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Horsham  
RH12 2GB

4 August 2026

By email to: [planning@horsham.gov.uk](mailto:planning@horsham.gov.uk)

Dear Hannah

**Re: DC/26/1207: Proposed Erection of a self-build dwelling and detached garage with new vehicle access from Black Gate Lane and associated driveway/car parking.**

I am writing on behalf of the owner and occupant of Whitehall Cottage, [REDACTED] to set out a range of concerns in respect of the above application.

Whitehall Cottage lies to the immediate south-west of Cherry Tree Cottage, and the ownership includes horse paddocks which lie to the immediate west of the application site. The site is also visible from within the private garden area of Whitehall Cottage

The concerns set out below relate to various matters, including areas where the application does not contain sufficient detail in respect of technical matters. [REDACTED] does not however wish to comment on the principle of development, since it is acknowledged that the consideration of this matter will depend on the interpretation of national and local planning policy in the context of the current shortfall in housing supply within the District.

The areas of concern with respect of this application are therefore as follows:

## **Design and heritage**

Policy 25 of the Horsham District Planning Framework (HDPF) requires proposals to (at 25.1) protect conserve and enhance landscape character, and (at 25.4) conserve and where possible enhance the setting of the South Downs National Park. Policy 30 specifically requires development proposals '*in or close*

*to protected landscapes’ to demonstrate ‘that there will be no adverse impacts on the natural beauty and public enjoyment of these landscapes.’*

This establishes a high bar in respect of the control of development near to protected landscapes, including in terms of design outcomes. Development in other parts of the rural area is governed by Policy 26, which states that development in the countryside will only be considered acceptable where it protects, conserves and/or enhances the key features of the landscape character area in which it is located. Policies 32 and 33 also seek to promote good design that responds to locally distinctive character, and set out a range of detailed development principles that seek to achieve that aim.

Specifically in relation to the historic environment, Policy 34 requires applications for development that affect heritage assets to reinforce the special character of the District through appropriate siting, scale, form and design. The policy also requires proposals to make reference to the significance of relevant heritage assets, in accordance with current best practice.

For the reasons set out below, it is not considered that the proposal meets these policy tests.

The application seeks approval for a Scandia-hus kit design dwelling, to a standard design – referred to within the products listed on the Scandia-hus website as ‘Honeysuckle Barn’. Whilst it is accepted that this type of standard design might be generally acceptable within certain parts of the District, it is considered that the particular constraints of this site dictate a more bespoke, site-specific design solution.

The application includes a ‘Heritage Report’ (Chilcroft, July 2026) which notes that both Cherrytree Cottage and Whitehall Cottage are listed buildings, of 17<sup>th</sup> century origin. Although a detailed description of Cherrytree Cottage -including in relation to setting - is provided at paragraphs 3.4 – 3.10 of that Report, no such assessment has been carried out in relation to the closely neighbouring Whitehall Cottage.

Indeed, the Heritage Report states (at 3.11) that: *‘Where once the building would have been seen as one of the only dwellings here, it is now joined by a wider ribbon of development clustered around the edge of the highways.’* This appears to misunderstand the fact that Cherrytree and Whitehall Cottages will have been adjacent to one another for well in excess of three centuries, with the nearby Blackgate Cottage (formerly Blackgate Farm) appearing on all historic OS mapping of the area. This latter property is not listed, but it nonetheless considered to be important in establishing local character, and may be considered to be a non-designated heritage asset.

The Heritage Report does appear to conclude that the application site lies within the setting of Cherrytree Cottage, but no attempt has been made to understand

much less assess both the significance of Whitehall Cottage, and the impact that the proposal might have upon the setting of this designated heritage asset. This being the case, it is not considered that the submitted Heritage Report is sufficiently robust to enable the Council to reach an informed decision on this application.

In addition, the Heritage Report notes (at 4.12) that the consultants have *'have lead in the design of the proposed new dwelling from the outset, right through from its sighting (sic) to its architecture and use of materials. The proposed dwelling is of a style that reflects the historic former smallholding and responds to it architecturally.'*

As noted above, the design is of a standard 'off the shelf' kit house type. This being the case, it is not clear how the Heritage Report can claim to have influenced the proposals in any meaningful way – over and above seeking to provide a justification for the principle of further development on the plot.

The application site is also near to the South Downs National Park, the nearest part of which lies at Toat Plantation, some 400m to the west of the application site. Although the proximity of the National Park is mentioned within the Planning Statement (at 2.4), and the same document states (at 6.8) that it seeks to demonstrate *'that no harm will be caused to the setting of the South Downs National Park'*, no detailed assessment of landscape impact, or how local landscape character has informed the design proposed, is included within the application.

The proposal is therefore considered to be contrary to the provisions of Policies 25, 26, 32, 33 and 34 of the HDPF.

### **Trees**

The above mentioned HDPF Policy 33 also includes a presumption in favour of retaining important landscape features, including trees and hedges.

The impact of the proposal on the trees on the site is of particular concern to Mrs Houston, on the basis that many of these trees straddle the ownership boundaries between her property and that belonging to the applicant. As well as being important to overall rural character, these trees serve to enhance privacy and reduce interlooking between the two properties.

The application includes an Arboricultural Report (Barry Holdsworth, June 2026), which includes a tree protection plan showing all significant trees on the site to be retained. This includes trees T13 – T18, which lie close to the boundary of Mrs Houston's land to the west of the site.

Tree T13, in particular, is a large (22m tall) Oak tree, as illustrated in the image on p.12 of the Report. T14 is also an Oak, and both trees overhang the ownership boundary.

Both of these trees are shown as being retained. However, given their size and proximity to the proposed dwelling, it is considered that the proposed dwelling will create undue pressure for their removal, since retaining them will result in severe shading to the proposed dwelling, including the private amenity area to the immediate rear of the dwelling. Any future proposals to fell these trees by the occupants of the proposed dwelling may be hard to resist, for the reasons stated. Such removal would however result in the proposed dwelling being highly visible from Mrs Houston's property, and significantly impact on her privacy.

It is also noted that the Arboricultural Report states (at 4.8.1) that no details of underground services have been produced, and so the impact of such services has not been included within the assessment. Given the comments below in relation to drainage, this is considered to be a significant oversight.

Taking the above into account, it is not considered that the proposed layout of development is sufficiently sensitive to the long term retention of these important trees, and that a more fine grained approach to layout and siting should be adopted. Any alternative layout should also seek to ensure that any service runs (e.g. for drainage) be located so as not to result in harm to important retained trees.

### **Neighbouring amenity**

HDPF Policy 33 also requires (at criterion 2) development to be designed to avoid unacceptable harm to the amenity of occupiers / users of nearby property and land, for example through overlooking or noise.

The application site directly bounds paddocks which form part of the land associated with Whitehall Cottage, and which are used for the grazing and exercising of horses. Neither these paddocks, or the private garden of Whitehall Cottage are overlooked by adjoining properties, largely owing to the siting of Cherrytree Cottage, and the intervening mature trees as described above.

However, the proposed dwelling is sited so as to have ground and first floor windows facing due west, towards the neighbouring land and gardens. Whilst the large trees mentioned above would help to reduce any overlooking, as noted above it is not considered that the siting of the dwelling as proposed is conducive to their long term retention.

It is therefore suggested that further more detailed assessment of the site be undertaken so as to propose a siting which does not result in a harmful degree of overlooking as at present.

## **Drainage**

As noted above in respect of trees, the proposals do not currently include any details of foul or surface water drainage. Except for in passing, the submitted Planning Statement includes no details or discussion of flooding or drainage.

Given that (as noted in the above mentioned Arboricultural Report) the underlying geology of the site is Weald Clay Formation Mudstone, and which is known to have poor drainage qualities, this is a significant oversight.

Indeed, it is noted that the Parish Council have requested further details be submitted on waste and surface water drainage matters (amongst others) before they are able to give due consideration to this application. Southern Water have also requested further detail be submitted.

Although the site is shown as being within Flood Zone 1, the site is shown within the Flood Map for Planning as being subject of localised surface water (pluvial) risk and so further detailed assessment is required to demonstrate that any additional development on this site would not serve to increase surface water flooding risk elsewhere, including on adjoining properties. Given the known geological issues in this part of the District, any drainage strategy should be supported by robust ground testing data.

Similarly, the area is understood to be not on mains drainage, and that a bespoke package treatment plant solution may be required. Given that such treatment plants will routinely outflow to a soakaway type feature, it is not clear whether the ground conditions of this site would support such a solution.

## **Conclusion**

It is clear that this application has been prepared in short order, so as to seek to benefit from the current shortfall in housing supply within the District.

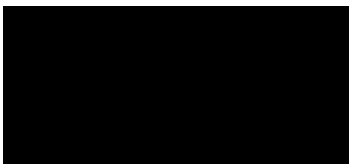
This is evidenced by the use of a standardised housing design and lack of detailed attention to matters of heritage, siting and layout in relation to trees and overlooking; and the lack of technical details relating to surface and foul drainage – as also pointed out by the Parish Council.

As it stands, the proposal is likely to create significant harm to the particular character of the area, both in respect of landscape character and the historic environment. The proposal will also lead to an unacceptable level of overlooking to adjoining property, which would be worsened by the likely removal of the mature oak trees that loom over the proposed dwelling. It is also considered that in the absence of a detailed and bespoke solution which takes account of local ground conditions, the proposal will serve to increase the likelihood of local

flooding from pluvial sources, and potentially impacting on the ability to deal with foul sewage generated by the proposed dwelling.

The Council is therefore encouraged to refuse planning permission for the scheme as presented, so as to encourage the applicant to resubmit with a more appropriate scheme which is informed by detailed technical advice in respect of heritage, landscape impact and drainage. It is hoped that this would lead to a scheme which does not create harm to adjoining properties in terms of overlooking, flooding, or in terms of the overall character and appearance of the local area.

Yours sincerely



**Lee Scott**  
MRTPI

