



APPLICATIONS & APPEALS SERVICES

**DEMOLITION OF EXISTING BUILDINGS.
ERECTION OF FOUR DWELLINGS WITH
ASSOCIATED PARKING AND LANDSCAPING.**

**ST JOHNS FARM, TROUT LANE, WEST SUSSEX
RH13 0JN**

PLANNING STATEMENT

APRIL 2026



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1.0 INTRODUCTION

1.1 Planning permission is sought for the demolition of existing buildings and the erection of four dwellings with associated parking and landscaping at St Johns Farm, Trout Lane West Sussex RH13 0JN.

1.2 This supporting Planning, Design and Access Statement sets out the detail of the proposal which is described and appraised having regard to the following aspects.

- **Physical Context** – explains the physical context of the site and its surroundings;
- **Planning Context** – relevant planning history of the site and broad policy requirements;
- **Use** – the purpose of the proposed development;
- **Amount** – the extent of development on the site;
- **Scale** – details of the physical size of the proposed development;
- **Layout** – the relationship of the proposed development to the site and its setting;
- **Appearance** – details of materials, style and impact upon the existing and neighbouring properties;

- **Landscape** – impact of the proposal on the existing landscape and proposed planting and surfacing;
- **Access** – access to the proposed development and associated parking.

1.3 The Statement will demonstrate that the proposed development accords with the relevant planning policies and is acceptable in all respects.

2.0 PHYSICAL CONTEXT

2.1 The application site is situated to the east side of Trout Lane. It measures 0.53 ha and comprises a former modern farmyard with buildings used for commercial purposes (Sui generis, B2 and B8 storage) but now vacant. It wraps around a single dwelling, which is outside the application site.

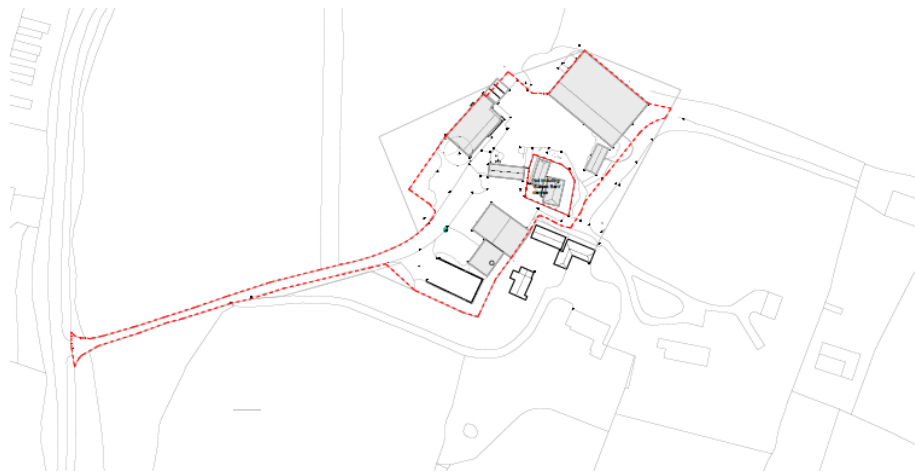


Figure 1 - Site location plan

2.2 There is an existing access from Trout Lane leading to the application site and existing commercial and residential properties. There is a public right of way (footpath) along the

shared access drive which runs through the centre of the application site into the woodland to the north.



Figure 2 - Existing site layout

- 2.3 To the north and west of the site is Madgeland Wood, which is identified as an ancient woodland, and the site is located in a bat sustenance area.
- 2.4 The site is within an area identified as the Low Weald Landscape Character Area and Landscape Character Area: G11 – Southwater and Shipley Wooded Farmlands.

2.5 Photographs of the existing site are set out below:





3.0 PROPOSAL

3.1 The application seeks planning permission for the demolition of the existing buildings and the erection of four detached dwellings. The L-shaped Sussex barn style dwellings would be single and 1.5 storey in form (with accommodation in the roof space). The elevations would include brick plinths with wood cladding above and clay tiles to the roofs.

3.2 The dwellings include:

- Plot 1 – five-bedroom dwelling with detached double car port
- Plot 2 – four-bedroom dwellings with integral double car port
- Plot 3 – four-bedroom dwelling with detached double car port
- Plot 4 – four-bedroom dwelling with integral car port.

3.3 Each plot would include an area of parking to the front of the dwellings to supplement the car ports. External boundaries of the plots would be defined by stone walls or timber split pole fencing with additional soft landscaping within and around the

boundaries. No trees are to be removed along the external boundaries of the site.

3.4 The existing access would be retained and the layout of the hard surfacing between the new dwellings would ensure sufficient space for vehicular movements to and from the dwellings whilst preserving a pedestrian right of way through the site.



Figure 3 - Proposed site layout plan



Figure 4 - Street views of proposed development



Figure 5- Plot 1



Figure 6 - Plot 2



Figure 7 - Plot 3



Figure 8 - Plot 4

4.0 PLANNING HISTORY

4.1 The relevant planning history for the application site is as follows:

- DC/20/2385 - Application to confirm the continuous use of a silage clamp for storage and distribution of woodchip (Class B8 use) purposes for a period in excess of ten years (Certificate of Lawful Development – Existing). Granted 16/04/21 (area to south of south barn)
- DC/20/2344 - Application to confirm the continuous use of a plant hire and store/workshop and associated external area for Civil Engineering (Sui Generis Use Class) purposes for a period in excess of ten years (Certificate of Lawful Development - Existing). St Johns Farm Trout Lane Brooks Green Horsham West Sussex RH13 0JN Permitted. 21/05/21
- DC/20/1622 - Application to confirm the continuous use of a former silage clamp for the storage and distribution of woodchip to fuel biomass boilers (B8 Use) purposes for a period in excess of ten years (Certificate of Lawful Development - Existing). WITHDRAWN
- DC/20/0272 - Change of use of building from B1 use, vehicle servicing and repairs, to B2 use, car servicing, repairs and MOT. Erection of a single storey side/rear extension. Permitted. 07/04/2020
- SP/54/03 - Removal of condition 1 of sp/54/02 relating to the discontinuance of the use of power tools. Permitted 23/01/2004
- DC/17/0759 – Unit 3 St Johns Farm Trout Lane Brooks Green Horsham West Sussex RH13 0JN Change of use from B1 use (vehicle servicing and repairs) to B2 use (car servicing, repairs and MOT) and side and rear extension.
- SP/60/01 – Change of Use of buildings to workshops and long term storage and office. St Johns Farm Trout Lane Brooks Green Horsham West Sussex RH13 0JN Permitted 20/03/2002
- SP/49/95 - Removal of condition 4 from SP/21/95 (relating to use of power tools and panel beating) Site: St Johns Farm Brooks Green. REFUSED 02/01/96
- SP/21/95 – Continued use of building for B1 use (small vehicle and car repairs and minor spraying) Site: St Johns Farm Brooks Green. Permitted 15/08/1995

5.0 POLICY CONTEXT

5.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), the determination of an application must be made in accordance with the Development Plan unless material considerations indicate otherwise. This includes national and local planning policies.

5.2 On the national level, the National Planning Policy Framework (2024) and the following are material considerations.

- National Planning Policy Guidance (NPPG)
- National Design Guide
- Technical Housing Standards

National Planning Policy Framework (the “NPPF”) 2024
The NPPF sets out the Government’s planning policies for England and Wales and how these should be applied. It provides a framework for the preparation of local plans for housing and other development. The NPPF should be read as a whole.

5.3 Paragraph 2 of the NPPF sets out that **“Planning law requires that applications for planning permission be**

determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.”

Sustainable development

5.4 Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has the following three overarching objectives which are independent but need to be pursued in mutually supportive ways:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment, including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change, including moving to a low carbon economy'.

5.5 Paragraph 10 states **'So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).** For decision-taking this means approving development proposals that accord with an up-to-date development plan without delay. Where there are no relevant development plan policies or the relevant policies are out of

date, paragraph 11d) states that planning permission should be granted unless

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination. (paragraph 11 d).

5.6 Paragraph 12 of the Framework states that **'The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision-making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the**

development plan), permission should not normally be granted. Local planning authorities may take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed’.

- 5.7 In terms of decision-making, the Framework states at paragraph 38 that ‘**Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible’.**

Supply of homes

- 5.8 Paragraph 61 states ‘**To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of**

groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay’.

- 5.9 Paragraph 73 sets out that ‘**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.**’ The development of a good mix of sites should be promoted and local planning authorities should:

a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;

b) seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing;

c) use tools such as area-wide design assessments, permission in principle and Local Development Orders to help bring small and medium sized sites forward;

d) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and

e) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.

- 5.10 Paragraph 78 sets out the requirement that local planning authorities “*should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.*” The supply should include an appropriate buffer (as detailed in the paragraphs 78 and 79).

- 5.11 Paragraph 83 states ‘**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.**’

- 5.12 Paragraph 84 states that ‘**Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:**

- a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;*
- b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;*

- c) the development would re-use redundant or disused buildings and enhance its immediate setting;**
- d) the development would involve the subdivision of an existing residential dwelling; or**
- e) the design is of exceptional quality, in that it:**
 - i. is truly outstanding or innovative, reflecting the highest standards in architecture, and would help raise standards of design more generally in rural areas; and**
 - ii. would significantly enhance its immediate setting and be sensitive to the defining characteristics of the local area’.**

Transport

- 5.13 Paragraph 109 requires transport issues to be considered at the early stages of plan-making and development proposals. This is to ensure that (inter alia) the potential impacts of development on transport networks can be addressed.
- 5.14 Paragraph 110 acknowledges that **‘opportunities to maximise sustainable transport solutions will vary**

between urban and rural areas, and this should be taken into account in both plan-making and decision-making’.

- 5.15 Paragraph 112 states that if setting local parking standards for residential and non-residential development, policies should take into account the accessibility of the development, its type, mix and use, the availability of land and opportunities for public transport, local car ownership levels and the need to ensure that adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or optimising the density of development in city and town centres and other locations that are well served by public transport.
- 5.16 In assessing development proposals, paragraph 115 states that it should be ensured that there are appropriate opportunities to promote sustainable transport modes, that there is safe and suitable access to the site (for all road users) and that any significant impacts on the transport network or on highway safety terms can be cost effectively mitigated to an acceptable degree.

- 5.17 Paragraph 116 makes it clear 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'**.

Making effective use of land

- 5.18 Paragraph 124 of the Framework states that **'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.'** Paragraph 118 (a) encourages multiple benefits from both urban and rural land, including through mixed use schemes.
- 5.19 Paragraph 125 confirms that planning policies and decisions should (inter alia) **'promote and support development of under-utilised land and buildings, especially if this would help meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure).'**

- 5.20 Paragraph 126 states that **'Local planning authorities should take a positive role in identifying and helping to bring forward land that may be suitable for meeting development needs.'** Whilst paragraph 127 notes that **'Planning policies and decisions need to reflect changes in demand for land.'**

- 5.21 When considering land which is developed but not allocated for a specific purpose in the local plan, local planning authorities should take a positive approach to application for alternative uses including using **'retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework...'** (paragraph 128).

- 5.22 Paragraph 129 states the planning policies and decisions should support development that makes efficient use of land taking into account identified housing need, land availability, local market conditions, the desirability of maintaining an area's prevailing character and setting or of promoting regeneration and change and the importance of securing well-designed, attractive and healthy places.

Design

- 5.23 In terms of design, Section 12 seeks to achieve well designed places sets out that the **'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'** (paragraph 131).
- 5.24 Paragraph 135 further states that planning policies and 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. Development should also be sympathetic to local character and history and should be designed with a high standard of amenity for existing and future users.
- 5.25 The contribution of trees to the character and quality of urban environments and to the mitigation of climate change is highlighted in paragraph 136.

- 5.26 Paragraph 139 states that **'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to:**

- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes: and/or*
- b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit with the overall form and layout of their surroundings'.*

Environment

- 5.27 Paragraph 161 states that the planning system should support the transition to net zero by 2050, taking into account all climate impacts. Local planning authorities should expect new

development to comply with any development plan policies pertaining to decentralised energy supply and minimise energy consumption through careful design (paragraph 166).

5.28 Development should plan for climate change, and paragraph 164 states that new development should be planned in ways that:

- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and*
- b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.*

5.29 Paragraph 166 continues and sets out that, in determining applications, local planning authorities should expect new development to a) comply with development plan policies on local requirements for decentralised energy supply (unless it can be demonstrated that this is not feasible or viable) and b) take into account landform, layout, building orientation, massing and landscaping to minimise energy consumption.

5.30 Paragraph 167 advises that significant weight should be given to “the need to support energy efficiency and low carbon heating improvements to existing buildings (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights).”

5.31 Paragraph 170 states that development should also be directed away from areas at highest risk of flooding (existing or future). Where development is necessary in these areas, the development should be “made safe for its lifetime without increasing flood risk elsewhere.” To ensure that development does not increase flood risk elsewhere, applications should be supported by site specific flood-risk assessments where appropriate (paragraph 181). Applications which could affect drainage on or around the site should incorporate sustainable

drainage systems proportionate to the nature and scale of the proposal. (paragraph 182).

5.32 Paragraph 187 states that planning policies and decisions should contribute to and enhance the natural and local environment by (inter alia) recognising the intrinsic character and beauty of the countryside; minimising impacts on and providing net gains for biodiversity; and preventing new and existing development from contributing to, being put at unacceptable risk from or being adversely affected by unacceptable levels of soil, air water or noise pollution or land instability.

5.33 If development results in significant harm to biodiversity which cannot be avoided, paragraph 193 states that planning permission should be refused unless this can be adequately mitigated or, as a last resort, compensated for.

Climate change

5.34 Chapter 14 of the NPPF requires that local plans and decisions seek to reduce the impact of development on climate change.

Other national guidance

5.35 In addition to the NPPF, National Planning Policy Guidance (PPG), Written Ministerial Statements and other policy documents, such as the National Design Guide and Technical Guidance, are material planning considerations.

Development Plan

5.36 At local level, the Development Plan comprises the Horsham District Planning Framework (HDPF) (2015).

Horsham District Planning Framework - (2015)

5.37 HDPF policies relevant to this case are set out below:

- Policy 1 – Sustainable Development
- Policy 2 – Strategic Development
- Policy 3 – Development Hierarchy (Area outside built up area boundary)
- Policy 4 – Strategic Policy Settlement Expansion
- Policy 7 – Strategic Policy: Economic Growth
- Policy 10 - Rural Economic Development
- Policy 15 – Housing Provision
- Policy 16 – 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 – Climate Change
- Policy 36 – Appropriate Energy Use
- Policy 37 – Sustainable Design and Construction
- Policy 38 – Flooding
- Policy 40 – Sustainable Transport
- Policy 41 - Parking

5.38 Policies of particular reference are detailed further as follows.

5.39 Policy 1 establishes the Council's commitment to sustainable development.

5.40 Policy 2 details the broader strategy for development within the District and includes the classification of existing settlements into bands.

5.41 Policy 3 sets out the classifies existing settlements into bands, thereby setting up the development hierarchy. It seeks to direct development to identified built-up areas towns and villages.

5.42 Policy 4 sets out that the growth of settlements will be supported to meet identified local housing, employment and community needs. Outside the built-up area boundaries, expansion will be supported in the following cases:

1.The site is allocated in the Local Plan or in a Neighbourhood Plan and adjoins an existing settlement edge.

2.The level of expansion is appropriate to the scale and function of the settlement type.

3.The development is demonstrated to meet the identified local housing needs and/or employment needs or will assist the retention and enhancement of community facilities and services.

4.The impact of the development individually or cumulatively does not prejudice comprehensive long term development, in order not to conflict with the development strategy; and

5.The development is contained within an existing defensible boundary and the landscape and

townscape character features are maintained and enhanced.

5.43 Policy 7 sets out the measures which would promote sustainable employment development within the District. This includes the

- allocation of land for employment development and new business activity,
- the retention of and potential redevelopment and intensification of existing employment sites
- promoting development supporting small, new and growing businesses
- encouraging appropriate spaces, infrastructure and education facilities to support business,
- promotion of tourism
- encouraging sustainable local employment through Neighbourhood Development Plans.

5.44 Policy 10 is specific to rural economic development, which is to be encouraged to generate economic, social and environmental benefits for local communities. Where development maintains the quality and character of the area whilst sustaining the social and economic activity, it will be

supported in principle. It should be appropriate to the countryside location and must:

1. Contribute to the diverse and sustainable farming enterprises within the district or, in the case of other countryside-based enterprises and activities, contribute to the wider rural economy and/or promote recreation in, and the enjoyment of, the countryside; and either

a..Be contained wherever possible within suitably located buildings which are appropriate for conversion or, in the case of an established rural industrial estate, within the existing boundaries of the estate; or

b. Result in substantial environmental improvement and reduce the impact on the countryside particularly if there are exceptional cases where new or replacement buildings are involved. New buildings or development in the rural area will be acceptable provided that it supports sustainable economic growth towards balanced living and working communities and criteria a) has been considered first

2. Demonstrate that car parking requirements can be accommodated satisfactorily within the immediate

surrounds of the buildings, or an alternative, logical solution is proposed. Proposals for the conversion of rural buildings to business and commercial uses will be considered favourably over residential in the first instance.

5.45 The overall housing targets for the District are detailed in Policy 15. Policy 16 seeks to ensure that development provides appropriate housing in relation to size, type and tenure to meet the needs of the District.

5.46 Development should protect the high quality of the natural environment and minimise exposure to noise, odour, air and light pollution as required under Policy 24. The cumulative impact of committed developments must be appropriately assessed.

5.47 Policy 26 seeks to protect the countryside from inappropriate development. However, where a countryside location is essential, development may be allowed provided that it is of appropriate scale to its location, does not lead to unacceptable levels of activity, respects the character of the area and meets one of the following criteria:

1.Support the needs of agriculture or forestry;

2.Enable the extraction of minerals or the disposal of waste;

3.Provide for quiet informal recreational use; or

4.Enable the sustainable development of rural areas.

5.48 Development should maintain or enhance the existing network of green infrastructure and biodiversity as detailed in Policy 31. Loss of these elements will be resisted, and indeed development should create and manage new habitats where appropriate. Where protected trees are lost, replacement planting will be required.

5.49 New development should feature high quality and inclusive design in line with local character and features as detailed in Policy 32.

5.50 Strategic design principles are detailed in Policy 33. This requires the development should:

1.Make efficient use of land, and prioritise the use of previously developed land and buildings whilst respecting any constraints that exist;

2.Ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land, for example through overlooking or

noise, whilst having regard to the sensitivities of surrounding development;

3.Ensure that the scale, massing and appearance of the development is of a high standard of design and layout and where relevant relates sympathetically with the built surroundings, landscape, open spaces and routes within and adjoining the site, including any impact on the skyline and important views;

4.Are locally distinctive in character, respect the character of the surrounding area (including its overall setting, townscape features, views and green corridors) and, where available and applicable, take account of the recommendations/policies of the relevant Design Statements and Character Assessments;

5.Use high standards of building materials, finishes and landscaping; and includes the provision of street furniture and public art where appropriate;

6.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; and,

7.Ensure buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, unless this conflicts with the character of the surrounding townscape, landscape or topography where it is of good quality.

Proposals will also need to take the following into account where relevant:

8.Incorporate where appropriate convenient, safe and visually attractive areas for the parking of vehicles and cycles, and the storage of bins/recycling facilities without dominating the development or its surroundings;

9.Incorporate measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area; and create visually attractive frontages where adjoining streets and public spaces, including appropriate windows and doors to assist in the informal surveillance of public areas by occupants of the site;

10.Contribute to the removal of physical barriers; and,

11. Make a clear distinction between the public and private spaces within the site.

5.51 Policy 35 states that development would be supported where making contributions to mitigating and adapting to the impact of climate change. Development should be designed to adapt to the impact of climate change, reducing vulnerability in particular to flooding, water supply and changes to landscape.

5.52 Policy 36 requires that development include energy statements to demonstrate that development contributes to clean efficient energy in accordance with the energy hierarchy:

1. Lean – use less energy – e.g. through demand reduction

2. Clean – supply energy efficiently – e.g. through heat networks

3. Green – use renewable energy sources.

5.53 Policy 37 requires that development incorporates measures appropriate to the type of development and location to improve the sustainability of development.

5.54 Development should not contribute to flood risk as detailed in Policy 38.

5.55 Policy 39 states that development will be permitted where there is capacity within existing local infrastructure to serve requirements arising. Where the development creates need for extra capacity, this shall be secured as part of the development as appropriate.

5.56 Similarly, Policy 40 states that development should be appropriate to existing transport infrastructure or provides measures to accommodate the requirements arising from the development. Moreover, development should be located in areas where there are or will be a choice of modes of transport.

5.57 Policy 41 requires that development include adequate parking and facilities to meet the needs of users with consideration of cycle parking and facilities for electric charging and mobility impaired.

Housing land supply

5.58 The NPPF requires Local Planning Authorities (LPAs) to ensure that there is adequate provision of land to meet the housing need for their areas and are required to identify sites to meet five years' worth of housing. The NPPF also sets out a requirement for an additional buffer over the Plan's housing

requirements which should be either 5% or 20%, the latter where there has been a significant under delivery of housing for the previous 3 years.

5.59 The Council's Core Strategy is over 5 years old and the Housing Delivery Test 2023 result for Horsham is 62% delivery against housing need. As such, the 20% buffer should be applied to the local housing need (LHN) for the District and the presumption in favour of sustainable development applies.

5.60 The Council published its updated Authority Monitoring Report (AMR) for the year 2023/24 on 30 April 2025. The AMR sets out that the Council can demonstrate only a 1.0-year housing supply against a five year target of 9,030 dwellings (including the 20% buffer). This is based upon the local housing need in accordance with the revised standard method of calculation introduced in December 2024.

5.61 This is a significant shortfall, and the Council's adopted policies in respect of housing are out of date. This applies in particular to policies 2, 3, 4, 15 and 26 which can be given very limited weight. The tilted balance set out at paragraph 11d of the NPPF is engaged, and this makes clear that planning permission should be granted unless:

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

ii any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole'.

5.62 In light of the significant shortfall of deliverable housing sites, considerable weight should be applied in favour of allowing residential development. Moreover, policies seeking to constrain housing development are not up-to-date and should be given little or no weight.

Other material considerations

- Planning Obligations and Affordable Housing SPD (2017)
- Community Infrastructure Levy (CIL) Charging Schedule (2017)

Emerging Local Plan

5.63 The Council has submitted the draft Horsham District Local Plan for final examination on 26 July 2024. Hearings commenced on 10 December 2024. In a letter dated 16

December 2024, the Inspector expressed serious concerns “about the soundness and legal compliance of the Plan in respect of a number of areas” and cancelled future hearings.

5.64 In his letter dated 4 April 2025, the Inspector issued a more detailed explanation regarding his concerns about the draft local plan, in particular related to the duty to cooperate and the challenges arising from issues of water neutrality. He therefore recommended that the Council withdraw the local plan under S22 of the Planning and Compulsory Purchase Act. If not withdrawn, the Inspector advised that his report “will conclude the Plan is not legally compliant.”

5.65 Although correspondence between the LPA and the Inspector continues, there is little prospect of adoption in the near future, and the formal position remains that the Inspector continues to express concerns about the soundness of the draft Local Plan. In a letter dated 28 November 2025, the Inspector notes two material changes in the plan-making context. The first is the Government’s intention to introduce new regulations which would abolish the Duty to Cooperate in the existing plan-making system as detailed in the Written Ministerial Statement on Reforming Plan Making and the letter from the Minister for Housing and Planning to the Planning Inspectorate dated 27

November 2025. that the Government has stated the intent to abolish the Duty to Cooperate. The second change is the withdrawal of Natural England’s Position Statement on water neutrality as detailed earlier.

5.66 Nevertheless, the Inspector continues to express concerns that the scale of potential work required to address concerns about soundness, particularly in relation to meeting minimum housing need. Therefore, he suggested a procedural/exploratory meeting with the LPA “to explore the implications for the Examination of the Government’s intent to abolish the Duty to Cooperate” and discuss the scope of any necessary main modifications to address matters of soundness already discussed and how long any associated work may take to complete.” This is aligned with the Minister’s written advice in a letter dated 30 July 2024 that pragmatism in considering soundness should only be used “where it is likely a plan is capable of being found sound with limited additional work to address soundness issues...”, and not to “address fundamental issues with the soundness of a plan, which would be likely to require pausing or delaying the examination process for more than six months overall.” The exploratory meeting is scheduled for 26 February 2026.

5.67 In agreeing to the meeting, the Inspector reiterated concerns about the soundness of the submission Local Plan in his letter dated 5 January 2026 . The Inspector notes that substantive main modifications may be required and that the process of addressing the concerns may require an “unreasonable length of time”. It remains, therefore, that the adoption of the draft Local Plan is far from certain and very little weight should be attached to this document.

5.68 Notwithstanding the above, the evidence base may include useful information/references in assessing development proposals. However, any consideration of this evidence should recall that this information has not been tested at examination given the early cancellation of the hearings.

Relevant Legislation

5.69 In considering the issue of the principle of the proposed development it is necessary to also consider the legal framework within which planning decisions are made. Planning legislation holds that the determination of a planning application shall be made in accordance with the Development Plan unless material considerations indicate otherwise (as also confirmed at paragraph 2 of the NPPF).

5.70 Specifically, Section 70 (2) of the Town and Country Planning Act 1990 states that in dealing with planning applications, the Authority shall have regard to the provisions of the development plan (so far as material to the application), a post examination draft neighbourhood development plan, any local finance considerations (so far as material to the application) and any other material consideration.

5.71 Section 38(6) Planning and Compulsory Purchase Act 2004 provides:

"If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

5.72 When considering whether or not a proposed development accords with a development plan, it is not necessary to say that it must accord with every policy within the development plan. The question is whether it accords overall with the development plan (Stratford on Avon v SSCLG [2014] JPL 104). Even if a proposal cannot be described as being in accordance with the development plan, the statutory test

requires that a balance be struck against other material considerations. The Courts have emphasised that a planning authority is not obliged to strictly adhere to the development plan and should apply inherent flexibility: *Cala Homes (South) Limited v SSCLG* [2011] JPL 1458 and *Tesco Stores Ltd v Dundee City Council* [2012] 2 P.&C.R. 9.

- 5.73 More recently in *Corbett v Cornwall Council* [2020] the appeal court judge emphasised the importance of considering the plan as a whole when he said;

“Under section 38(6) the members' task was not to decide whether, on an individual assessment of the proposal's compliance with the relevant policies, it could be said to accord with each and every one of them. They had to establish whether the proposal was in accordance with the development plan as a whole. Once the relevant policies were correctly understood, which in my view they were, this was classically a matter of planning judgment for the council as planning decision-maker.”

- 5.74 Part 6 of the Localism Act (enacted in January 2012) requires Local Planning Authorities to have regard to local finance considerations (so far as material to the application) as well as

the provisions of the Development Plan and any other material considerations. The New Homes Bonus started in April 2011 and will match fund the additional Council tax raised for new homes and empty properties brought back into use, with an additional amount for affordable homes. The New Homes Bonus is as such an important consideration.

6.0 APPRAISAL

Principle of development

- 6.1 The application site is located outside of any defined built-up area boundary (BUAB) and is not allocated for development. It is therefore within the countryside in policy terms. The proposed development would be in conflict with the spatial strategy for housing within the development plan as set out in Policies, 2, 3, and 4 of the HDPF. However, the Council is currently unable to demonstrate a five-year housing land supply, and the policies are therefore not up-to-date. Little or no weight may be attributed to these policies.
- 6.2 Similarly, the Shaping Development in Horsham Planning Advice Note (SDPAN) (which sets out criteria which may support residential development outside the BUAB) has been recently adopted, this is not statutory planning and should not be given weight in the context of the significant shortfall in housing land supply. Furthermore, non-compliance with the SDPAN does not amount to a reason for an objection. It merely does not add weight in favour of the proposal. This is evident in the Council's approvals of permission at Potter's Fields

(Appendix NJA2) and Former Arun Feedmills (Appendix NJA3).

- 6.3 Notwithstanding the above, Policy 26 allows for some development in the countryside subject to certain criteria. The site is a brownfield site with lawful use for commercial purposes. It will be shown in this Statement that continued use and occupation of the site is no longer viable. Given the acute shortage of housing within the District and wider region, redevelopment for the purposes of housing would provide much needed dwellings through the efficient use of previously developed land.
- 6.4 The proposed dwellings would not be isolated. The term "isolated" is not defined within NPPF, but the courts have confirmed that it should be given its ordinary objective meaning of remote and far away from other places, buildings and people, and separate or remote from a settlement, services, and facilities. It was concluded in the Braintree Judgement that a settlement would not necessarily exclude a cluster of dwellings. The application site is located within close proximity to existing residential dwellings and other buildings. It is also not far from existing settlements and services.

- 6.5 The site is located approximately 2km from Barns Green to the northwest, defined as a medium village with moderate levels of services, facilities and community networks with some access to public transport under Policy 3 of the HDPF. It is also 4.5km from the built-up area of Southwater, which is defined as a Small Town and Larger Village. These are settlements with a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and/or bus services. The settlements act as hubs for smaller villages to meet their daily needs but also have some reliance on larger settlements/each other to meet some of their requirements.
- 6.6 The application includes a transport statement which details access to sustainable modes of transport and local service hubs. It notes that the nearest bus stop is situated some 500m to the west of the site, accessible in seven minutes on foot via a public footpath. There is a further bus stop at Coolham Road Junction 800m to the south. Both are within the 800m distance suggested by the Manual for Street for a comfortable walking distance and well below the guidance in the MfS and former PPG13 which details that walking can replace car trips under 2km. The bus stops provide access to bus routes 64, 74 and 74A providing access to Horsham, Storrington, Billingshurst and Christ's Hospital station, the nearest railway station.
- 6.7 Cycling may be more practical as the distances to local services. This would allow access to a school or post office within 8 minutes and around 20 minutes for supermarkets, pharmacies, dentist and Christ's Hospital railway station.
- 6.8 It is noted that development situated 1.5km from a settlement with less nearby nodes for sustainable transport was considered appropriate in the appeal allowed for a dwelling at Marlpost Meadows, Bonfire Hill, Southwater, West Sussex RH13 9BU (A PP/Z3825/W/22/3303603)
- 6.9 Furthermore, having regard to the commercial use, the proposal would reduce traffic generated by the application site and the impact of the proposal upon the local highway network.
- 6.10 For these reasons, the proposed dwellings would not be isolated dwellings, and the proposal does not therefore engage the considerations of paragraph 84 of the NPPF. The provision of rural housing on brownfield land would contribute to reducing acute local housing need and would support local

services and businesses. As such, it would amount to sustainable development of this rural area in accordance with Policy 26 4.

Design and character

- 6.11 Policies 25, 32, and 33 of the HDPF promote development that protects, conserves and enhances the landscape and townscape character from inappropriate development. Proposals should take into account townscape 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.
- 6.12 The site is within an area identified in the Horsham District Landscape Character Assessment 2003 as Landscape Character Area: G11 – Southwater and Shipley Wooded Farmlands. As noted in the Landscape Appraisal prepared by Ramsay & Co,

This is a well wooded landscape lying on the Weald Clay and Horsham Stone. The landform gently undulates with small streams in gentle valleys flowing down towards the Adur. Due to the enclosing presence of woodlands, views are confined. In the south there is a strong parkland influence with the clumps of parkland trees, mixed tree belts and lakes of Knepp Castle and West Grinstead Park dominating the landscape. Away from the A24 and A272 roads, the landscape is surprisingly remote. Occasional small farms nestle in the woodlands.

- 6.13 The site is well enclosed and constrained due to the farmstead arrangement and the dense woodland to the north. As such, visibility of the site within the area is limited to the site itself and the public footpath running through the site.
- 6.14 The existing development within the site is of poor quality and disparate design and appearance reflecting their history as former agricultural buildings which were then converted to commercial uses. They are somewhat random in their layout as they have been erected over time. Many feature asbestos panelling and they are in generally poor condition. The proposal would remove the buildings and would erect four new

dwellings reflecting a Sussex barn style appearance. The overall design approach and considerations are detailed within the accompanying Design and Access Statement prepared by STARC Architects.

- 6.15 The proposal would consolidate built form within the site, reducing the overall number of buildings present. The design would reflect that of the existing Sussex barn dwelling around which the existing commercial buildings are arranged, and the overall appearance of the dwellings and traditional external materials (including brick, oak and clay tiles) would be in keeping with the rural vernacular of this locality. The arrangement would reflect that of an existing farmyard with buildings somewhat loosely arranged around a central shared surface yard. The low stone walls and timber fencing along the plot boundaries would ensure that the development maintains a sense of openness when viewed from within.
- 6.16 The existing site is dominated by buildings and hard surfacing with woodlands adjacent to the north and west. The proposal would introduce considerable areas of planting and soft landscaping, which would soften the appearance of the dwellings and contribute to a more verdant setting sympathetic to the rural location. All but three trees would be retained and

there would be replacement planting to compensate for the loss of low quality trees within the site. Tree protection measures would be incorporated throughout the operational development phase to ensure trees may be successfully retained to ensure no loss of canopy cover.

- 6.17 The form, layout, scale and design of the proposed dwellings would relate sympathetically to the farmyard setting. The density and soft layout would conform within the context of this rural setting. It represents high quality design and would positively contribute to the character and appearance of the surrounding area in accordance with the HDPF policies.

Residential amenity

- 6.18 Policy 32 of the HDPF states that development will be expected to provide an attractive, functional, accessible, safe, and adaptable environment that contribute a sense of place both in the buildings and spaces themselves. Policy 33 continues that development shall be required to ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land.

- 6.19 The proposed development would be located within a former farmstead comprised of workshops and storage units for commercial use with dwellings to the east. The nearest dwellings would be the Sussex Barn and Heathfield House to the southeast.
- 6.20 Heathfield House is some 80m to the southeast of the proposed dwelling in Plot 1. Given the scale and design of that dwelling, the mass of Heathfield House's ancillary buildings between the two dwellings and proposed boundary treatments would ensure that the residential amenity of the neighbouring residents would not be harmed in relation to light, outlook or privacy.
- 6.21 The dwellings at plots 1-3 would be situated a minimum of 33m from Sussex Barn. Having regard the design and part single-part 1.5-storey form of the proposed dwellings and the landscaping/boundary treatments, these would not have a detrimental impact upon the light, outlook or privacy of residents of Sussex Barn.
- 6.22 The dwelling Plot 4 would be nearest to Sussex Barn. However, the section of the proposed dwelling closest to the neighbouring property would be some 20m distant, single storey and made up of the integral car port with windows oriented of the northwest away from Sussex Barn. As such, the new dwelling would not result in harm in the way of overlooking, overshadowing or overbearing impacts.
- 6.23 Although the development would be formed around Sussex Barn, the residential use and associated movement of people and vehicles around the neighbouring dwelling would be low scale and unlikely to result in adverse noise or disturbance. Moreover, this would be of lesser impact when compared to that which may arise from the existing commercial uses and the associated vehicular and other activity.
- 6.24 In addition, the layout of the proposal has been designed to provide sufficient spacing and appropriate orientation to ensure that future occupiers of the development do not suffer from overlooking, loss of privacy, loss of natural light, and overbearing impact.
- 6.25 For these reasons, it is considered that the proposed development would result in no adverse harm to the amenities of neighbouring properties and users of land, in accordance with the above policies.

Employment land

- 6.26 The site is located in the countryside and comprises a number of buildings in poor condition, making them unattractive for rental. This is supported by information and feedback from local commercial estate agents and surveyors as submitted with this application, which states:

The Property is currently in a severely dilapidated in condition and not currently suitable for occupation as business units, being that they would unlikely be capable of being let as they would likely not meet current Health and Safety standards nor to be of interest to occupiers due to its poor condition and significant initial inputs in cost to make suitable for use. It would require significant improvements in order to bring the buildings up to a useable and safe standard. We understand that the buildings likely contain asbestos containing materials, although we are not aware of the condition or whether any of the materials is damaged/disturbed. Being that there are hazardous materials within the buildings which already require significant works, the most effective and likely safest way would be to demolish these and to replace.

- 6.27 The supporting information also notes that market demand is stagnant, with subdued interest in recent months alongside rising vacancy rates, slowing demand and rising supply. This is reflected in the Council's own evidence prepared for its emerging Local Plan as noted in the appeal decision for appeal for proposed new business starter units at land adjacent to McVeigh Parker Ltd in Adversane (APP/Z3825/W/23/3328645, dated 14 May 2024), the Inspector noted that "figures provided by the Council indicate a general surplus of employment land within the district. This has been demonstrated in recent planning appeals elsewhere in the district." (emphasis added).
- 6.28 The McVeigh Parker appeal itself referenced an earlier appeal decision for outline permission for up to 9,825m² of Class E (Industrial Processes), B2, and B8 use floorspace with all matters reserved except for access at Land South of Hilland Farm (APP/Z3825/W/21/3288070). At that appeal, the Council and Appellant submitted evidence on the need for employment land. The decision letter, dated 14 February 2023, refers to the LPA submission of two Economic Growth Assessments (EGA) produced by Lichfields. The first, dated January 2020, covered Crawley Borough Council, Horsham District Council, Mid

Sussex District Council. The second, published November 2020, focussed on Horsham District in isolation. The Inspector noted a lack of precision regarding the data presented in the EGAs and a lack of certainty as employment land requirements were not broken down by use classes. He concluded, however that

“the Horsham EGA does provide two important conclusions. Firstly, that even using the scenario with the highest requirement, a surplus of 36,056 sq m of employment floorspace is predicted. Secondly, that the majority of employment job growth is likely to be in the office sector, with Class E (Industrial Processes) predicted to decline and Class B8 predicted to increase but by a lesser amount....

Overall, the quantitative and qualitative picture is opaque. A recent, robust EGA exists for the District which concludes there is a surplus of employment floorspace. However, relatively small changes in methodology or assumptions make significant changes to the employment need position, particularly when forecasting towards the end of the Local Plan period. Delivery, particularly of larger sites, is also

unclear. Nevertheless, there is a strong recent track record of employment floorspace being granted planning permission. All of the large sites may not yet be delivering but they are mostly the subject of active planning applications and their future construction is plausible. Importantly, the Development Plan policies, in combination, are clear on directing new employment development to sites within the built-up area. The appeal proposal is on an unallocated site outside of the built-up area. In this context, I would expect to see compelling evidence that there is a need for the proposed employment floorspace, and this is not before me, because of the uncertainties and conclusions I have set out above

- 6.29 Although the above appeals pertain to proposals for new development, this sets out that the loss of employment units within the site would not lead to harm given the lack of need for them and their present condition, which renders them unviable. Not only are they in poor condition, but there is a surplus of employment land with demand directed towards the larger centres such as Horsham, meaning that proposals for employment land in the countryside are not justified by need. The works required to revive the commercial use would not be

financially justified. The EGAs constitute the most recent evidence of employment land need for the District, and the letter from H Burt sets out further market information showing no improvement in demand and need since the appeals were determined.

6.30 As the Council has itself confirmed an oversupply of employment land, this undermines the requirement in Policy 9 requiring justification for the loss of employment land. It also demonstrates that the Policy is out of date and therefore should be given little weight.

6.31 Furthermore, it is noted that in granting permission for the redevelopment of the Former Arun Feedmills site, the Council made no objection to the loss of employment land and indeed did not require the applicant to justify the loss. In that case, the site was vacant, but there was an extant permission for the erection of eight two-storey B1 units to provide over 1200 sqm of commercial space (labelled as two-storey B1 units). The Planning Statement submitted in support of that application made clear that the extant permission was a material fallback position against which the proposed redevelopment should be assessed. Thus, there was a reasonable prospect of

preserving the site as employment land in the event of a refusal. Nevertheless, the Council raised no objection.

6.32 Therefore, although the Applicant considers Policy 9 is out-of-date, the loss of employment land within this site is justified having regard to their condition, evidence of lack of demand for these units and the greater benefit of providing housing within the site.

Highways and access

6.33 Policies 40 and 41 of the HDPF promote development that provides safe and adequate access, suitable for all users.

6.34 The proposed development makes use of the existing access from Trout Lane. The Transport Statement (TS) prepared by gta Civils and Transport notes that there is adequate visibility at the access to allow for the safe entrance and exit of vehicles to the Lane. Given the recorded speeds of 43mph northbound and 44mph southbound, the 95m and 120m visibility respectively would exceed distances detailed in the Manual for Streets 2.

6.35 Internally, the design and layout of the access would allow for safe movement and turning of vehicles, including large and

emergency vehicles as shown in the tracking plans in Appendix C of the TS. As such, vehicles could safely enter and exit the site in forward gear.

6.36 The TS advises that the proposed development would generate around 2 two-way vehicle trips in the weekday AM peak period (0800-0900) and 2 two-way vehicle trips in the weekday PM peak period (1700-1800). Overall, around 22 two-way daily weekday vehicle trips are forecast from the development. This level of traffic can be accommodated within the local road network, and it is noted that this is likely to reduce the overall traffic generated by the site having regard to the likely higher level of traffic which could be generated by the existing lawful commercial use of the site having regard to the size of the existing buildings.

6.37 Each dwelling would benefit from 2no. parking spaces within the proposed car ports with additional space within the private drives to accommodate a minimum of one space per plot. This would meet the adopted standard for four+ bedroom dwellings within PBZ Zone 2 as detailed in the West Sussex County Council Parking Guidance on Parking at New Developments. There is sufficient space within each plot and the central hard

surfaced area to accommodate the single visitor parking space necessary for a development of this scale.

6.38 In light of building control regulations as detailed in Approved Document S, each dwelling would include electric vehicle charging.

6.39 Drawing 100_05 details cycle storage to be provided at each plot. This would accommodate two secure spaces per dwelling, which would accord with the adopted standard.

6.40 In light of the above, the proposed development would not result in harm to highways safety or the capacity of the road network. Adequate parking and secure parking storage would be provided.

Natural Environment

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

- 6.42 Circular 06/2005 identifies that the presence of protected species is a material consideration when considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Therefore, it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed application, is established before planning permission is granted. Information on biodiversity impacts and opportunities should inform all stages of development, and an ecological survey is usually necessary where the type and location of development are such that the impact on biodiversity may be significant and existing information is lacking or inadequate.
- 6.43 The Preliminary Ecological Appraisal prepared by Arun Ecology details the habitats and species present within the application site. The vast majority of the site is covered in hard surface or buildings with small areas of modified grass or sparsely vegetated land. The proposal would significantly increase the level of soft landscaping and planting, which would positively enhance the environmental contribution of the application site to provide more areas of habitat, foraging and nesting/roosting. Additional ecological enhancements are recommended, and the development would be carried out in accordance with these measures.
- 6.44 As the buildings were deemed to have potential as bat roosts, the site has been subject to a bat emergence survey, and the associated report is included in the application submission. This concludes that two of the buildings to be demolished include bat roosts. To mitigate for this loss, it is recommended that two integrated bat boxes be installed in each dwelling alongside an additional two bat boxes to be installed in retained trees. This would ensure that the development does not lead to harm to bats roosting and foraging within the application site.
- 6.45 The site is within a bat sustenance zone although bat activity is limited to travel through the site given the existing site arrangement. The proposal would introduce some bat roosts and the greater level of planting within the site would better support bats and other species in future. External lighting would be limited, thereby reducing the potential impact upon bats, and this may be secured by condition.
- 6.46 The Arboricultural Impact Assessment prepared by Duckworths Arboriculture note that only three trees would be

removed. Two of these are category C trees, and the third is positioned very close to existing buildings and therefore likely to require removal. Replacement planting is proposed to ensure that the loss is mitigated.

Ancient woodland

- 6.47 The site is adjacent to an ancient woodland, and development operations would be situated outside this important designated habitat. Existing guidance sets out that development should not be carried out within 15m of the boundary of the ancient woodland to protect trees roots and understory planting. The proposed dwellings at Plots 2 and 3 would be situated within 15m of the boundary, but this would not warrant an objection in this case having regard to the existing site arrangement, which includes large structures and storage containers positioned directly adjacent to the edge of the ancient woodland. The proposal would remove these structures and introduce a greater gap between buildings and the ancient woodland with the introduction of soft landscaping and garden areas. This would positively benefit the root protection areas of trees in the ancient woodland as there would be less soil compaction and better flow of water in these areas.

- 6.48 In addition, the existing site arrangement does not provide protection of the ancient woodland from incursion. The proposed landscaping and boundary treatments would introduce a barrier between the site and the ancient woodland thereby offering greater protection of the habitat from human activity. This is vital to the protection of the understory area, which can be adversely affected by present activity.

- 6.49 Tree protection measures have been recommended in the AIA to ensure that development activity remains outside the ancient woodland thereby protecting the important understory and tree roots. The development would be carried out in accordance with these submitted reports and method statements, and this may be secured by condition.

- 6.50 Subject to the conditions noted, the proposal conserve and enhance the natural environment as required by local and national policies.

Biodiversity Net Gain (BNG)

- 6.51 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). The Biodiversity Gain Plan must show how the development will achieve the required minimum 10% BNG using the statutory biodiversity metric tool, and must demonstrate how the habitats will be managed and maintained for 30 years, starting from the date the development is completed. Off-site gains and significant on-site enhancements will be secured over this period by way of a Legal Agreement.

- 6.52 As noted, the proposal would lead to a considerable increase to soft landscaping and ecological enhancements when compared to the existing site arrangement. The Applicant has submitted a Biodiversity Metric prepared by Arun Ecology, which demonstrates that enhancements on-site would achieve the required 10% BNG. This may be secured by condition to ensure that the benefits remain in perpetuity.

Heritage

- 6.53 Sussex Barn, adjacent to the site, is a non-designated heritage asset (NDHA). The application includes a Heritage Report prepared by Chilcroft Heritage Planning. This notes that the significance of the building is linked to its age, form, fabric and position with the former historic farmstead. These elements

would not be materially affected by the proposed development. The existing buildings to be demolished are incongruous with the setting of NDHA with little consideration of their impact upon the building.

- 6.54 The proposal sets out a well-thought out development which would produce a small cluster of buildings with associated landscaping which would enhance the setting of the NDHA. The dwellings would interpret the sussex barn vernacular in a contemporary fashion. The resulting buildings would form a new more sympathetic farmstead setting to the benefit of the setting of Sussex Barn.

Drainage and flood risk

- 6.55 Policy 38 of the HDPF states that development proposals will follow a sequential approach to flood risk management, giving priority to development sites with the lowest risk of flooding and making required development safe without increasing flood risk elsewhere. Development should, among other things, utilise drainage techniques that mimic natural drainage patterns and manage surface water as close to its source as possible.

6.56 The site is located in flood zone 1, an area of low fluvial flood risk, and it is not identified as an area prone to surface water flooding. The proposed dwellings would incorporate drainage measuring in accordance with building regulations with due regard to sustainable urban drainage measures and the drainage hierarchy. The reduction of hard surfacing across the site would also have a beneficial impact upon surface water management within the site. As such, the proposal would reduce flood risk both within the site and the surrounding locality generally.

Contaminated land

6.57 Policy 24 of the HDPF states that developments will be expected to minimise exposure to and the emission of pollutants including noise, odour, air, and light pollution, and ensure that they address land contamination by promoting the appropriate re-use of sites and requiring the delivery or appropriate remediation.

6.58 Paragraph 187 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by preventing new and existing development far from contributing to, being put at risk from, or being adversely

affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land, where appropriate. Paragraph 196 continues that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.

6.59 The application includes a Preliminary Contamination Risk Assessment prepared by Environmental Assessment Services Ltd (dated September 2025) Given the historic uses of the land and buildings and the building fabric, the risk assessment concludes that there is some potential for contamination across the site. It recommends that removal of existing waste and asbestos containing materials from the site. Furthermore, a scheme for intrusive site investigation should be carried out prior to development to ensure that an appropriate remediation scheme can be agreed should this identify signification contamination.

6.60 These measures may be secured by appropriate condition, and the Applicant would ensure that development is carried out in accordance with the recommendations subject to which

the proposal would not result in harm to future occupiers by reason of contamination.

Climate change

6.61 Policies 35, 36 and 37 require that development mitigates to the impacts of climate change through measures including improved energy efficiency, reducing flood risk, reducing water consumption, improving biodiversity and promoting sustainable transport modes. These policies reflect the requirements of Chapter 14 of the NPPF that local plans and decisions seek to reduce the impact of development on climate change.

6.62 Should the application be considered acceptable, the following measures to build resilience to climate change and reduce carbon emissions would be secured by condition:

- Securing of SUDS and protection/improvement of green infrastructure
- Requirement to provide full fibre broadband site connectivity
- Refuse and recycling storage
- Biodiversity mitigation and enhancement

- Cycle parking facilities
- Electric vehicle charging points

6.63 Subject to these conditions the application will suitably reduce the impact of the development on climate change in accordance with local and national policy.

7.0 CONCLUSIONS

- 7.1 The application seek planning permission for the demolition of existing buildings and the erection of four detached dwelling with associated parking and landscaping arrangements at St Johns Farm. The application site is located outside the BUAB. However, it meets the requirements of Policy 26 of the HDPF as it would redevelop redundant commercial brownfield land/previously developed land in the countryside to provide much needed housing. As such, it amounts to sustainable development which would support the rural area whilst complying with other development plan policies. It is therefore acceptable in principle.
- 7.2 Although in the countryside, future residents would be able to access local services and sustainable transport within proximity of the site. Moreover, it allows for the provision of rural housing in a location which is not isolated and without encroachment into the countryside. Sites within similar settings have been assessed as such as noted in the appraisal section of this Statement. As such, the site is located within a sustainable location.

- 7.3 Notwithstanding the above, as the Council can demonstrate only a 1-year housing land supply, policies which might seek to restrict housing are not up to date and should be afforded very little weight given the acute shortfall in deliverable housing land supply. The appeal decisions appended to this Statement show that Inspectors are very clear in giving little weight to policies 1, 2, 3, 4 and 26 of the HDPF and to internal planning guidance/planning advice notes on this matter. (See appendices for decisions from Horsham Golf Course.)
- 7.4 Paragraph 11 of the NPPF states that decisions should apply a presumption in favour of sustainable development subject to certain balancing considerations. Paragraph 11(d)(ii) states that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, as is the case here, granting permission unless 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, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

- 7.5 With regard to protected areas, the site is adjacent an ancient woodland. Although development would be within the 15m buffer zone of that important habitat, it would nevertheless increase the buffer between development and the woodland when compared to the existing site arrangement. This coupled with the soft landscaping to be introduced to the site would in fact constitute an improvement to the conditions of the woodland area. Tree protection measures would also be sufficient to ensure that the woodland would be protected from construction activity. As such, there would be no harm to a protected area which would provide a strong reason for refusal.
- 7.6 The Statement also demonstrates that the proposal would comply with other planning policies. The proposed scheme would constitute a high quality design which would improve the character and appearance of the site and the local rural area. It would take previously developed land featuring low quality buildings in poor condition and introduce four sympathetic dwellings. There would be no harm to the amenities of neighbouring residents and future occupiers of the dwelling would benefit from satisfactory habitable accommodation and amenity space.
- 7.7 There would no harm to highway safety of the local highway network. The proposal would accord with building regulations thereby ensuring adequate drainage of surface water. The introduction of large area of planting and other ecological enhancements would ensure BNG is achieved to an appropriate level and that the local natural environment is conserved and enhanced.
- 7.8 The proposal would contribute four dwellings to local housing supply. Given the acute housing land supply shortage, the social benefits of the scheme should be given significant weight.
- 7.9 The proposal would lead to economic benefits in the short term arising from construction activities. Medium and long-term benefits would come from future residents support local services and shops. This should be given moderate weight in favour toe the existing arrangement.
- 7.10 As noted, the proposal would achieve BNG on site which brings environmental benefits.
- 7.11 The re-use of brownfield land for the provision of much needed housing therefore offers considerable benefits, and this

Statement illustrates that the proposal would not result in harm which would be contrary to development plan policies.

- 7.12 The proposal thus amounts to appropriate and sustainable development, and it is hoped that the Council will support the grant of permission.

APPENDICES – RELEVANT COUNCIL REPORTS AND APPEAL DECISIONS

NJA1 – Potters Field

NJA2 – Former Arun Feedmills

NJA3 – Marlpost Meadows

NJA4 – McVeigh Parker

NJA5 – Land S of Hilland Farm

NJA6 – Horsham Golf Course