the benefits associated with the proposed development include:

- The removal of an unattractive and redundant storage structure of no architectural or heritage merit;
- The efficient and sensitive redevelopment of underused land in a sustainable and accessible location;
- The provision of two high-quality, family-sized homes that will make a modest but valuable contribution to local housing supply;

- A design and layout that responds positively to the site's semi-rural context, respecting the established pattern of development and enhancing local character;
- Clear infill development which is enclosed on all boundaries by residential development with no encroachment in to the countryside; and
- New landscaping and biodiversity enhancements that will deliver ecological net benefits and reinforce the site's green, rural character.

6.6.2. In addition to the above, the proposals would result in economic activity through construction.

6.6.3. The adverse impact identified by HDC is limited to spatial policy conflict, in circumstances where those policies are acknowledged to be out-of-date. In the Appellant's submission, that conflict does not approach the threshold of "significant and demonstrable" harm required to displace the presumption in favour of sustainable development.

6.6.4. The Council's refusal effectively re-applies restrictive countryside policies as if the housing land supply position were compliant. That approach is inconsistent with paragraph 11(d) of the NPPF and recent appeal decisions within the district. The actual location of the site is not fully acknowledged within the LPAs assessment, as it clearly demonstrates a logical development site for two additional new homes.

6.6.5. Importantly and as set out in the email correspondence, the Council's own pre-application response acknowledged that, notwithstanding conflict with Policy 26 of the HDPPF, the application would be assessed in light of the tilted balance and concluded that:

*"Whilst the principle of development would be unacceptable with regards to Policy 26 of the HDPPF, the Council's housing shortage is noted and the application would be decided in light of the tilted balance. It is further acknowledged that the context of the site would be an infill in built form and viewed within the context of a cluster of existing built form where the land may be seen as previously developed land."*

6.6.6. The pre-application advice went on to identify two specific matters which, if addressed, could allow the proposal to be viewed more favourably:

- Demonstration that the land is previously developed; and
- Removal of one dwelling to address concerns regarding layout and perceived cramming.

6.6.7. Both matters have now been fully addressed. The submitted Planning Statement clearly demonstrates that the site constitutes previously developed land, and the scheme has been revised to remove one dwelling in direct response to officer advice. The current proposal therefore aligns squarely with the conclusions reached at pre-application stage.

## 6.7. Conclusion on the Reason for Refusal

6.7.1. The Council's refusal is founded solely on conflict with spatial policies that are expressly acknowledged to be out-of-date in the context of a 1-year housing land supply. In these circumstances, paragraph 11(d) of the NPPF is engaged and permission must be granted unless adverse impacts would significantly and demonstrably outweigh the benefits.

6.7.2. No such adverse impacts have been identified. The Council raises no objection in respect of design, character, landscape, highways, ecology, drainage, neighbour amenity or heritage. Technical consultees raise no concerns. There is no identified environmental, infrastructure or safety harm. The only issue is the site's position beyond the BUAB.

- 6.7.3. Settlement boundary conflict, in isolation, does not amount to significant and demonstrable harm - particularly where housing policies are out-of-date and the authority faces an acute housing shortfall. The Council has effectively treated policy conflict as determinative, thereby misapplying the tilted balance and frustrating the presumption in favour of sustainable development.
- 6.7.4. The benefits are clear and carry substantial weight: the delivery of two family dwellings in an authority with a severe housing deficit; the efficient redevelopment of underused land; visual improvement through removal of a poor-quality structure; economic benefits; and biodiversity enhancements. These are tangible, policy-compliant benefits which directly support national objectives to boost housing supply.
- 6.7.5. Properly assessed, there are no adverse impacts capable of significantly and demonstrably outweighing these benefits. The refusal therefore fails to accord with the Framework as a whole.
- 6.7.6. The Appellant respectfully submits that the presumption in favour of sustainable development applies and that the appeal should be allowed.

## 7. Conclusions

- 7.1. This appeal relates to a modest proposal for the erection of two high-quality detached dwellings on land that is physically contained within the established Townhouse Farm cluster at Thakeham, representing infill development. The proposal would result in the removal of an unattractive and redundant storage structure and the efficient redevelopment of underused land in a sustainable and accessible location.
- 7.2. The sole reason for refusal relates to the principle of development outside the defined Built-Up Area Boundary. However, it is common ground that Horsham District Council can demonstrate only a one-year housing land supply. In these circumstances, the relevant housing policies are out-of-date and paragraph 11(d) of the National Planning Policy Framework is engaged.
- 7.3. The appeal proposal gives rise to no unacceptable technical, environmental, landscape, heritage, highways, drainage or ecological harm. No statutory consultees raised objections. The Council's case rests solely on spatial policy conflict and an asserted lack of sustainability.
- 7.4. The site is not isolated countryside but a contained and logical infill opportunity within an established group of dwellings which is supported by current and emerging planning policy, in particular, S5 of the emerging NPPF (Principle of development outside settlements). It benefits from safe and viable pedestrian links to the village, access to public transport, and proximity to services and facilities. The evidence demonstrates that future occupiers would have realistic opportunities to travel by means other than the private car.
- 7.5. The adverse impact identified by the Council is limited to conflict with settlement boundary policies which are acknowledged to be out-of-date. That conflict is technical in nature and does not result in any tangible environmental harm. It does not amount to significant and demonstrable harm when assessed against the Framework as a whole.
- 7.6. The benefits of the proposal are clear and substantial in the current district context and include:
- A meaningful contribution to housing supply in an authority with a severe shortfall;
  - Delivery of two family-sized homes built to high accessibility and sustainability standards;
  - Enhancement of the site through removal of a utilitarian structure;
  - Biodiversity net gains and strengthened landscaping;
  - Economic benefits arising from construction activity; and
  - Support for the vitality of the local rural community.
- 7.7. When the tilted balance is correctly applied, these benefits significantly and demonstrably outweigh the limited policy conflict identified. The proposal therefore represents sustainable development for which there is a presumption in favour of approval.
- 7.8. For all of the reasons set out within this Statement of Case and the accompanying Planning, Energy and Sustainability Statement, the Appellant respectfully requests that the Inspector allows the appeal and grants planning permission.

## Appendix A – Abbots Leigh Approved Officers Report (Reference DC/25/1831)



# **PLANNING COMMITTEE REPORT**

**TO:** Planning Committee

**BY:** Head of Development and Building Control

**DATE:** 17 March 2026

**DEVELOPMENT:** Outline Planning Application with all matters reserved apart from access for 1no. 4-bedroom dwelling with associated private garden space, car parking and landscaping.

**SITE:** Abbots Leigh Washington Road Storrington West Sussex RH20 4AF

**WARD:** Storrington and Washington

**APPLICATION:** DC/25/1831

**APPLICANT:** **Name:** Mr David King **Address:** C/O ECE Planning 64-68 Brighton Road Worthing BN11 2EN

**REASON FOR INCLUSION ON THE AGENDA:** Departure from the Development Plan

**RECOMMENDATION:** To approve planning permission subject to appropriate conditions

## **1. THE PURPOSE OF THIS REPORT**

1.1 To consider the planning application.

### DESCRIPTION OF THE SITE

1.2 The application site is located within the residential curtilage of 'Abbots Leigh' on the Washington Road. The site is situated around 430 metres outside of the designated Built-Up -Area Boundary of Storrington, bordered on the east and west side by residential dwellings, on the south by the Washington Road and to the north by Sandgate Park Quarry/ Country Park.

### DESCRIPTION OF THE APPLICATION

1.3 This application seeks outline planning permission with all matters reserved apart from access for 1no. 4-bedroom dwelling with associated private garden space, car parking and landscaping. The application is a resubmission of DC/24/1965 which was dismissed at Appeal on 06/10/2025.

## **2. INTRODUCTION**

### **STATUTORY BACKGROUND**

- 2.1 The Town and Country Planning Act 1990.

### **RELEVANT PLANNING POLICIES**

- 2.2 The following Policies are considered to be relevant to the assessment of this application:

#### **National Planning Policy Framework:**

##### **Horsham District Planning Framework (2015):**

Policy 1 - Strategic Policy: Sustainable Development  
Policy 2 - Strategic Policy: Strategic Development  
Policy 3 - Strategic Policy: Development Hierarchy  
Policy 4 - Strategic Policy: Settlement Expansion  
Policy 15 - Strategic Policy: Housing Provision  
Policy 16 - Strategic Policy: Meeting Local Housing Needs  
Policy 24 - Strategic Policy: Environmental Protection  
Policy 25 - Strategic Policy: The Natural Environment and Landscape Character  
Policy 26 - Strategic Policy: Countryside Protection  
Policy 27 - Settlement Coalescence  
Policy 30 - Protected Landscapes  
Policy 31 - Green Infrastructure and Biodiversity  
Policy 32 - Strategic Policy: The Quality of New Development  
Policy 33 - Development Principles  
Policy 35 - Strategic Policy: Climate Change  
Policy 36 - Strategic Policy: Appropriate Energy Use  
Policy 37 - Sustainable Construction  
Policy 39 - Strategic Policy: Infrastructure Provision  
Policy 40 - Sustainable Transport  
Policy 41 - Parking

##### **Storrington, Sullington and Washington Neighbourhood Plan (2018-2031):**

Policy 1 – A Spatial Plan for the Parishes  
Policy 8 – Countryside Protection  
Policy 14 – Design  
Policy 15 – Green Infrastructure & Biodiversity  
Policy 17 – Traffic & Transport  
Policy 18 – Car Parking

Paragraph 33 of the NPPF requires that all development plans complete their reviews no later than 5 years from their adoption. Horsham District Council is currently in the process of reviewing its development plan however at this stage the emerging policies carry only limited weight in decision making. As the HDPF is now over 5 years old, the most important policies for the determination of this application must be considered as to whether they are 'out of date' (NPPF paragraph 11d). This includes, for applications involving the provision of housing, whether the Council can demonstrate a five year supply of deliverable housing sites (NPPF footnote 8).

The Council is currently unable to demonstrate a five year supply of deliverable housing sites, with the supply currently calculated as being 1 year. The presumption in favour of development within Paragraph 11d) of the NPPF therefore applies in the consideration of all applications for housing development within the District (unless footnote 7 or Paragraph 14 applies to relevant applications), with Policies 2, 4, 15 and 26 now carrying only moderate weight in decision making.

All other policies within the HDPF as itemised above have been assessed against the NPPF and are considered to be consistent such that they continue to attract significant weight in decision making.

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

Strategic Policy 1: Sustainable Development  
 Strategic Policy 2: Development Hierarchy  
 Strategic Policy 3: Settlement Expansion  
 Strategic Policy 6: Climate Change  
 Strategic Policy 7: Appropriate Energy Use  
 Strategic Policy 8: Sustainable Design and Construction  
 Strategic Policy 9: Water Neutrality  
 Strategic Policy 10: Flooding  
 Strategic Policy 11: Environmental Protection  
 Strategic Policy 13: The Natural Environment and Landscape Character  
 Strategic Policy 14: Countryside Protection  
 Strategic Policy 15: Settlement Coalescence  
 Strategic Policy 16: protected Landscapes  
 Strategic Policy 17: Green Infrastructure and Biodiversity  
 Strategic Policy 19: Development Quality  
 Strategic Policy 20: Development Principles  
 Strategic Policy 23: Infrastructure Provision  
 Strategic Policy 24: Sustainable Transport  
 Policy 25: Parking  
 Strategic Policy 37: Housing Provision  
 Strategic Policy 38: Meeting Local Housing Needs  
 Policy 40: Improving Housing Standards in the District

**Planning Advice Notes:**

Facilitating Appropriate Development  
 Biodiversity and Green Infrastructure

**2.3 PLANNING HISTORY AND RELEVANT APPLICATIONS**

|            |                                                                                                                                                                      |                                                                         |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| DC/24/1965 | Outline Application for the erection of 1No. dwelling with associated private garden space, car parking and landscaping with all matters reserved apart from access. | Application Refused on 11.02.2025<br><br>Appeal Dismissed on 06/10/2025 |
| DC/05/1614 | Conversion of barn to provide one residential dwelling                                                                                                               | Application Permitted on 27.01.2006                                     |
| DC/04/0951 | Conversion and extension of barn to provide one dwelling                                                                                                             | Application Refused on 06.07.2004                                       |

**3. OUTCOME OF CONSULTATIONS**

- 3.1 Where consultation responses and representations have been summarised, it should be noted that Officers have had consideration of the full comments received, which are available to view on the public file at [www.horsham.gov.uk](http://www.horsham.gov.uk).

If you are viewing online the specific application link is  
[https://iawpa.horsham.gov.uk/PublicAccess\\_LIVE/SearchResult/RunThirdPartySearch?FileSystemId=DH&FOLDER1\\_REF=DC/25/1831](https://iawpa.horsham.gov.uk/PublicAccess_LIVE/SearchResult/RunThirdPartySearch?FileSystemId=DH&FOLDER1_REF=DC/25/1831)

## INTERNAL CONSULTATIONS

- 3.2 **HDC Arboricultural Officer:** Comment:-
- 3.3 The submitted Arboricultural Impact Assessment (AIA), Preliminary Arboricultural Methods Statement (PAMS) and Tree Protection Plan (TPP) are a fair assessment of the tree stock at the site, in terms of form and condition, and of the potential impacts of the development proposals on trees. (Please see former Arb respond for DC/24/1965).
- 3.4 The scheme meets BS5837:2012 requirements, maintains tree viability, stays within the 20% RPA encroachment threshold and provides justification for the access route, addressing concerns raised in the original holding objection to DC/24/1965. Conditions recommended concerning driveway construction and tree protection measures.
- 3.5 **HDC Environmental Health:** Comment, as this is an outline applications conditions would be recommended.

## OUTSIDE AGENCIES

- 3.6 **NatureSpace (Great Crested Newts):** Comment: -
- 3.7 The Applicant is advised to provide an updated walkover to confirm that habitats are the same as previously assessed by an ecological report carried out in 2024. If it is confirmed that habitats remain the same, then if the application looks to be approved then Provision of a precautionary working statement in the form of Reasonable Avoidance Measures (RAMs)/Non-Licensed Method Statement (NLMS) recommended. If the site conditions have changed then the authority may require the applicant to provide further information to confirm that the provision of Reasonable Avoidance Measures (RAMs)/Non-Licensed Method Statement (NLMS) is still adequate. A great crested newt Informative has been provided.
- 3.8 **Ecology Consultant:** Comment: -
- 3.9 There is sufficient ecological information to determine the application and confirm that: -
- No further bat surveys are required.
  - One dead ash tree (T34) with low bat roost potential will be removed and will require precautionary felling under ecological supervision, together with appropriate compensatory bat roost provision.
  - All other trees with bat roost potential will be retained.
- 3.10 The site lies within the 12km Wider Conservation Area of The Mens SAC, which supports Barbastelle bats. The ecologist advises that potential effects from lighting and habitat severance must be considered through the Council's project-level Habitats Regulations Assessment (HRA). However, with appropriate mitigation, no adverse effect on the integrity of the SAC is anticipated.
- 3.11 To address this, Place Services supports the implementation of a Wildlife Friendly Lighting Strategy, to be secured by condition, in accordance with Bat Conservation Trust and Institute of Lighting Professionals guidance. This will ensure light levels, spectrum, and orientation do not adversely affect foraging or commuting bats.

- 3.12 The ecologist also supports:
- The Non-Licensed Method Statements for bats, hazel dormouse, common amphibians, reptiles, hedgehog and other protected or priority species contained in the submitted Ecological Appraisal;
  - The proposed biodiversity enhancement measures, which should be secured by condition and delivered through a Biodiversity Enhancement Layout.
- 3.13 With the recommended mitigation and enhancement measures secured by condition, the proposal would not give rise to unacceptable impacts on designated sites, protected species or priority habitats, and would achieve biodiversity net gains, in accordance with national and local policy.
- 3.14 **South Downs National Park Authority (SDNPA):** The SDNPA makes no comment on the principle of development. The site is approximately 5m from the boundary of the National Park, which runs along the south side of Washington Road. The proposed development for outline permission for a dwelling with all matters reserved other than access, would be located in an area where there is pre-existing residential development, and as such the development would likely result in minor impacts on the setting of the National Park.
- 3.15 Development within the setting of a national park should be consistent with the section 245 duty, and Paragraph 189 of the NPPF, which includes specific reference to the setting of National Parks:
- 3.16 **Southern Water:** Comment. If it is the intention of the developer for Southern Water to adopt the proposed SuDS, the system shall be designed and constructed in line with the Design and Construction Guidance [www.water.org.uk/sewerage-sector-guidance-approved-documents/](http://www.water.org.uk/sewerage-sector-guidance-approved-documents/).
- 3.17 **WSCC Highways:** Comment. For the current submission, access to the site will be via an existing private slip road that currently serves Abbots Leigh and Abbots Barn. From inspection of WSCC mapping, there are no apparent visibility concerns with the existing point of access onto Washington Road. In addition, the proposals would not be anticipated to give rise to a significant material intensification of use of this existing access point.
- 3.18 An inspection of collision data provided to WSCC by Sussex Police from a period of the last five years reveals no recorded injury accidents attributed to road layout within the vicinity of the site. Therefore, there is no evidence to suggest the existing access has been operating unsafely or that the proposals would exacerbate an existing safety concern.
- 3.19 Whilst approval is only being sought on matters relating to access, the applicant has submitted an indicative site plan, suggesting a driveway providing two parking bays and a double-bay garage is proposed. This would be in accordance with WSCC Parking Standards for a dwelling of this size and location, and full details of proposed car and cycle parking provision would be expected at reserved matters stage. On-site turning appears achievable, allowing cars to exit in a forward gear.
- 3.20 In summary, the LHA does not consider that this proposal would have an unacceptable impact on highway safety or result in 'severe' cumulative impacts on the operation of the highway network, therefore is not contrary to the National Planning Policy Framework (paragraph 116), and that there are no transport grounds to resist the proposal.
- 3.21 **WSCC Fire and Rescue Service:** Comment. No objections subject to conditions imposed regarding the installation of a fire hydrant or stored water supply to be approved in writing by WSCC Fire and Rescue Service.

PUBLIC CONSULTATIONS:

- 3.22 Representations:  
None received.

- 3.23 Parish Comments: Neutral - the Parish Council would like a response regarding the Golden Crested Newt and further information.

**4. HOW THE PROPOSED COURSE OF ACTION WILL PROMOTE HUMAN RIGHTS**

- 4.1 The application has been considered having regard to Article 1 of the First Protocol of the Human Rights Act 1998, which sets out a person's rights to the peaceful enjoyment of property and Article 8 of the same Act, which sets out their rights in respect to private and family life and for the home. Officers consider that the proposal would not be contrary to the provisions of the above Articles.
- 4.2 The application has also been considered in accordance with Horsham District Council's public sector equality duty, which seeks to prevent unlawful discrimination, to promote equality of opportunity and to foster good relations between people in a diverse community, in accordance with Section 149 of the Equality Act 2010. In this case, the proposal is not anticipated to have any potential impact from an equality perspective.

**5. HOW THE PROPOSAL WILL HELP TO REDUCE CRIME AND DISORDER**

- 5.1 It is not considered that the development would be likely to have any significant impact on crime and disorder.

**6. PLANNING ASSESSMENTS**

**Background**

- 6.1 A preceding outline application on the site for 'the erection of 1No. dwelling with associated private garden space, car parking and landscaping with all matters reserved apart from access' was refused under ref: DC/24/1965 for the following reasons: -
1. *The proposed development would be sited within an unsustainable location in the countryside, outside of a defined built-up area boundary, and on a site not allocated for housing development within the Horsham District Planning Framework, or a made Neighbourhood Plan. Furthermore, the proposed development is not essential to its countryside location. Notwithstanding the absence of a five-year land housing supply, and the provisions of the National Planning Policy Framework (2021) at paragraph 11(d), it is not considered that there are any material considerations in this instance which would outweigh harm arising from conflict with Policies 1, 2, 3, 4 and 26 of the Horsham District Planning Framework (2015) and Policy 1 of the Storrington, Sullington, and Washington Neighbourhood Plan.*
  2. *The proposed new access, due to its siting through the existing native tree belt and positioning within the Root Protection Areas of 5 trees is considered to have an unacceptable impact on the viability of these trees. This would have an unacceptable impact on the character of the street scene as well as an unacceptable impact on the health of these trees, contrary to policies 25, 31 and 33 of the HDPF.*
- 6.2 This decision was subject to an appeal where the Inspector did not agree with the first reason for refusal, with the second reason for refusal withdrawn following the submission of an

Arboricultural Assessment. The appeal was though dismissed solely due to water neutrality not being demonstrated. A copy of this decision is appended to this report and is referenced in the subsequent sections.

**Principle of Development:**

- 6.3 The site is located outside of the Built-Up-Area boundary and is therefore within a countryside location in policy terms. The proposal relates to the erection of 1no. detached two storey dwelling.
- 6.4 Section 38(6) of the Town and Country Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.
- 6.5 Policy 1 of the Horsham District Planning Framework (HDPF) (2015) provides that the Council will work proactively with applicants to achieve development that secures socio-economic and environmental benefits. Reflecting the presumption in favour of sustainable development contained within the NPPF the Council will grant permission for development that accords with the relevant policies of the development plan, unless material considerations indicate otherwise.
- 6.6 Paragraph 83 of the NPPF states that "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."
- 6.7 The application seeks outline planning permission for one dwelling within the curtilage of Abbots Leigh on Washington Road, Storrington. The site lies outside the defined built-up area boundary and therefore falls within the countryside for the purposes of the Horsham District Planning Framework (HDPF) and the Storrington, Sullington and Washington Neighbourhood Plan.
- 6.8 In policy terms, residential development in such locations is generally restricted by Policies 2, 3, 4 and 26 of the HDPF and Policy 1 of the Neighbourhood Plan, which seek to focus new housing within built-up area boundaries, allocated sites, or other locations specifically identified in the development plan. The proposal does not meet the exceptions set out in Policy 26, and the site does not adjoin a defined settlement edge for the purposes of Policy 4. Accordingly, the proposal constitutes a departure from the spatial strategy of the development plan.
- 6.9 This conflict was considered by the Planning Inspectorate in respect of the same site and proposal under DC/24/1965. This appeal was dismissed solely on the basis of failure to deliver water neutrality. The Inspector expressly found in terms of principle that: -
- The site is not isolated, being located amongst a small cluster of dwellings;
  - It is accessible to services and public transport;
  - It is well contained by existing development and designated land;
  - It makes effective use of previously developed land; and
  - Would not result in unacceptable countryside or settlement character harm.
- 6.10 Critically, the Inspector stated:

*"I do not find the site's position outside of the settlement boundary, and thus at odds with the Council's spatial strategy, to be decisive to the outcome of this appeal."*

6.11 And:

*“When considered in the round, the site is Previously Developed Land and located where occupants would be able to access local services and facilities... this along with the small but important boost in housing supply... weighs heavily in favour of the scheme.”*

6.12 The Inspector therefore found that, notwithstanding the conflict with the spatial strategy of the development plan, the site represents a sustainable and acceptable location for housing, particularly in the context of Horsham District’s housing land supply shortfall.

6.13 In this circumstance it is considered there are no reasons to reach a different view on principle to the previous Inspector, and a dwellinghouse on this site in this location is therefore acceptable.

#### **Design and Appearance:**

6.14 Policies 25, 32, and 33 of the HDPF promote development that protects, conserves and enhances the landscape character from inappropriate development. Proposal should take into account landscape characteristics, with development seeking to provide an attractive, functional and accessible environment that complements the locally distinctive character of the district. Buildings should contribute to a sense of place, and should be of a scale, massing, and appearance that is of a high standard or design and layout which relates sympathetically to the landscape and built surroundings.

6.15 Paragraph 135 of the NPPF states that planning decisions should ensure that developments function well and add to the overall quality of the area; are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting; establish a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development; and create places that are safe, inclusive and accessible.

6.16 This is an outline planning application with all matters reserved apart from access. The detailed design and appearance of the new dwelling would be considered at reserved matters stage. However, there is mature boundary screening with limited views in and out of the site and no reasons to believe an appropriate siting, design and layout could not be achieved at reserved matters stage.

#### **Residential Amenity:**

6.17 Policy 33 of the HDPF seeks to ensure that development proposals do not result in unacceptable harm to the amenity of nearby occupiers or users of the surrounding land. In this instance, the proposed four-bedroom, two-storey detached dwelling at Wealden Barn has been reviewed in the context of neighbouring amenity.

6.18 This is an outline application with all matters reserved apart from access. The proposed dwelling would be situated on an existing residential garden, set away from neighbouring properties, which limits its potential to cause direct harm to privacy or light. The placement of the building is likely to ensure sufficient separation distances, mitigating concerns about overlooking or overshadowing. The scale and two-storey design of the dwelling, while prominent, are unlikely to result in any adverse impact on neighbouring properties given the spatial relationship between the proposed house and the closest residences.

### **Access and Highways Impacts:**

- 6.19 Policy 40 of the Horsham District Planning Framework states that transport access and ease of movement is a key factor in the performance of the local economy. The need for sustainable transport and safe access is vital to improve development across the district. Policy 41 of the Horsham District Planning Framework states that development that involved the loss of existing parking spaces will only be allowed if suitable alternative provision has been secured elsewhere. Adequate parking facilities must be provided within the developments to meet the needs of the anticipated users.
- 6.20 This application seeks to secure the access point as part of the outline permission. Given the limited scale of the development (one additional dwelling), the use of an existing access, and the absence of any technical objection from the Local Highway Authority, the proposal would not result in a material increase in traffic movements that would prejudice highway safety, the free flow of traffic, or the operation of the local highway network. This view is consistent with the preceding appeal decision on the site.
- 6.21 The development therefore complies with Policies 40 and 41 of the Horsham District Planning Framework and with paragraph 111 of the National Planning Policy Framework

### **Trees:**

- 6.22 The site contains a number of mature trees of amenity value, including trees adjacent to the proposed access and driveway. These matters were previously raised as a reason for refusal by the Council but were addressed during the appeal process through the submission of a detailed Arboricultural Appeal Statement prepared by PJC Consultancy Ltd (Ref: PJC/6801/25-01 Rev –, dated 21 March 2025).
- 6.23 The Inspector confirmed that, subject to conditions, the arboricultural impacts had been satisfactorily resolved and that it was not necessary to consider the matter further. For the current application, the Council's Tree Officer has reviewed the same arboricultural evidence base and has confirmed that the development is acceptable subject to conditions securing:
- A detailed Arboricultural Method Statement (AMS);
  - A no-dig, multi-layer Cellweb TRP driveway construction within root protection areas;
  - Controlled build-up of levels;
  - Approved edging solutions; and
  - Full tree protection and supervision measures.
- 6.24 The recommended conditions require that all works are carried out strictly in accordance with the approved AMS and prohibit any excavation or ground alteration within Root Protection Areas except as expressly permitted by the AMS. These measures ensure that:
- Root systems are protected;
  - Soil structure and aeration are maintained;
  - Construction impacts are fully controlled; and
  - The long-term health and retention of the trees is secured.
- 6.25 With these conditions in place, the proposal would preserve and protect important trees on the site in accordance with Policies 30 and 33 of the Horsham District Planning Framework and BS 5837:2012. There is therefore no arboricultural reason to withhold planning permission.

### **Ecology**

- 6.26 Policy 31 of the Horsham District Planning Framework seeks to ensure that development protects, enhances and where possible creates habitats for biodiversity and contributes

positively to green infrastructure. Paragraphs 180 and 186 of the National Planning Policy Framework (2024) require development to avoid significant harm to biodiversity, mitigate unavoidable impacts, and secure measurable net gains for biodiversity.

- 6.27 The application is supported by a Preliminary Ecological Appraisal (PJC Consultancy Ltd., October 2024) which has been reviewed by the Council's ecological adviser. The site comprises approximately 0.3ha of residential gardens, scattered mature trees, hedgerow and a small area of woodland on the southern boundary. One dead ash tree (T34) and approximately 0.1ha of woodland and hedgerow would be removed, with all other trees and habitat features retained. Replacement native hedgerows, fruit and nut trees and buffer planting are proposed.
- 6.28 The survey confirmed that the outbuilding has negligible bat roost potential and that the only tree to be removed has low bat roost potential (PRF-I). Subject to a precautionary bat working method statement and advance roost compensation, no further bat surveys are required. The Council's ecologist has confirmed that this approach accords with current Bat Conservation Trust and CIEEM guidance.
- 6.29 The site lies within the 12km Barbastelle bat consultation zone for The Mens Special Area of Conservation (SAC) and therefore potential impacts on bat flight lines and functionally linked land must be considered under the Habitats Regulations. Records confirm Barbastelle and other bat species within 2km of the site. While no roosts are affected, light spill could affect bat commuting and foraging routes. Accordingly, a wildlife-sensitive lighting strategy is required, and this matter has been screened into the Stage 2 Appropriate Assessment of the Council's project-level Habitats Regulations Assessment.
- 6.30 With the imposition of conditions requiring a sensitive lighting scheme, bat mitigation, habitat retention and enhancement, the Council's ecologist has confirmed that the development will not give rise to an adverse effect on the integrity of The Mens SAC, either alone or in combination with other plans and projects.
- 6.31 The submitted Ecological Appraisal also identifies the potential presence of Hazel Dormouse, reptiles, amphibians and other Priority species. Appropriate non-licensed precautionary working method statements and the appointment of an Ecological Clerk of Works (ECoW) are proposed to ensure that harm is avoided during construction. These measures will be secured by condition.
- 6.32 In addition, a Biodiversity Enhancement Layout will be required at Reserved Matters stage to secure delivery of the proposed habitat creation and species-specific enhancements in accordance with the NPPF and Policy 31.
- 6.33 On this basis, the Local Planning Authority is satisfied that there is sufficient ecological information to determine the application and that, subject to conditions, the proposal would comply with Policy 31 of the HDPF, paragraphs 180 and 186 of the NPPF (2024), and the Council's statutory duties under the Conservation of Habitats and Species Regulations 2017 and Section 40 of the Natural Environment and Rural Communities Act 2006.

#### **Water Neutrality:**

- 6.34 A 2021 Position Statement from Natural England identified that it could not be concluded with the required degree of certainty that new development in the Sussex North Water Supply Zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites. As a consequence, and to comply with the legal duties set out in the Conservation of Habitats and Species Regulations 2017 (known as the Habitat Regulations), all new development since has been required to demonstrate water neutrality.

- 6.35 On 31st October 2025 Natural England formally withdrew the 2021 Position Statement, citing a package of measures that they were satisfied would safeguard the Arun Valley sites. Principal amongst these measures is a reduction in the Southern Water abstraction licence 'by March 2026'. However, given the licence change has not yet taken place Horsham District Council, as competent authority under the Habitats Regulations, cannot yet be certain that new development will not result in adverse impacts on the Arun Valley sites.
- 6.36 To ensure development can come forward as water neutral in the meantime, the Council has agreed with Natural England to use the significant water savings made by Southern Water in 2024/25 through their programme of leakage reduction (amongst other measures). This has generated some 3,240,000 litres per day of water savings that can now be attributed to new development without increasing water abstraction in the Arun Valley beyond baseline. These savings were previously to be used to launch the Sussex North Water Certification Scheme (SNWCS), however following the withdrawal statement SNWCS will no longer be launching. Natural England standing advice dated 10 November 2025 raises no objection to using these savings to enable development to come forward. The standing advice clarifies that it functions as Natural England's formal response pursuant to Regulation 63(3) of the Conservation of Habitats and Species Regulations 2017 to all relevant planning applications which seek to achieve water neutrality using the above Southern Water savings.
- 6.37 Officers have undertaken an Appropriate Assessment which demonstrates that the anticipated increase in mains water consumption from this development, alongside all other development granted since the 31st of October 2025, will not exceed 3,240,000 litres per day.
- 6.38 It is considered that the water consumption at the site can be controlled by condition limiting water to 110 litres per person per day. As such, a s106 Legal Agreement is no longer required to secure water neutrality.
- 6.39 Accordingly, Officers consider that the proposed development will not have an Adverse Effect on the Integrity of the Arun Valley Site, either alone or in combination with other plan and projects, thereby complying with Regulations 63 and 70 of the Conservation of Habitats and Species Regulations 2017, HDPF Policy 31, and paragraph 193 of the NPPF.

### **Biodiversity Net Gain (BNG)**

- 6.40 Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) mandates that every development must achieve at least a 10% Biodiversity Net Gain (BNG) unless the development qualifies as exempt under the Biodiversity Gain Requirements (Exemptions) Regulations 2024).
- 6.41 The Applicant has demonstrated that the development is exempt from the requirement to achieve a minimum 10% BNG by reason of:
- The development qualifies as 'self-build or custom housing' under Regulation 8 of the Biodiversity Gain Requirements (Exemptions) Regulations 2024

### **Conclusions and Planning Balance**

- 6.42 The proposed development comprises a single four-bedroom detached dwelling within the curtilage of Abbots Leigh. The proposal has been assessed against the Horsham District Planning Framework (HDPF), the Storrington, Sullington and Washington Neighbourhood Plan, national planning policy, consultee responses, and the material consideration of the Planning Inspectorate's decision for a preceding application on the site.
- 6.43 It is acknowledged that the site lies outside the defined Built-Up Area Boundary and therefore conflicts in principle with Policies 2, 3, 4 and 26 of the HDPF and Policy 1 of the

Neighbourhood Plan, which seek to focus new housing within settlement boundaries, allocated sites, or specific countryside exceptions. The proposal therefore represents a departure from the spatial strategy of the development plan.

- 6.44 However, Horsham District Council is unable to demonstrate a five-year supply of deliverable housing land, with the most recent evidence confirming a supply of only 1.7 years. In these circumstances, paragraph 11(d) of the National Planning Policy Framework is engaged, and the presumption in favour of sustainable development applies unless there is a strong reason for refusal.
- 6.45 The principle of development on this site has already been comprehensively assessed by the Planning Inspectorate in respect of the same proposal. The Inspector found that, notwithstanding the conflict with settlement boundary policies, the site represents a sustainable and acceptable location for housing, having regard to:
- The site's containment between existing dwellings and designated land;
  - Its previously developed status;
  - Its accessibility to services and public transport;
  - The absence of countryside, landscape or settlement character harm; and
  - The contribution to housing supply in a severe shortfall context.
- 6.46 The Inspector expressly concluded that the site's position outside the built-up area boundary was not decisive, and that the proposal performed well in planning terms. The appeal was dismissed solely because water neutrality mitigation was not legally secured.
- 6.47 Following the withdrawal of Natural England's Position Statement, that deficiency has now been resolved through a condition requiring the dwelling to achieve a maximum internal water consumption of 110 litres per person per day, ensuring compliance with the Council/Natural England's updated water neutrality methodology and the Habitats Regulations. As a result, the proposal no longer gives rise to any adverse effect on the Arun Valley SPA, SAC or Ramsar site.
- 6.48 There are no outstanding technical objections. The Local Highway Authority raises no concerns in respect of access or highway safety, and the Council's Tree Officer confirms that the development is acceptable subject to detailed Arboricultural Method Statement and tree protection conditions, securing the long-term health and retention of important trees on the site.
- 6.49 The development would deliver an additional dwelling in a District experiencing a significant housing shortfall. While small in scale, such windfall sites are expressly recognised by national policy as an important and effective means of boosting housing delivery, particularly where they can be delivered quickly and without strategic infrastructure.
- 6.50 In the absence of any technical harm, environmental harm, highway harm, arboricultural harm or Habitats Regulations conflict, there is no longer any strong reason to disapply the presumption in favour of sustainable development.
- 6.51 When the development is considered in the round, and in light of the Inspector's findings on the same proposal, the benefits of the scheme — including the contribution to housing supply, efficient use of land, and sustainable location — outweigh the identified policy conflict arising from its position outside the built-up area boundary.
- 6.52 Accordingly, the proposal is considered acceptable in planning terms and should be granted planning permission, subject to appropriate conditions.

## 7. RECOMMENDATIONS

7.1 To approve the application subject to the following conditions:

1. A list of the approved plans

2. **Standard Time Condition:**

- a) Approval of the details of the layout of the development, the scale of each building, the appearance of each building and the landscaping of the development (hereinafter called "the reserved matters") shall be obtained from the Local Planning Authority in writing before any development is commenced.
- b) Plans and particulars of the reserved matters referred to in condition (a) above, relating to the layout of the development, the scale of each building, the appearance of each building, and the landscaping of the development, shall be submitted in writing to the Local Planning Authority and shall be carried out as approved. C
- c) Application for approval of the reserved matters shall be made to the Local Planning Authority before the expiration of 3 years from the date of this permission.
- d) The development hereby permitted shall begin either before the expiration of 3 years from the date of this permission, or before the expiration of 2 years from the date of approval of the last of the reserved matters to be approved, whichever is the later.

Reason: To enable the Local Planning Authority to control the development

3. **Pre-Commencement Condition:** No development shall commence until a scheme for the disposal of foul and surface water has been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be implemented in accordance with the approved scheme.

Reason: As this matter is fundamental to ensure that the development is properly drained and to comply with Policy 38 of the Horsham District Planning Framework (2015).

4. **Pre-Commencement Condition:** No development shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall include:

- site access arrangements,
- parking and loading for contractors,
- dust, noise and vibration control measures,
- site contact details.

Construction shall be carried out in accordance with the approved CEMP.

Reason: As this matter is fundamental in order to consider the potential impacts on the amenity of nearby occupiers during construction and in accordance with Policy 33 of the Horsham District Planning Framework (2015).

5. **Pre-Commencement Condition:** Prior to the commencement of the development a fire hydrant or alternative fire-fighting water supply shall be provided in accordance with West Sussex Fire and Rescue Service guidance.

Reason: To ensure adequate fire-fighting infrastructure in accordance with HDPF Policies 33 and 39 and paragraph 135 of the NPPF (2024).

6. **Pre-Commencement Condition:** No development above ground floor slab level shall take place until an environmental noise survey has been submitted to and approved in writing by the Local Planning Authority.

If noise levels are calculated to result in internal noise levels exceeding those quoted in BS8233:2014, then a scheme of noise and vibration attenuation and ventilation sufficient to prevent overheating and maintain thermal comfort shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include acoustic performance details of the building facades and glazing and shall achieve the habitable room standards as detailed in BS8233:2014 with no relaxation for exceptional circumstances and appropriate consideration of L<sub>Amax</sub>. Any mechanical ventilation shall be designed and installed in accordance with the ANC Acoustics Ventilation and Overheating: Residential Design Guide 2020.

The development shall be carried out in accordance with the agreed details and shall be retained as such thereafter.

Reason: To ensure an acceptable standard of accommodation for future occupants and to accord with Policies 32 and 33 of the Horsham District Planning Framework (2015).

7. **Pre-Occupation Condition:** The development hereby permitted shall not be first occupied until a scheme demonstrating that outdoor amenity space will achieve ≤55dB LAeq (16hr) has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the agreed details prior to first occupation and shall be retained as such thereafter.

Reason: To ensure an acceptable standard of accommodation for future occupants and to accord with Policies 32 and 33 of the Horsham District Planning Framework (2015).

8. **Regulatory Condition:** All works shall be executed in full accordance with the Arboricultural Impact Assessment / Method Statement (prepared by PJC Consultancy and dated October 2024).

Reason: To ensure the successful and satisfactory protection of important trees, shrubs and hedges on the site in accordance with Policies 30 and 33 of the Horsham District Planning Framework (2015).

9. **Regulatory Condition:** The construction of the new access and driveway shall be carried out strictly in accordance with the Arboricultural Method Statement (AMS) and technical details set out within the Arboricultural Appeal Statement (PJC Consultancy, Ref: PJC/6801/25-01 Rev –, dated 21 March 2025). The approved AMS shall be adhered to in full and shall include, but not be limited to:

- (a) the no-dig, multi-layer Cellweb TRP construction;
- (b) the specified build-up above existing ground levels and prohibition of excavation within RPAs;
- (c) the method of raising the existing driveway to tie into the no-dig surface;
- (d) the agreed edging solutions; and
- (e) all tree protection measures, and any soil improvement works.

No variation, excavation, or ground alteration within the RPAs of retained trees shall take place other than as expressly set out in the AMS.

Reason: To ensure the protection and long-term health of retained trees, in accordance with Policy 33 of the Horsham District Planning Framework (2015) and BS 5837:2012.

10. **Regulatory Condition:** All mitigation and precautionary measures set out in the Preliminary Ecological Appraisal (PJC, October 2024) shall be implemented in full. This includes the non-licensed Precautionary Method Statement for Hazel Dormouse, common amphibians and reptiles in Appendix VI and the Precautionary Method Statement for mobile protected and Priority species in Sections 4.6.39 to 4.3.79 of the Preliminary Ecological Appraisal (PJC Consultancy Ltd., October 2024).

Reason: To conserve and enhance protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (as amended) and Policy 31 of the Horsham Development Framework.

11. **Regulatory Condition:** The dwellings hereby permitted shall meet the optional requirement of building regulation G2 to limit the water usage of each dwelling to no more than 110 litres per person per day. The subsequently installed water limiting measures shall thereafter be retained.

Reason: To limit water use in order to improve the sustainability of the development and to ensure the development is water neutral to avoid an adverse impact on the Arun Valley SACSPA and Ramsar sites in accordance with Policies 31 and 37 of the Horsham District Planning Framework (2015), Paragraph 193 of the National Planning Policy Framework (2024), its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).

#### NOTE TO APPLICANT

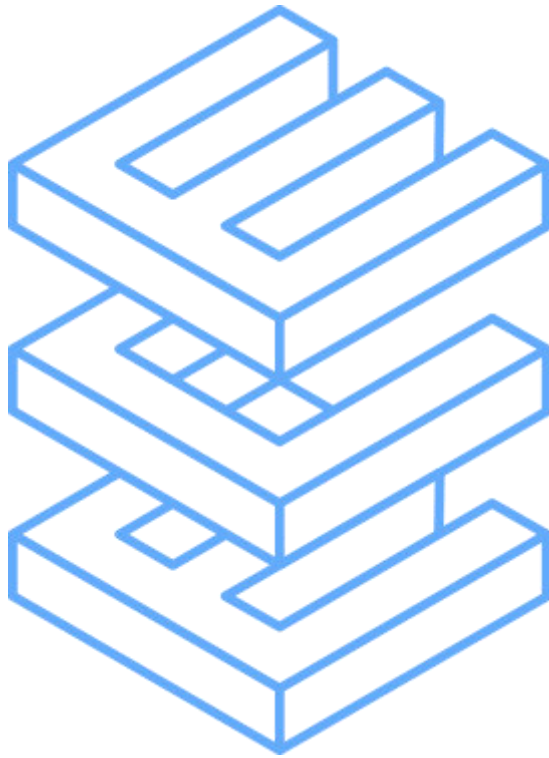
##### **Statutory Biodiversity Net Gain Requirement**

In accordance with Schedule 7A of the Town and Country Planning Act 1990, this planning permission is subject to the statutory biodiversity gain condition. Development must not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the Local Planning Authority, and
- (b) the Local Planning Authority has approved the Plan.

For outline permissions, the Biodiversity Gain Plan will normally be prepared and submitted at or prior to commencement following approval of the Reserved Matters, when the site layout, landscaping and areas of habitat loss and creation have been finalised.

Guidance on the content of a Biodiversity Gain Plan can be found at: [Submit a biodiversity gain plan – GOV.UK](#). Statutory exemptions and transitional arrangements are set out in the Planning Practice Guidance (Paragraph 003, Reference ID 74-003-20240214).



# Appendix C - Inspector's Appeal Decision for Ref. 6007707 dated 7 July 2026



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## Appeal Decision

Site visit made on 24 June 2026

**by Nicola Davies BA DipTP MRTPI**

an Inspector appointed by the Secretary of State

**Decision date: 07 July 2026**

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### **Appeal Ref: 6007707**

**Land adjoining No.2 and No.3 Townhouse Cottages, Townhouse Farm, Coolham Road, THAKEHAM RH20 3EW**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
  - The appeal is made by Fowlers Land and New Homes against the decision of Horsham District Council.
  - The application Ref is DC/25/1909.
  - The development proposed is the demolition of existing storage unit and erection of 2no. detached dwellings, associated private gardens, parking and landscaping.
- 

### **Decision**

1. The appeal is dismissed.

### **Main Issues**

2. The main issues in this case are whether the site is suitable for the proposed development, having regard to the spatial strategy of the development plan, and access to services and facilities.

### **Reasons**

3. Policies 2, 3 and 4 of the Horsham District Planning Framework (the HDPF) set out the growth strategy for the District focusing development in the main settlements or as expansions of those settlements and seek to ensure that development takes place in the most sustainable locations as possible. The appeal site is located approximately 0.2km from Thakeham and is outside of and beyond any built-up settlement boundary. The site is therefore located within the countryside in policy terms.
4. Pursuant to Policy 4 of the HDPF the Council has published a guidance document titled "Shaping Development in the Horsham District" where it is recognised that there are likely to be planning applications submitted outside of defined built-up area boundaries and on unallocated sites. This is a guidance document that sets out criteria. The appeal site does not adjoin a settlement edge as defined by the built-up area boundary, and the development would not meet all of the criteria set out within this document. The proposed development would therefore not be fully compliant with the guidance document.
5. In tandem with the above policy approach, Policy 26 of the HDPF only permits development in the countryside where such a location is essential, and the

proposal meets one of four criteria. These are that it either supports the needs of agriculture or forestry; enables the extraction of minerals or the disposal of waste; provides for quiet informal recreation use; or enables the sustainable development of rural areas. The proposed development does not meet any of the criteria and, therefore, does not comply with Policy 26 of the HDPF.

6. The site, although hosting a redundant storage structure, comprises mostly of undeveloped grassland sited between existing residential properties and agricultural buildings. The wider area beyond this small cluster of residential and agricultural buildings is open countryside. The development would not represent urban sprawl or encroachment into the wider open countryside. Whilst these are attributes of the proposed scheme when taken on their own merits, the site is however located within the countryside beyond any settlement boundary and, for this reason, does not comply with development plan policy.
7. Thakeham is defined as a “Smaller Village” under Policy 3 of the HDPF, where these villages have limited services, facilities, social networks, but do have good accessibility to larger settlements or settlements with some employment but limited services, facilities, or accessibility.
8. The opportunities to maximise sustainable transport solutions vary between urban and rural areas. As noted above, the site is approximately 0.2km from Thakeham. The highway that leads to Thakeham does not host pedestrian pavements. As such, it would not be an attractive option to walk to Thakeham. There are Public Rights of Way (PRoW) in the area that would facilitate walking to Thakeham through fields and woodland, which would not be suitable for the elderly, those with mobility issues or parents with young children. It would however be possible to cycle to Thakeham.
9. The local planning authority highlight that PRoW footpath 2376 is located immediately to the east of the site that adjoins Public Footpath 2475 to The Street, Thakeham. Whilst the footpath may be paved it is unlit. I have also been directed by the appellant to paved Public Footpath 2474. It would also be unlit and would require future occupiers to walk approximately 1km to access the limited facilities within the village. These footpaths would only be attractive during clement weather and during the hours of daylight.
10. From the information provided it appears that public footpath 2474 would connect with Storrington Road (B2139) and a development at Abingworth that includes community facilities, a café/store, village hall, recreation areas and open space. However, it appears to me that those facilities are located further from the appeal site than Thakeham and, as such, are further afield.
11. The appeal site is located within proximity to bus stops. Timetables provided by the local planning authority indicate connection between Thakeham, Horsham and Storrington by a single regular service Monday to Friday. However, the timetable does not show there to be a service at the weekends.
12. Whilst the site would be located in close proximity to public footpaths leading to Thakeham built-up area, and within proximity of bus stops servicing Horsham and Storrington, these are unlikely to offer viable or attractive alternatives to private vehicle due to the distance and unlit nature of the PRoWs leading to Thakeham and the lack of the bus service at the weekends. The future occupiers would

therefore be reliant upon the amenities, services and facilities of other settlements, which has the potential to further increase reliance on private vehicles. Whilst the Highway Authority has raised no technical objection to the proposal, the local planning authority has identified accessibility and sustainability concerns pertaining to the proposal.

13. For these reasons, I conclude that the site would not be a suitable location for the proposed development, having regard to the spatial strategy of the development plan and accessibility. The proposal would, therefore, conflict with Policies 1, 2, 3, 4 and 26 of the HDPF and the provisions of the National Planning Policy Framework (the Framework).
14. I have been directed to S5 - Criterion (e) of the emerging National Planning Policy Framework. However, that Policy Framework has not been formally adopted and therefore the criterion holds little weight in favour of the proposal.

### **Other Matters**

15. It is suggested that residential redevelopment has been permitted within the cluster of development surrounding Townhouse Cottages. The appellant makes no reference to the specifics of these applications, however on the Council's review of the planning history, it is noted that a number of residential conversions have taken place over the years. These related to former agricultural buildings converted to dwellings. The considerations pertaining to the conversion of existing buildings in the rural area would be different to that of new buildings, which is the case here.
16. I have been referred to a site known as Abbots Leigh at Storrington whereby a Planning Inspector (Appeal Ref: APP/Z3825/W/25/3363148) found the location to be acceptable outside of the built up area despite not being served by a lit access to the nearest settlement. That decision demonstrates that conflict with settlement boundary policy is not automatically decisive. The Planning Inspector attached substantial weight to the provision of a single dwelling in the same Horsham District policy context. It is suggested that there is no reasoned basis for attributing lesser weight to this proposal. I note also that that site was not served by a lit access to the nearest settlement.
17. I have also been referred to a recent appeal decision at Quince Cottage, Mill Lane, Partridge Green, RH13 8JU (Appeal Ref: 6004865) where the Inspector attached positive weight to the delivery of 2 dwellings as a small site capable of being developed quickly and found that, despite conflict with countryside policies, the proposal benefited from the presumption in favour of sustainable development. However, I note that the Inspector considered there would be sufficient sustainable transport options available to future residents to allow them to access services and facilities in Partridge Green.
18. Notwithstanding this, the local planning authority has provided 7 other appeal decision examples that over recent years have been considered against the same development plan policy context (appeal refs: APP/Z3825/W/21/3280084, APP/Z3825/W/24/3352708, APP/Z3825/W/25/3365004, APP/Z3825/W/24/3341185, APP/Z3825/W/24/3346736, APP/Z3825/W/25/3375892 and APP/Z3825/W/25/3371528). I accept that not all these cases dealt with the issue of accessibility. Nonetheless, in each case the principle of residential development has been considered and the tilted balance applied. The proposed

developments were on a site within the countryside and not allocated for development and were found to be in conflict with the District's spatial strategy for housing.

19. I acknowledge that parallels can be drawn with regard to each of the cases highlighted above. Nonetheless, those cases were considered upon their own specific facts and merits. Equally this case can and should be considered on its own individual circumstances and merits.

### **Planning Balance**

20. The Council advises that it cannot demonstrate a 5-year housing land supply. The most recent Annual Monitoring Report 2024/2025 indicates there to be a 1.7-year housing land supply. Therefore, those policies that direct housing growth within the District are out of date. As there is not a 5-year supply of deliverable sites in place, the provisions of paragraph 11d)ii of the Framework should be applied.
21. The proposal would create two high-quality family sized homes without causing any unacceptable impacts upon the living conditions of existing neighbouring occupiers. The design of the dwellings would be acceptable taken on their own merits and they would assimilate with the local character of the area and infill development between existing developments responding to the existing pattern of development. The proposal would secure Biodiversity Net Gain. The site is not covered by any landscape, heritage or ecological designations that might restrict development of the site. The proposal is also acceptable in other technical respects, such as, in highway, ecology and drainage terms, amongst others, subject to appropriately worded planning conditions. Nonetheless, the proposal would be required to be acceptable in respect of these individual planning considerations take on their own merits in order for planning permission to be forthcoming.
22. The adverse impacts arising from the proposal relate to the unsatisfactory location of the development, including the need for private travel. The proposal would dilute the District's overall growth strategy for the pattern of residential development and would also be contrary to the expectations of the Framework.
23. On the other hand, the Government's objective is to significantly boost the supply of homes and that the cumulative impact of developing small sites can help meet supply and be delivered quickly. Even if the deficit in housing land supply is acute, two dwellings would make a modest difference to the overall supply of housing and the support two dwellings would provide to the social and local economy would be minimal. The contribution to the economy during the construction process would be temporary and short term. The harm that I have identified relating to the unsatisfactory location of the development and unsustainable location in regard of the reliance of private vehicle to access services and facilities, is not outweighed by the contribution to housing land supply or those limited environmental, social and economic benefits associated with the proposal.
24. Consequently, the adverse impact of the site's location and accessibility would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework when taken as a whole. As a result, the presumption in favour of sustainable development does not apply.
25. The appellant contends that the local planning authority has applied incorrect weight to the housing need and the absence of identified harm suggesting that the

local planning authority's application of the tilted balance is incorrect. I have found that the development would undermine the adopted development plan special strategy for the District and significant weight should be attributed to this.

**Conclusion**

26. Having regard to the above findings, the appeal should be dismissed.

*Nicola Davies*

INSPECTOR