

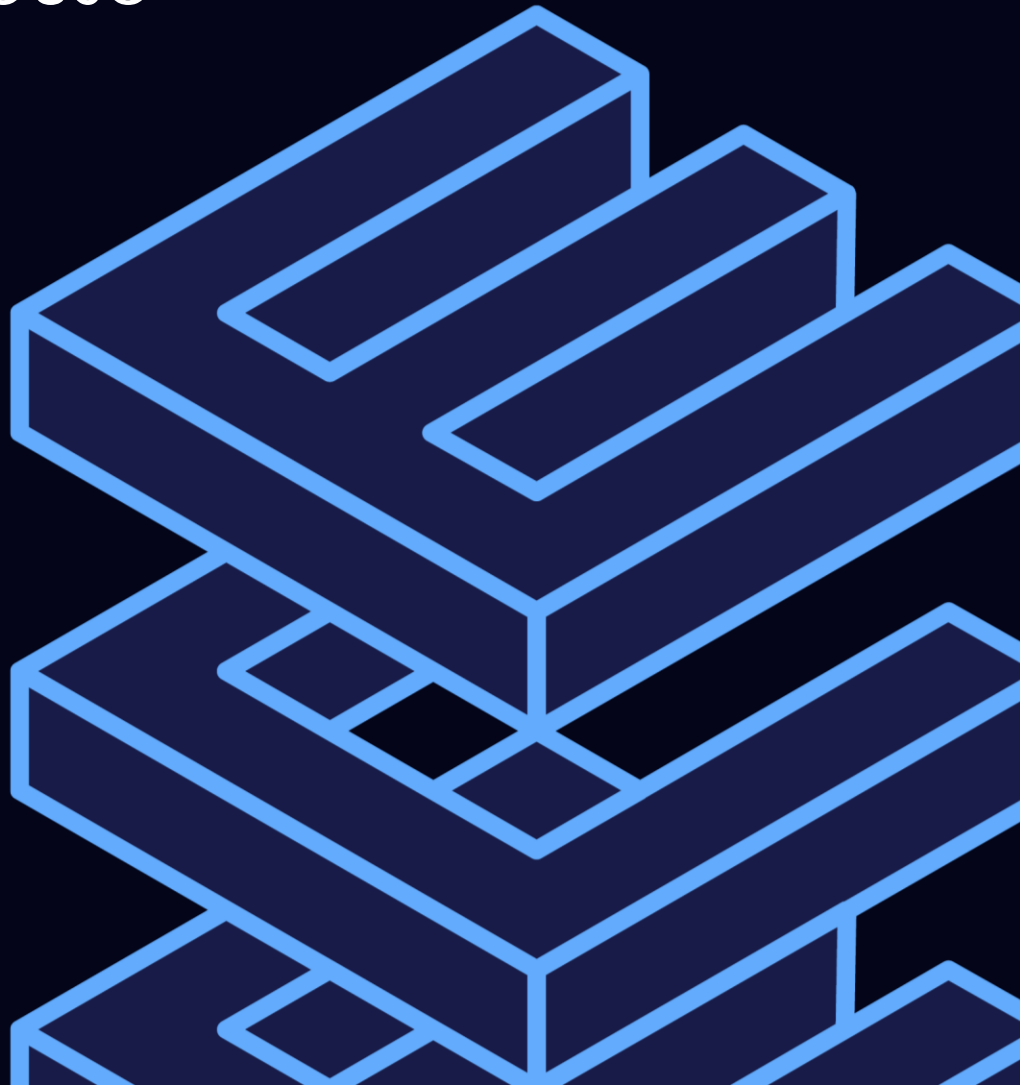


ECE Planning

Planning, Heritage, Daylight, and Sustainability Statement

Envision House

June 2026



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Project Name: Envision House – Rooftop Extension

Location Envision House, 5 North Street, Horsham,
West Sussex, RH12 1XQ

Client: GBD Developments LLP

File Reference: P2353i

Issue	Date	Author	Checked	Notes
PL01	23/06/2026	J Chan	C Barker	Initial Draft
PL02	25062026	J Chan	C Barker	Planning Issue

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1. Introduction

- 1.1. This statement has been prepared on behalf of GBD Developments LLP in support of a Full Planning Application at the Third Floor of Envision House, 5 North Street, Horsham, West Sussex, RH12 1XQ for:

'Extensions and alterations to existing property, including extensions to roof to provide for 4 no. 2-bedroom flats and 1 no. 1-bedroom flats; and associated works. (Revisions to DC/26/0716)'

- 1.2. This application follows on from submission of Prior Approval application DC/26/0716 for the 'Change of Use of Class B1a Offices (First and Second Floors) to form 18 residential units (5 x 1 bed flats, 13 x 2 bed flats (Use Class C3))', and in parallel seeks permission for additional units within the roof space of Envision House.
- 1.3. This application also stands as a resubmission following the lapse of permission under reference DC/15/0757. That permission received approval in 2015, but was not implemented.
- 1.4. This statement sets out below an overview of the site and proposals, relevant planning history and legislation, and an appraisal of the relevant planning matters under consideration.

2. The Site

- 2.1. The application site comprises approximately 0.08 hectares of land situated on North Street, on the eastern periphery of Horsham town centre. The site occupies a strategic position adjacent to the primary retail and commercial core. Its immediate context is defined by the small-scale leisure and retail development to the south and west, the mid-rise Spire Court office building to the east, and the roundabout and major roadway of Albion Way to the north.
- 2.2. The site benefits from a high level of accessibility to sustainable transport modes. It is well-served by local bus routes and is located within 600 metres of Horsham railway station, which provides frequent direct services to London and the South Coast.
- 2.3. The site is currently occupied by 'Envision House,' a three-storey semi-detached building featuring a small fourth-floor plant and access structure set back from the principal elevation. The existing building provides a mix of ground-floor commercial space, upper-floor office accommodation, and roof-level plant. Vehicular access and associated car parking are provided to the rear, via Medwin Way. The building is finished in a palette of red brick and timber boarding, under a clay-tiled roof, with active timber-and-glass frontages at the ground floor.
- 2.4. Immediately adjacent to the site's eastern boundary lies the Horsham Town Centre Conservation Area. Directly abutting this eastern boundary are the curtilages of the buildings at Carfax. There are several Grade II Listed buildings and structures in the immediate vicinity of the site. These include 25 Carfax; 26, 26A and 27 Carfax; the Bandstand at Carfax; and the Horsham Carfax War Memorial.
- 2.5. The nearby Bridges Memorial Spire, also known as the former St Mark's Church Spire, lies on the opposite side of north Street. This may be considered a locally listed asset owing to its mention within the Horsham Town Centre Conservation Area Appraisal and Management Plan, despite not lying within the Conservation Area itself.

3. Planning History

3.1. The following Planning History is considered of relevance to this application.

DC/14/1880 – Change of use from offices (Use Class B1a) to form 18 residential units (5 x 1 bed flats, 13 x 2 bed flats (Use Class C3) Prior Notification. (Prior Approval Required and Permitted 27 October 2014)

DC/15/0757 - Extensions and alterations to existing property, including extensions to roof to provide for 4 no. 2-bedroom flats and 1 no. 1-bedroom flats; and associated works. (Revisions to DC/14/1880). (Approved 30 June 2015)

3.2. The above applications demonstrate that a Change of Use from commercial to residential and full planning for a rooftop extension to include 5no. residential dwellings has previously been approved for the building. However, these permissions expired before being implemented.

DC/26/0716 - Prior Notification for Change of Use of Class B1a Offices (First and Second Floors) to form 18 residential units (5 x 1 bed flats, 13 x 2 bed flats (Use Class C3). (Currently under consideration)

3.3. Concurrently to this application, prior approval is being sought again for a conversion of the first and second floors of Envision House to residential use.

4. The Proposal

- 4.1. This application seeks full planning permission for the construction of a rooftop extension at Envision House to accommodate 5 no. residential apartments.
- 4.2. The proposed development is intended to be implemented alongside the residential conversion of the first and second floors of the building, which is currently under consideration as part of a concurrent Prior Approval application (Ref: DC/26/0716).

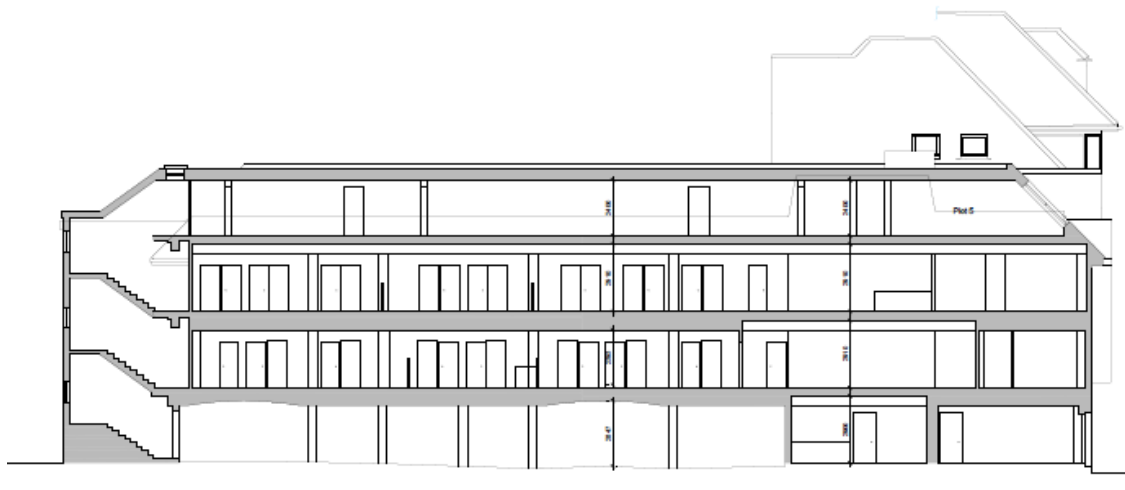


Figure 1 - Proposed section demonstrating altered roof form

- 4.3. The proposed works are to involve the removal of the building's existing flat crown roof, including the projecting flat-roofed plant room and associated metal flashing. In its place, a new, raised roof form will be constructed to accommodate the new habitable floor space, with natural light and ventilation for the proposed rooftop apartments provided via the installation of roof lights. To facilitate access to the new rooftop level, the proposal also includes a minor vertical extension to the existing rear staircase enclosure, with the architectural form, external treatment, and finishing materials matching those of the existing building.

5. Policy Overview

5.1. Introduction

- 5.1.1. At the heart of the planning framework are Statutory Development plans, which seek to guide the decision-making process. Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires, that where the Development Plan contains relevant policies, an application for planning permission shall be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.1.2. In this case, the relevant Development Plan comprises the Horsham District Planning Framework (2015).
- 5.1.3. The National Planning Policy Framework (The Framework), the Planning Practice Guidance (PPG) and Supplementary Planning Guidance are material considerations, together with local guidance documents.
- 5.1.4. It should be noted that the adopted Horsham District Planning Framework is currently out of date by reason of it being over 5 years old. The Government require all Local Authorities to review the Local Plan every five years and therefore the Council are currently in the midst of preparing a new Local Plan for the District. Please refer to the below paragraph for further information.

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

- 5.2.1. The Horsham District Local Plan (2023-2040) is currently undergoing Independent Examination (Regulation 24). Following a period of delay in 2025 to address soundness concerns, a new Inspector was appointed and formal examination hearings recommenced in April 2026. The Plan is presently being amended via a series of suggested Main Modifications, and significant matters, including the Spatial Strategy and Site Allocations, remain subject to upcoming hearing sessions.
- 5.2.2. It should also be noted that Horsham District Council have commenced the preparation of the new-style Horsham District 2045 Local Plan in line with national guidance on the proposed changes to the local plan adoption process. This will be happening at the same time as the Council's consultation on main modifications to its Horsham District 2023-2040 Local Plan that is still undergoing examination by the Planning Inspector.
- 5.2.3. In accordance with paragraph 48 of the NPPF, because these plans are still subject to unresolved objections and the examination process is ongoing, the policies within the emerging Local Plans should currently be afforded only limited weight in the determination of this application.

5.3. National Planning Policy Framework (NPPF)

- 5.3.1. The NPPF was adopted in 2012 with many revised versions, the most recent of which being updated in February 2025. The NPPF sets out the Government's planning policies for England and how these should be applied. The relevant sections of the NPPF in relation to this application are summarised below and explored in further detail later in this Statement.
- Chapter 2 (Achieving Sustainable Development)
 - Chapter 5 (Delivering a Sufficient Supply of Homes)

- Chapter 7 (Ensuring the Vitality of Town Centres)
- Chapter 9 (Promoting Sustainable Transport)
- Chapter 11 (Making Effective use of Land)
- Chapter 12 (Achieving Well-Designed Places)
- Chapter 14 (Meeting the Challenge of Climate Change, Flooding and Coastal Change)
- Chapter 16 (Conserving and Enhancing the Historic Environment)

5.4. National Planning Practice Guidance (NPPG)

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

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

- 5.5.1. The Horsham District Planning Framework (HDPF) was adopted in November 2015 and is the overarching planning document for Horsham District outside the South Downs National Park (SDNP) and replaces the Core Strategy and General Development Control Policies documents which were adopted in 2007.
- 5.5.2. Although the HDPF is out of date by reason of it being over 5 years old, the following policies are considered to be relevant to the application and have been given full consideration in the preparation of this application, as explored in further detail later in this Statement.
- Policy 1 (Sustainable Development)
 - Policy 3 (Development Hierarchy)
 - Policy 5 (Horsham Town)
 - Policy 15 (Housing Provision)
 - Policy 16 (Meeting Local Housing Needs)
 - Policy 32 (The Quality of New Development)
 - Policy 33 (Development Principles)
 - Policy 34 (Heritage Assets and Managing Change within the Historic Environment)
 - Policy 37 (Sustainable Construction)
 - Policy 40 (Sustainable Transport)
 - Policy 41 (Parking)

5.6. Shaping Development in Horsham District

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

6. Planning Appraisal

6.1. Principle of Development and Housing

- 6.1.1. The principle of development and the contribution toward local housing need are firmly established. The proposal seeks to provide 5no. high-quality dwellings on a sustainably located brownfield site, optimizing the building's footprint through an upward extension.
- 6.1.2. Horsham District is currently experiencing a significant shortfall of housing delivery, with the current 5 Year Housing Land Supply figure sitting at just 1 year as of November 2025 (APP/Z3825/W/25/3365004). In the absence of a sufficient Housing Land Supply, the tilted balance is considered to apply in favour of sustainable development. The proposal is also well supported through its planning history, with permission under reference DC/15/0757 having previously demonstrated that the site is suitable for a rooftop extension identical to that currently proposed providing an addition 5 residential units.
- 6.1.3. It should be noted that the proposals relate to the additional residential units and associated access only. Any loss of business space (Use Class E) is for consideration under Prior Approval Application DC/26/0716 and consequently falls outside of the remit of this application. As such this application is not considered to result in the displacement of any existing town centre uses.
- 6.1.4. Considering the above, the proposals are considered to be entirely acceptable in relation to the principle of development and housing.

6.2. Heritage and Design

- 6.2.1. With regard to design, scale, and massing, the extension is designed to be a minimal and sympathetic addition that improves the host building's profile. By replacing the existing, discordant plant room and metal flashing with a traditional roof form, the development creates a more harmonious relationship with the pitched roofs of adjacent properties. This represents a visual enhancement to the street scene and ensures the proposal preserves and enhances the character of the area.
- 6.2.2. The site lies directly adjacent to the Horsham Conservation Area, abutting the curtilage of the properties at 18-24 Carfax. A search of Historic England's HER Heritage Gateway has also been undertaken and revealed the following Grade II Listed buildings within 100 metres of the site:
- 25 Carfax (ref. 1027497)
 - 4 Carfax (ref. 1027537)
 - 26, 26A and 27 Carfax (ref. 1027539)
 - 36 Carfax (ref. 1027540)
 - 33,34, 34A and 34C Carfax (ref. 1191505)
 - The Bandstand at Carfax (ref. 1191536)
 - 14 Carfax (ref. 1287055)
 - The Horsham Carfax War Memorial (ref. 1420856)
- 6.2.3. The Bridges Memorial Spire, also known as the former St Mark's Church Spire, lies on the opposite side of north Street and may also be considered a locally listed asset owing to its mention within the Horsham Town Centre Conservation Area Appraisal.
- 6.2.4. The development should therefore be assessed for its impact on the setting of these identified heritage assets.

- 6.2.5. The principal heritage interest of Carfax lies in its long-established role as Horsham's historic market and civic focus, expressed through the surviving open central space, the converging historic street pattern, and the enclosing historic frontages. The heritage designations around the space collectively reflect the area's development from a medieval and post-medieval market town into a formal eighteenth- to early twentieth-century urban centre. Their significance is derived primarily from their scale, varied but traditional roofscapes, materials, detailing, and their collective contribution to key views into and across Carfax.
- 6.2.6. The Carfax Bandstand, the Horsham Carfax War Memorial, and the Bridges Memorial Spire provide important focal points and architectural landmarks within this setting, with their heritage value drawing upon their relationship to the wider townscape. Consequently, from a heritage and conservation perspective, the principal considerations relate to the preservation of the area's open character, historic sense of enclosure, and general roofline profile, rather than the rigid preservation of an unchanged visual state.
- 6.2.7. The proposals, in maintaining the slope angle of the existing roof, are therefore not considered to have a significant impact on the heritage and conservation value of these assets. Specifically, their value derived from the formation of the area's open character, sense of enclosure, and contribution to key views are considered to be minimally impacted in such a way as to result in no harm. The impact on the roofscape of the Conservation area and wider context as a whole are considered to be minimal, resulting in harm on the lower end of less than substantial.
- 6.2.8. This conclusion is supported by the evaluation of the lapsed planning permission for the site (DC/15/0757). In that case, the officer's report noted that the amendments made to the previously refused scheme *'result in the reduction in the impact of the additional floor on the visual amenity of the street scene and the character of the conservation area'* and that the *'size and bulk or the visual impact is not so significant as to warrant a refusal'*. Given that the current proposals are identical in scale, massing, and materials, they are considered to result in an equally acceptable impact on balance.



Figure 2 - Illustration of the amended roof form

- 6.2.9. It is therefore asserted that the amended roof form has a very minimal impact on the setting of the Conservation Area and other heritage assets. If the council are of the opinion that that it results in harm, we argue that this would fall on the lower end of the scale of less than substantial harm. When taken on balance, any potential harm should be outweighed by the benefits of much needed additional housing within the district.

6.3. Residential Amenity and Daylight

- 6.3.1. The impact on residential amenity has been carefully managed through the use of roof lights instead of dormers, ensuring no adverse overlooking of neighbouring properties. The internal layout is designed to provide high standards of daylight and sunlight for future occupants, while the overall massing ensures that the extension does not appear overbearing or result in a significant loss of light to adjacent buildings.
- 6.3.2. Figure 3 below shows an indicative section diagram extrapolated from section CC (see Figure 4) as seen in drawing 7718-130-P1. This demonstrates the angle of vertical sky component of a typical window at first floor level of the neighbouring properties at Carfax. This has been drafted on the understanding that the ground floor of the properties at Carfax is in non-residential (commercial) use only, and the assumption of the centre of a residential first floor window being at 4.5m above ground level.

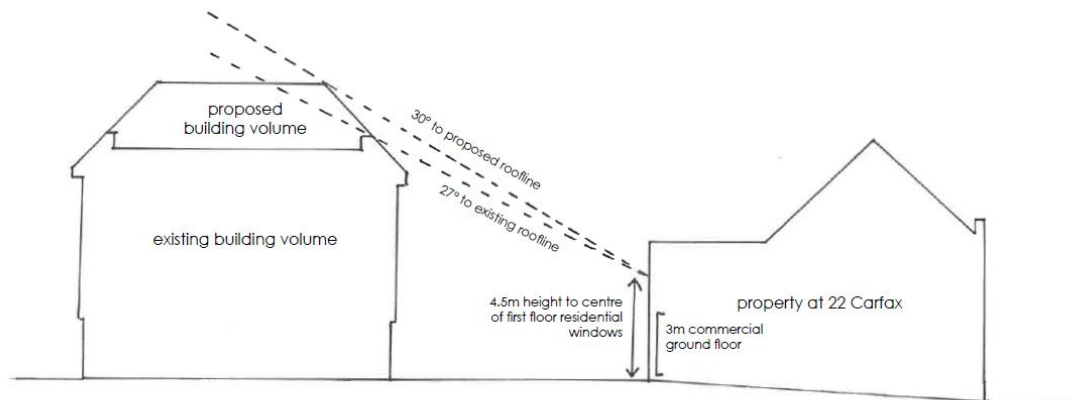


Figure 3 - Diagram demonstrating vertical sky component of neighbouring property at 22 Carfax

- 6.3.3. This demonstrates that the obstructed angle from the horizontal is increased by only 3 degrees (from 27 to 30 degrees). This therefore marks an only 4.7% decrease in vertical sky component. For the purposes of assessing daylight impacts, this decrease is considered to result in only a minimal impact on these properties.
- 6.3.4. Furthermore, the residential windows potentially effected by the development all lie to the south-west of envision house, and are north-east facing as demonstrated in Figure 4 below. They do not receive any direct sunlight with envision house in its current state, and as such there is no reason to assess the proposals in terms of sunlight impacts. This assessment has therefore only considered daylight impacts, which for the reasons stated above are considered minimal.

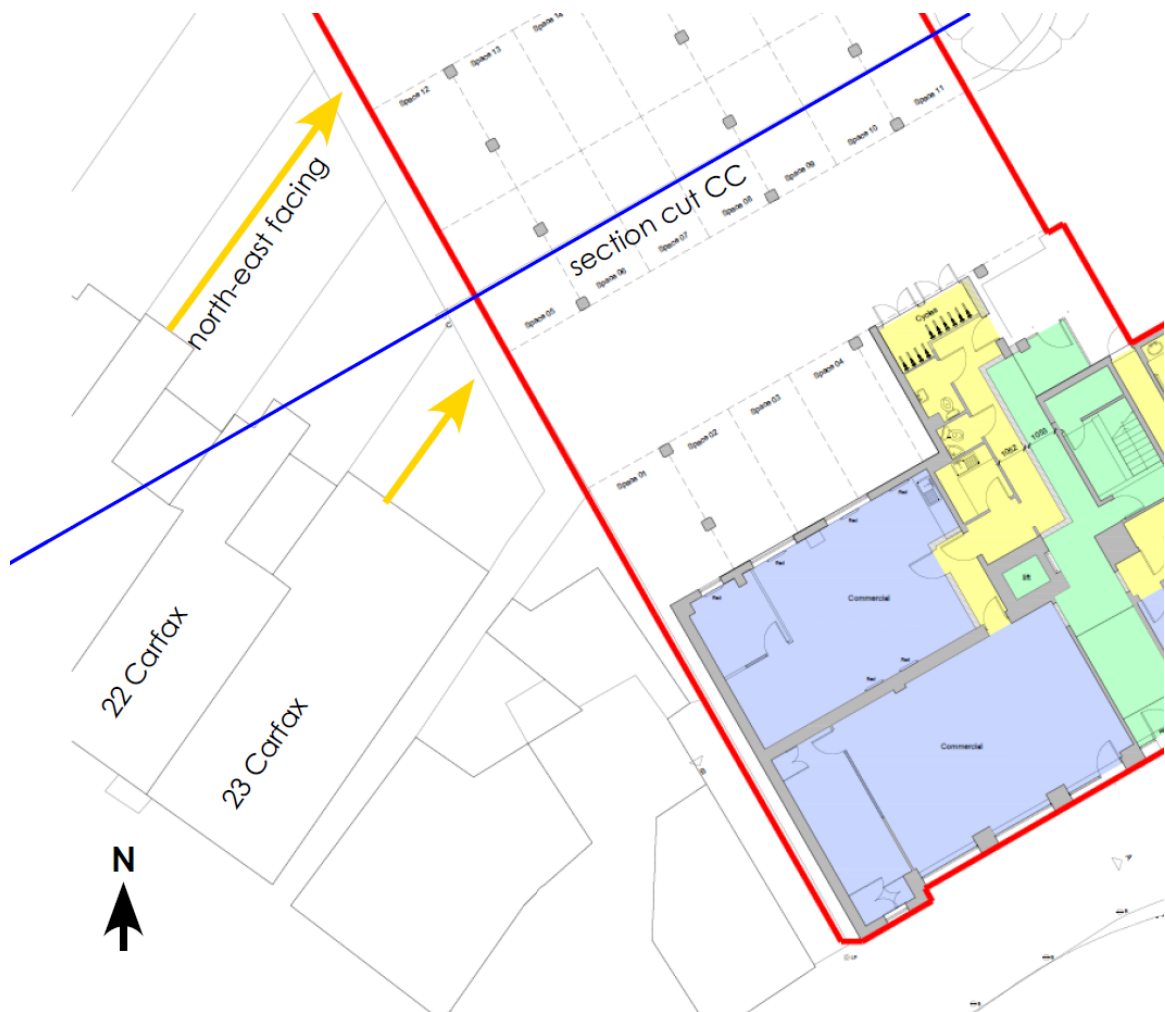


Figure 4 - Plan showing location of section cut CC and facing of properties at Carfax

- 6.3.5. It should also be noted that for the previously approved and lapsed permission (DC/15/0757), the officers report concluded that the 'size and bulk or the visual impact is not so significant as to warrant a refusal'. With this application being identical in massing, this statement should still hold true and the proposal be acceptable on balance with respect to daylight impacts and neighbouring amenity.

6.4. Sustainability

- 6.4.1. From a fabric and resource-efficiency perspective, the proposed development will incorporate double-glazed rooflights to the new apartments, improving thermal performance and helping to reduce operational energy demand for space heating. Furthermore, dual-flush WCs will be specified to minimise potable water consumption. These measures will assist in meeting relevant energy and water efficiency standards, directly supporting local policy aims under Policy 33 of the Horsham District Planning Framework.
- 6.4.2. The rooftop extension represents an inherently resource-efficient method of delivering new housing. The exact details of the sustainability measures can be secured by planning condition, or Building Regulations can be relied upon to address all matters identified by Policy 37 of the Horsham District Planning Framework. The proposals are therefore capable of meeting all sustainability requirements, subject to the relevant regulatory measures

(including conditions) being put in place, and are therefore acceptable in sustainability terms.

6.5. Transport and Parking

- 6.5.1. In terms of traffic and transport, the site occupies a highly sustainable town-centre location with excellent access to public transport and local amenities. The proposal encourages sustainable travel patterns, and the arrangements for access remain as previously approved, ensuring no detrimental impact on the local highway network.
- 6.5.2. The West Sussex Guidance on Parking at New Developments identifies the development as within Parking Behaviour Zone 5, and would consequently require a total of 5 parking spaces in line with requirements. However, we argue that for a small scheme such as this in a town centre location with excellent access to public transport, a more minimal provision of parking would be appropriate and remains in line with NPPF Paragraphs 110-112. The existing parking provision of Envision House, with 21 vehicle spaces for the entire building, is therefore considered entirely appropriate alongside the designated bicycle parking spaces within the curtilage of the development.

7. Conclusion

- 7.1. In summary, this application seeks a new full planning permission for extensions and alterations to existing property, including extensions to roof to provide for 4 no. 2-bedroom flats and 1 no. 1-bedroom flats, and associated works at Envision House, 5 North Street, Horsham, RH12 1XQ.
- 7.2. As demonstrated throughout this statement, the proposed development has been carefully assessed against all relevant national and local planning policies. The principle of development is firmly established, supported by a strong planning history and the pressing need for housing within the district. Matters of design, heritage, residential amenity, and transport have each been carefully considered and found to be acceptable; the revised roof form representing a positive improvement to the building's profile and its relationship with the surrounding Conservation Area, while the sustainable town-centre location and existing parking provision are considered well-suited to a development of this nature.
- 7.3. On balance, the proposal represents a high-quality and sustainable use of an underutilised site, delivering much-needed housing in a highly accessible location. Taking all relevant planning matters into consideration, the proposals are considered on balance to be entirely acceptable.

