



Applications & Appeals Services
The Beehive, City Place, Gatwick, RH6 0PA
Tel: 01403 252231 email: njaltd@gmail.com

Mr Jacques Burrowes
Planning Department
Horsham District Council
Albery House
Springfield Road
Horsham
West Sussex
RH12 2GB

Ref: 21/138

09 June 2026

OBJECTION LETTER

Dear Mr Jacques Burrowes,

LPA Ref: DC/26/0784
Proposal: Change of use from dwellinghouse (Class C3) to veterinary practice (Class E).
Site: 1 Woodcot, New Road, Billingshurst, West Sussex, RH14 9DS

NJA Town Planning Ltd has been instructed in connection with the above planning application on behalf of the owners and occupiers of No.2 Woodcot, the semi-detached dwelling attached to No.1 Woodcot to the west. They strongly object to the proposed development at No.1 Woodcot for the reasons set out within this letter:

Planning Policy

The key planning policies relevant to the proposal are set out within the National Planning Policy Framework (NPPF) (2024) and the Horsham District Planning Framework (HDPF) (2015).

Relevant national policy includes Section 9 (Promoting Sustainable Transport) and Section 12 (Achieving Well-Designed and Beautiful Places) of the NPPF. At the local level, particular regard should be had to HDPF Policies 26 (Countryside Protection), 32 (The Quality of New Development), 33 (Development Principles), 40 (Sustainable Transport) and 41 (Parking), which seek to ensure that development is appropriate to

its surroundings and does not result in unacceptable impacts on neighbouring occupiers, highway safety or parking provision.

The relevant planning policies are referred to where necessary in the following assessment of the proposal.

Principle of Development

As set out within the submitted Planning Statement prepared by WPS Planning the Applicant relies heavily on rural economic development policies and claims the use is intrinsically linked to the countryside and equine sector. However, the proposal is not for an agricultural or equestrian facility but a commercial Class E use within a residential semi-detached property in a rural area. The proposal would result in the loss of an existing dwelling and its replacement with a commercial use in a location whose prevailing character is a group of loose knit residential properties in a rural area. The assessment repeatedly compares the proposal to a small office use; however, planning permission is sought for a veterinary practice under Class E and the application must be assessed on that basis.

As the site lies outside the built-up area boundary, the proposal must be assessed against Policy 26 (Countryside Protection), which requires development to be essential to its countryside location and not result in a significant increase in the overall level of activity in the countryside. The proposal has not demonstrated that a veterinary business requires this particular countryside location, nor that the introduction of staff, business vehicle movements and commercial activity would comply with the policy's requirement to protect rural character.

The proposal also conflicts with the spatial strategy established by Policies 1 (Sustainable Development) and 3 (Development Hierarchy and Settlement Expansion) of the HDPF, which direct development to sustainable locations and seek to manage the distribution of development across the District. Furthermore, the loss of an existing dwelling is contrary to the objective of maintaining the District's housing stock and should be afforded significant weight in the planning balance particularly given Horsham District Council's extremely low housing supply.

Whilst the Applicant repeatedly characterises the use as "low intensity", the operation would accommodate five employees together with veterinary vehicles, deliveries and associated commercial activity.

No Transport Statement, parking assessment, trip generation analysis, noise assessment or operational management plan has been submitted to substantiate the assertion that impacts would be negligible as suggested. In the absence of such evidence, the Local Planning Authority cannot reasonably conclude that the proposal would not result in an unacceptable increase in activity, harm to neighbouring amenity, parking pressures or transport impacts, contrary to Policies 26, 33, 40 and 41 of the HDPF. This is discussed further below.

Impact on the Residential Amenity

The application site shares a party wall with No. 2 Woodcot as well as having adjoining front driveways and rear gardens. The site is also in very close proximity to multiple residential dwellings on the southern side of New Road. As such, the proposal must be assessed particularly carefully against Policy 33 (Development Principles) of the HDPF, which requires development to respect the character and amenities of the surrounding area and avoid unacceptable impacts on neighbouring occupiers. The proposal must also satisfy Policy 32 (The Quality of New Development) which seeks to ensure development integrates successfully with its surroundings and provides a safe and attractive environment, together with Policies 40 (Sustainable Transport) and 41 (Parking), which seek to ensure that development does not give rise to unacceptable transport, parking or associated amenity impacts.

The Applicant has not provided any evidence in relation the impact on the amenity of No.2 Woodcot or other surrounding properties, it simply asserts that there will be no amenity impacts but has submitted no noise assessment and no evidence regarding:

- Staff arrivals and departures;
- Veterinary vehicle movements;
- Delivery and collection activity;
- Pharmaceutical deliveries;
- Clinical waste collection;
- Potential out-of-hours emergency call-outs;
- Noise transmission through the shared wall;

- The occupation of upper floor rooms identified as office, pharmacy and staff accommodation.

The application therefore provides no robust evidence to demonstrate that the operation of a commercial veterinary business within a semi-detached residential dwelling would not adversely affect the living conditions of the occupiers of No. 2 Woodcot and other local properties.

Furthermore, the Planning Statement places considerable reliance on the assertion that the proposal will operate as a low-intensity staff base with no visiting clients or animals *“The building will not operate as a drop-in or appointment-based for visiting clients, and there will be no routine attendance by members of the public with animals”*. However, planning permission is sought for a veterinary practice falling within Use Class E, not for a private office use. Once the principle of a Class E veterinary use is established, the permission could facilitate a significantly more intensive operation than that assessed within the Planning Statement.

In particular, Use Class E permits the provision of medical or health services to visiting members of the public where appropriate to the locality. Whilst the current Applicant states that no client visits are proposed, there is no mechanism currently before the Council which would permanently prevent future client appointments, consultations, longer opening hours, additional staff, increased vehicle movements or a more intensive veterinary operation. The Local Planning Authority must therefore assess the proposal on the basis of the permission sought and its reasonable planning consequences, rather than solely on the Applicant's present business intentions.

Given the shared party wall with No. 2 Woodcot, the absence of technical evidence and the potential for a more intensive Class E operation in the future, it has not been demonstrated that the proposal would preserve residential amenity in accordance with Policies 32, 33, 40 and 41 of the HDPF.

The proposal also conflicts with paragraph 135(c) and (f) of the NPPF, which require development to be sympathetic to local character and to secure a high standard of amenity for existing and future users; in the absence of robust evidence regarding

noise, activity levels, parking and operational impacts, it has not been demonstrated that these objectives would be achieved.

Impact on The Character of the Area

The Applicant places significant weight on the fact that the building would retain its residential appearance. However, the issue is not simply one of visual appearance. Policies 32 (The Quality of New Development) and 33 (Development Principles) require development to respect local character, integrate successfully with its surroundings and safeguard the amenities of neighbouring occupiers.

The proposal would result in the loss of a dwellinghouse and the introduction of a commercial veterinary use within one half of a pair of semi-detached dwellings located within a predominantly residential environment. Whilst limited external alterations are proposed, the operational character of the site would fundamentally change from residential to commercial. The introduction of staff, veterinary vehicles, deliveries and associated business activity would erode the established residential character of the area and would be at odds with the expectations of occupiers of adjoining properties.

Furthermore, given the site's countryside location, the proposal would also fail to accord with the objectives of Policy 26 (Countryside Protection), which seeks to ensure development remains appropriate in scale and does not result in an unacceptable increase in activity within the countryside. Accordingly, the proposal conflicts with Policies 26, 32 and 33 of the HDPF.

Highways and Parking

Policies 40 (Sustainable Transport) and 41 (Parking) of the HDPF require development to be appropriately located, avoid unacceptable impacts on the highway network, and provide adequate parking having regard to highway safety and residential amenity. Policy 41 further requires that sufficient parking and associated facilities are provided to meet the needs of anticipated users.

The application is unsupported by any Transport Statement, parking survey, vehicle tracking information or evidence demonstrating that sufficient parking can be accommodated on-site. The Applicant simply asserts that parking demand will be low

and that vehicle movements will be modest, however no evidence has been submitted to substantiate these claims.

The proposed operation would accommodate five employees together with veterinary vehicles operating from the site. In addition, the proposal is likely to generate deliveries, collections, servicing requirements and other business-related vehicle movements, particularly from the pharmacy. Given the absence of any detailed parking or transport assessment, there is significant concern that the proposal could result in overspill parking, increased vehicle movements, manoeuvring conflicts and additional pressure on a road that primarily serves residential properties.

Furthermore, whilst the Applicant states that no visiting clients are proposed, as set out above, no planning mechanism has been put forward to secure this restriction. The Local Planning Authority must therefore consider the reasonable planning consequences of the use proposed. In the absence of robust evidence demonstrating otherwise, it has not been shown that the proposal would avoid adverse impacts on highway safety, parking provision or residential amenity. The proposal therefore fails to demonstrate compliance with Policies 40 and 41 of the HDPF.

Summary

Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) Planning and Compulsory Purchase Act 2004 require planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this case, the proposed development does not comply with the relevant policies of the NPPF and the Local Plan in respect of principle of development, impact on residential amenity, impact on character of the area, and from a highways and parking perspective.

The proposal would result in the loss of an existing dwelling and the introduction of a commercial use within one half of a pair of semi-detached dwellings in a predominantly residential location. Whilst the Applicant repeatedly characterises the proposal as a low-intensity operation, no Transport Statement, parking assessment, trip generation analysis, noise assessment or operational management plan has been submitted to substantiate the assertion that impacts would be negligible.

Particular concern arises from the site's relationship with No. 2 Woodcot, with which it shares a party wall. The application provides no robust evidence to demonstrate that the operation of a veterinary business from the property would not result in unacceptable impacts on neighbouring residential amenity through staff movements, vehicle activity, deliveries, servicing requirements, noise transmission or future intensification of the use.

Furthermore, whilst the Applicant states that no visiting clients or animals would attend the premises, no planning mechanism has been proposed to secure these restrictions. The Local Planning Authority must therefore assess the application on the basis of the veterinary practice use (Class E) applied for and its reasonable planning consequences, rather than solely on the Applicant's current business intentions.

The proposal would also introduce a commercial use that is out of keeping with the established residential character of the area and has not been demonstrated to avoid adverse impacts in relation to parking provision, highway safety or the wider character of the countryside. It is clear that the conversion of a semi-detached house to a commercial use is not a desirable form of development compounded by the site's rural location.

For the reasons set out above, it is respectfully requested that Horsham District Council refuse planning permission for the proposed development.

Yours sincerely



**Nikolas J. Antoniou
BSc HONS DIPTP MRTPI
Chartered Town Planner
For and on behalf of NJA Town Planning Ltd**