


Weald Chase
The Street
Bolney
West Sussex
RH17 5PF

3 July 2026

The Planning Officer
Mid Sussex District Council
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

PLANNING APPLICATION PP-15033963
Mid Sussex District Council Reference: DM/26/1560
Erection of 5 detached dwellinghouses and outbuildings, including new garage to serve
The Byre
The Byre, The Street, Bolney, West Sussex, RH17 5PG

Dear Planning Officer,

I write to object formally to the above planning application. I have reviewed the application documents and the adopted development plan policies, and I consider that the proposals are contrary to material planning policies in a number of significant respects. The objections set out below should, individually and cumulatively, weigh against the grant of planning permission.

1. Housing Mix – Conflict with Policy BOLH1 of the Bolney Neighbourhood Plan and Policy DP30 of the Mid Sussex District Plan

Policy BOLH1 of the adopted Bolney Neighbourhood Plan (2016) sets out the expected mix of dwelling sizes for housing developments in Bolney, as follows:

- 1- and 2-bed dwellings: a minimum of 40% of all dwellings
- 3-bed dwellings: 20–40% of all dwellings
- 4+-bed dwellings: a maximum of 15% of all dwellings

The application proposes five dwellings: one four-bedroom property and four five-bedroom properties. All five dwellings fall within the 4+ bedroom category. This represents 100% of the proposed units as 4+ bedrooms, against a policy maximum of 15%. Even on the most generous interpretation, Policy BOLH1 permits at most one dwelling in the 4+-bed category within a five-unit development (15% of 5 = 0.75 dwellings). The proposal provides five.

Policy BOLH1 does permit an alternative mix “if a robust justification is provided to the satisfaction of the local planning authority that the scheme as a whole would reflect the most

up to date housing needs evidence available, taking into account viability considerations.” The Planning Statement invokes this exception, but offers no such robust justification. It states only that the mix “reflects provision” in Policy BOLH1 for an alternative where there is justification, without actually providing one. The Council’s Housing and Economic Development Needs Assessment (HEDNA, March 2015) demonstrates that 44.2% of newly-forming households are unable to purchase or rent housing on the open market without financial assistance (Figure 17, page 46). The delivery of five large luxury homes — priced far beyond the reach of ordinary local families — makes no contribution to meeting identified local need. Far from constituting a justification, the proposal actively worsens the gap between the housing delivered and the housing required.

Policy DP30 of the Mid Sussex District Plan (adopted March 2018) likewise requires housing development to provide a mix of dwelling types and sizes from new development that reflects current and future local housing needs. This is not met.

This conflict with Policy BOLH1 (and DP30) should weigh significantly against the application. The Policy exists precisely to prevent the village’s limited development capacity being monopolised by large executive homes that serve neither local affordability nor local need.

2. Impact on Heritage Assets – Conflict with Policy DP34 and DP35 of the Mid Sussex District Plan, Policy BOLD1 of the Bolney Neighbourhood Plan, and NPPF Paragraphs 213–215

The application site lies in close proximity to Daltons Farm (List Entry 1354847), a Grade II listed building to the north of the site. The Heritage Statement acknowledges the historical relationship between the application site and Daltons Farm: The Byre was originally a barn within the Daltons Farm estate, and the application site historically formed part of the farmland worked from Daltons Farm.

The Heritage Statement concludes that the application makes “little contribution to the setting” of Daltons Farm and the Conservation Area. I submit that this conclusion is not adequately supported. The site’s historical character as agricultural land associated with Daltons Farm is directly relevant to the significance of that listed building as a farmstead. The setting of a farmhouse derives in part from its relationship to the land it worked. Developing that land with five large modern dwellings would irreversibly erode what remains of that legible relationship.

Policy DP34 (Listed Buildings and Other Heritage Assets) of the District Plan requires development to protect listed buildings and their settings, including demonstrating a thorough understanding of significance proportionate to the importance of the building. Policy DP35 (Conservation Areas) requires development to conserve or enhance the special character and appearance of the Conservation Area. Both policies reflect the duty in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have regard to the desirability of preserving listed buildings and their settings, and the character and appearance of conservation areas.

Policy BOLD1 of the Bolney Neighbourhood Plan requires that development “does not have an unacceptable impact on the setting of any heritage asset.”

Under paragraph 213 of the NPPF (December 2024), any harm to the significance of a designated heritage asset “should require clear and convincing justification.” Paragraph 215 provides that where there is less than substantial harm, that harm “should be weighed against the public benefits of the proposal.” In this case, the public benefits are limited: five market-rate luxury dwellings with no affordable component and a housing mix that conflicts with local policy. Those benefits are not sufficient to outweigh even less than substantial harm to the setting of a Grade II listed building and a Conservation Area.

The weight of the heritage objection is further reinforced by the Council’s own site selection review. Examination document SSP7 (Appendix 2: Site Selection Conclusions), prepared as part of the emerging Mid Sussex District Plan review, assessed this site under SHELAA reference 1040, described as “Land rear of Daltons Farm and The Byre, The Street, Bolney.” The Council’s conclusion was that the site is “Not suitable for further testing.” The assessment states, in relevant part:

“The site is adjacent to the Bolney (North) Conservation Area and in close proximity to a number of Grade II listed buildings. The proposed access is south of Dalton’s Farm, a Grade II listed building. Currently, the access is a residential driveway onto The Street. Improvements are likely necessary to provide an acceptable access for the development. The site is therefore considered sensitive in heritage terms.”

That assessment was made in the context of a proposed yield of 20 dwellings (reduced during the process from an initial 50). Even at that reduced scale, the Council found the site unsuitable for allocation on heritage grounds, specifically identifying the access arrangements as a source of heritage sensitivity. The current application relies on the same access: the existing residential driveway onto The Street, south of the Grade II listed Daltons Farm. The scale has been reduced further to five dwellings, but the heritage constraint that led the Council’s own officers to reject the site does not diminish with a smaller scheme. It would be inconsistent to refuse to allocate the site for these reasons while simultaneously granting planning permission over the same access and the same heritage setting. The Planning Statement and Heritage Statement do not engage with the SSP7 findings at all.

I note also that the access road to the proposed development passes through the Bolney Conservation Area via The Street. The introduction of a new residential access road serving five dwellings in this location will have a material and harmful effect on the character and appearance of the Conservation Area, which the Heritage Statement does not adequately address.

The Council has already assessed this site as heritage-sensitive and unsuitable for allocation. The applicant provides no evidence that the heritage constraints identified in SSP7 have been overcome. The Heritage Statement does not even acknowledge SSP7.

A further and specific heritage objection arises from the proposed materials. Every submitted elevation drawing (Plots 1–5 and the garage to serve The Byre) specifies uPVC windows and doors. Policy DP34 of the Mid Sussex District Plan states in terms that “the installation of uPVC windows and doors will not be acceptable.” The application site lies within the Bolney (North) Conservation Area, where the use of uPVC fenestration would fail to preserve or enhance the character and appearance of the area, contrary to Policies DP34 and DP35 of the District Plan and Policy BOLD1 of the Neighbourhood Plan. This is a direct and unambiguous conflict, evident on the face of the applicant’s own drawings.

In assessing the heritage harm, the Council is bound by the statutory duties in sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving the listed building and its setting, and to pay special attention to the desirability of preserving or enhancing the character and appearance of the Conservation Area. As the Court of Appeal held in *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council* [2014] EWCA Civ 137, these duties require the decision-maker to give considerable importance and weight to any such harm; a finding of “less than substantial” harm does not reduce the statutory weight to be attached to it.

3. Backland Development – Conflict with Policy BOLH2 of the Bolney Neighbourhood Plan

Policy BOLH2 of the Bolney Neighbourhood Plan governs infill and backland development within the built-up area of Bolney (and by implication, development of this character more generally). It requires that such development:

- reflects the character of the surrounding area and protects the amenity of neighbours
- does not lead to over-development of a site or give the appearance of cramming
- demonstrates that it is of a similar density to properties in the immediate surrounding area, particularly for applications for two or more dwellings on a site currently or previously occupied by a single property

The application involves five new dwellings, each of four or five bedrooms, on land behind an existing dwelling. The Street frontage retains The Byre, but the entire rear paddock and stable land is to be developed as a new residential cul-de-sac. The Street frontage is characterised by a mix of modestly-scaled detached, semi-detached and terraced dwellings – a pattern of development very different from five large detached houses laid out in a linear cul-de-sac formation behind it.

The density and scale of the proposed development do not reflect the character of the surrounding area. The introduction of five executive homes of 249–319 m² floor area into an area of predominantly smaller mixed housing is not consistent with Policy BOLH2’s requirement for development that reflects and reinforces the character of its surroundings. The proposal constitutes classic backland development: a new cul-de-sac of large detached houses behind an existing frontage property. This is precisely the form of development BOLH2 seeks to prevent.

4. Highway Safety (RSA omission / pedestrian conflict)

No Road Safety Audit Submitted (Section 7.1)

The Local Design Guide (para 7.1) requires a Road Safety Audit (RSA) for all major planning applications where proposals would “alter existing highway, intensify the use of an existing access, or provide a new access onto the highway.” The application proposes to intensify the use of an existing shared residential access from The Street — currently serving The Byre — for five additional dwellings. The access passes through pinch points between

existing buildings before opening into the development. The planning statement (para 6.79) acknowledges these pinch points but does not provide a RSA.

This omission is particularly significant given that The Street is a narrow village road with existing pedestrian movement, the 20mph speed limit requires vehicles and pedestrians to share the road, and the access is used by multiple existing properties. A RSA would normally be required to demonstrate that the intensified use of the access can be accommodated safely. Its absence means the highway safety implications of the proposal have not been independently verified in accordance with WSCC requirements.

Pedestrian Safety — Children's Playground, Playing Field and Village Hall Opposite Access

A further and specific road safety concern arises from the immediate context of the access point onto The Street. The proposed access is situated directly opposite the village children's playground and playing field. The access to Rawson Village Hall and its associated car park — a facility that generates its own pedestrian movement across The Street, including by families with young children — lies only a few yards to the south on the opposite side of The Street. The increased vehicular movements generated by five additional dwellings using a busier access at this location will materially increase the risk of conflict between vehicles turning into and out of the site and both pedestrians and vehicles accessing the facilities opposite.

Paragraph 115(b) of the NPPF (December 2024) requires that “safe and suitable access to the site can be achieved for all users.” Paragraph 117 requires development to “give priority first to pedestrian and cycle movements” and to “create places that are safe, secure and attractive — which minimise the scope for conflicts between pedestrians, cyclists and vehicles,” and, at 117(b), to “address the needs of people with disabilities and reduced mobility in relation to all modes of transport.” Policy DP21 of the Mid Sussex District Plan likewise requires development to demonstrate acceptable transport impacts, including on pedestrian safety. The user hierarchy in Manual for Streets (Table 3.2) places the needs of pedestrians at the top, ahead of general motor traffic. Children crossing to a playground are among the most vulnerable category of road user.

The existing 20mph speed limit on The Street is itself recognition by the local highway authority that this stretch of road is a sensitive pedestrian environment requiring traffic calming. It makes the absence of a Road Safety Audit — the formal mechanism for assessing precisely this type of pedestrian conflict at an intensified access — particularly difficult to justify. No RSA has been submitted and this specific hazard has therefore received no formal safety assessment in support of the application.

5. Sustainability and Infrastructure

Bolney is categorised as a Category 3 settlement in the settlement hierarchy of the Mid Sussex District Plan: a medium-sized village with some essential services but limited public transport. The nearest railway station is five miles away at Haywards Heath. This is acknowledged in the Bolney Neighbourhood Plan itself. The application's Transport Statement necessarily identifies a high degree of car dependency for future residents. The proposal to deliver five large family homes with four car parking spaces each will generate significant additional vehicular movements on The Street, which already serves as the main road through the village and is subject to a 20 mph speed limit precisely because of its constrained character.

The Planning Statement relies heavily on the future facilities to be delivered by the Foxhole Farm development as evidence of the site's sustainability. However, as noted above, that

development has not yet been built. Under the NPPF's sustainable-transport policies (paragraphs 108–117), the current sustainability of this location must be assessed against services and facilities as they exist today, not as they might exist if an adjacent development is completed.

6. Principle of Development – Conflict with Policy BOLBB1 of the Bolney Neighbourhood Plan, Policy DP6 and Policy DP12 of the Mid Sussex District Plan

Policy BOLBB1 of the Bolney Neighbourhood Plan states that “the development of Bolney shall be focused within the Built-up Area Boundary” and that outside that boundary, “development will not be permitted unless it is supported by a specific policy elsewhere in the Neighbourhood Plan or the proposal is in accordance with other planning policies applying to the Parish.”

The Planning Statement acknowledges that the majority of the application site lies outside the existing built-up area boundary, in what is, in policy terms, open countryside. The applicant relies upon Policy DP6 of the Mid Sussex District Plan (Settlement Hierarchy) to justify development in this location. Policy DP6 permits the expansion of settlements outside the built-up area boundary only where three cumulative criteria are met: the site is allocated (or, as here, the proposal is for fewer than ten dwellings); the site is contiguous with an existing built-up area; and the development is demonstrated to be sustainable. All three limbs must be satisfied, and it is on the second and third that this proposal fails.

This objection does not dispute that the site can be regarded as contiguous with the built-up area. The Council's own site assessment SSP7 records that the site is “contiguous to the defined built-up area boundary of Bolney to the east” and “adjacent to” the Foxhole Farm allocation to the south. Contiguity is, however, not the decisive question. What is telling is that, having accepted contiguity, the Council nonetheless concluded that the site is “not suitable for further testing.” It reached that conclusion because the site is “sensitive in heritage terms” and because the proposed access – a residential driveway onto The Street immediately south of the Grade II listed Daltons Farm – is problematic. The very features that led the Council to reject the site for allocation are present, unchanged, in this application; reducing the scheme from the 20 dwellings then assessed to five does not remove them.

Nor is the third limb of Policy DP6 – that the development be demonstrated to be sustainable – satisfied. For the reasons set out in Section 5 above, Bolney is a Category 3 settlement with limited services and poor public transport, and the application's claimed sustainability rests substantially on the facilities of the as-yet-unbuilt Foxhole Farm development, which has not been commenced. Current sustainability must be assessed against the services and facilities that exist today. A proposal that fails both the heritage and the sustainability limbs of the framework cannot be justified under Policy DP6, however the contiguity criterion is characterised.

The starting point in Policy BOLBB1 is therefore not displaced. That policy provides that, outside the Built-up Area Boundary, development will not be permitted unless it is supported by a specific policy of the Neighbourhood Plan or is in accordance with other planning policies applying to the Parish. The majority of the application site lies in open countryside outside the boundary; no such policy supports its development; and, as shown above, the site fails the sustainability limb of Policy DP6 and has been found by the Council itself to be unsuitable on heritage grounds.

Further, the application site is not allocated in either the adopted District Plan, the Bolney Neighbourhood Plan, or the Site Allocations DPD. The applicant treats the site as a windfall, acknowledging that it is not identified for development. Windfall development may be appropriate in some circumstances, but the weight that can be given to windfall sites does not override the clear policy presumption against development outside the built-up area in a location that was formerly pasture and stable land.

The primary purpose of Policy DP12 (Protection and Enhancement of Countryside) is, in its own words, “to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there.” The development of a new residential cul-de-sac of five large houses on paddock land is precisely what Policy DP12 seeks to prevent.

7. Transport and Parking — Non-Compliance with WSCC Parking Guidance

The application site falls within Parking Behaviour Zone 1 (PBZ1) under the West Sussex County Council Guidance on Parking at New Developments (September 2020) (hereafter "WSCC Parking Guidance"). The planning statement acknowledges this. However, the application fails to comply with several material requirements of that guidance, as well as with Policy BOLT3 of the Bolney Neighbourhood Plan.

Visitor Parking — Contrary to Policy BOLT3 and WSCC Guidance

Policy BOLT3 of the Bolney Neighbourhood Plan (Off-street Parking Provision for New Residential Developments) explicitly requires that "visitor parking must be accommodated within the development." The policy background to BOLT3 (para 4.119) explains this requirement in terms particular to Bolney: "provision should be made to provide visitor parking within the development to avoid obstructing the road or footpaths." The Street is a narrow road with existing parking pressure, and this is precisely why the Neighbourhood Plan community adopted this requirement.

The WSCC Parking Guidance (para 5.8) supports this: where the majority of spaces are allocated (as is the case here — all parking is per-dwelling allocated provision), additional visitor parking of 0.2 spaces per dwelling is appropriate. For five dwellings this equates to one dedicated visitor parking space. Neither the planning statement nor the application form identifies any designated visitor spaces beyond each dwelling's allocated provision. This is a direct conflict with an explicit policy requirement of the made Neighbourhood Plan.

Electric Vehicle Charging — Shortfall against WSCC Appendix B

WSCC Parking Guidance Principle B requires a minimum of 20% of all parking spaces to have active EV charging points, with ducting (passive provision) at all remaining spaces. Appendix B of the guidance sets out a year-by-year index for active EV provision: for 2026, the required percentage is 53% of all spaces. Applied to the 24 car spaces proposed, this equates to approximately 13 active EV charging points, with passive ducting at the remaining spaces.

The planning statement (para 6.76) states only that EV charging points will be provided "in accordance with building regulation requirements." Building Regulations Part S requires one active charger per new dwelling with associated parking — amounting to five active chargers, or approximately 21% of total spaces. This is substantially below the 53% active provision required by WSCC Appendix B for a 2026 development. No reference is made to ducting at remaining spaces. The transport justification does not address this shortfall.

Disabled Persons Parking — Omitted

WSSC Parking Guidance para 4.16 requires disabled persons parking spaces at a minimum of 5% of total spaces, with a minimum of one space. For 24 total parking spaces this requires at least two designated disabled spaces. Neither the planning statement nor the application form makes any mention of disabled parking provision. The statement notes that all dwellings will meet accessibility standard M4(2), but this addresses internal dwelling design only and does not discharge the separate requirement for designated disabled parking spaces.

Garage Dimensions — Unverified and Material to Compliance

The entire parking compliance case rests on the double garage at each dwelling counting as one allocated space under WSSC methodology (two garage bays at 0.5 spaces each). Under WSSC Parking Guidance para 4.14(a), a garage bay only counts as 0.5 of an allocated space if it is at least 6 metres by 3 metres internally. If the proposed garages fall below this internal dimension, the effective parking provision per dwelling falls to 2.0 driveway spaces under WSSC counting — below the PBZ1 demand of 2.7 spaces per dwelling. The submitted floor plans do not provide legible internal dimensions for the garages. The Transport Statement (paras 4.11–4.12) records only that Plots 1 and 5 will each have a detached garage, without stating internal dimensions.

No Formal Parking Schedule Submitted (WSSC para 5.5)

WSSC Parking Guidance para 5.5 requires applicants to provide "a schedule of parking provision, detailing the number of allocated and unallocated spaces, including garages and EV charging facilities (active and passive)." The application form records 24 car spaces and 10 cycle spaces in aggregate but provides no breakdown between allocated and unallocated spaces, no identification of garage provision by plot, and no details of EV provision. No formal parking schedule has been submitted as a supporting document.

Sustainable Drainage for Parking Areas (WSSC Principle F)

WSSC Principle F requires parking areas to adopt sustainable drainage systems (SuDS) to minimise flood risk. The planning statement addresses surface water drainage generally but does not specifically demonstrate that the new hardstanding areas — comprising the internal access road, five sets of driveway parking, and associated turning area — will be constructed with SuDS-compliant drainage. This should be addressed as a condition or by further information.

Taken together, these failures represent a material non-compliance with the WSSC Parking Guidance to which West Sussex County Council as highway authority will have regard, and a direct conflict with Policy BOLT3 of the made Bolney Neighbourhood Plan. The application should not be approved unless and until full parking compliance — including designated visitor spaces, compliant EV provision, disabled spaces, verified garage dimensions, and a formal parking schedule — has been demonstrated.

8. Fire Safety – Approved Document B, Requirement B5: Access and Facilities for the Fire Service

Requirement B5 of the Building Regulations 2010 (as given effect by Approved Document B Volume 1: Dwellings, 2019 edition incorporating 2020 and 2022 amendments) requires that reasonable provision is made within the site to enable fire appliances to gain access to the building. The application raises significant concerns in this regard.

Access Road Width

Table 13.1 of Approved Document B specifies that vehicle access routes for a pumping appliance must have a minimum road width of 3.7m between kerbs, with a lesser standard of 3.1m permitted only at specific restricted gateway points (i.e. pinch points at gates or gateposts). The applicant's own Transport Statement (para 4.7) acknowledges that the access track "narrows to an absolute minimum of 3.1 metres for approximately 50 metres." The

Transport Statement itself concedes this is "not sufficient width to facilitate two-way vehicle movement."

A continuous 50-metre sub-standard section of 3.1m cannot be equated with a gateway restriction. This fails the 3.7m standard for road width in Table 13.1. Should a fire appliance be attending a dwelling within the site, any vehicle approaching on this section from The Street would create an irresolvable conflict — with no means of passing. This represents a direct threat to life safety and is incompatible with Requirement B5.

The sole qualification in Table 13.1 Note 1 — that "the building control body may, in consultation with the local fire and rescue service, use other dimensions" — does not extinguish the concern. No evidence has been presented that West Sussex Fire & Rescue Service has been consulted on or has accepted the 3.1m sub-standard section. The WSCC Highways pre-application response (Appendix A of the Transport Statement) referred to an access width of 4.8m narrowing to 4.1m for the then-proposed 18-dwelling scheme; the current scheme delivers a materially narrower track.

Dead-End Access Route and Turning Provision

Paragraph 13.4 of Approved Document B requires that dead-end access routes longer than 20m include turning facilities for fire and rescue service vehicles, and that vehicles should not have to reverse more than 20m from the end of an access road. The access track to this backland site is plainly a dead-end road considerably longer than 20m. The applicant claims (para 4.13 of the Transport Statement) that a turning area is provided to the east of Plot 5, tested by swept path analysis. However, Table 13.1 requires a minimum turning circle of 16.8m between kerbs (19.2m between walls). The application documents do not state the dimensions of the proposed turning area, and the swept path drawings are not supported by annotated dimensions that would allow independent verification of compliance with Table 13.1.

Hydrant Provision

Paragraph 14.8 of Approved Document B requires provision of additional fire hydrants where a building has a compartment exceeding 280m² and is being erected more than 100m from an existing fire hydrant. These are large 4 and 5-bedroom detached dwellinghouses. The application makes no reference to hydrant provision or to the proximity of existing hydrants, and no hydrant survey or assessment has been submitted. This omission is a material gap in the fire safety case for the development.

Conclusion on Requirement B5

The development fails to demonstrate compliance with Requirement B5 of the Building Regulations 2010 as implemented through Approved Document B Volume 1. The 50-metre sub-standard access width of 3.1m fails Table 13.1, the turning area dimensions have not been verified against Table 13.1 standards, and no hydrant assessment has been provided. Planning permission should not be granted unless and until these matters are satisfactorily resolved with input from West Sussex Fire & Rescue Service.

9. Highway Design — Non-Compliance with WSCC Local Design Guide

The West Sussex County Council Local Design Guide (Supplementary Guidance for Residential Development Proposals, v1.1, 2010) sets out the highway authority's requirements for new residential developments. The application does not comply with several provisions of that guide.

Garage Dimensions: Internal Contradiction in the Application (Section 6.2)

The Local Design Guide (para 6.2) states: "Where garages are provided, they shall be designed to a dimension of 6m x 3m in order to accommodate both a motor vehicle and cycles. Where garages of a smaller size are proposed it must be demonstrated that alternative provision has been made for cycle storage."

The application proposes a double garage at each dwelling and also 10 separate dedicated cycle parking spaces. This creates an unresolved contradiction. If the garages meet the required 6m x 3m internal dimension they are, by definition, designed to accommodate both a car and cycles — making the 10 separate cycle spaces redundant. If the garages are smaller than 6m x 3m, then the Local Design Guide requires alternative cycle storage to be provided (which the 10 spaces would fulfil) — but in that case the garages cannot count as 0.5 parking spaces each under the WSCC Parking Guidance (September 2020, para 4.14(a)), which applies the same 6m x 3m internal minimum as a condition of counting garage bays toward parking demand.

In either scenario, the application is internally inconsistent. The garage internal dimensions are not stated on the submitted plans or in the planning statement, and the Transport Statement (paras 4.11–4.12) does not state the garage internal dimensions. The application cannot be assessed as compliant with either document until garage dimensions are confirmed by way of dimensioned plans.

Carriageway Widths at Pinch Points Not Quantified (Section 5.3)

Where carriageway width falls below 3.7m, the Local Design Guide (para 5.3) requires a minimum clear width of 3.1m past any permanent vertical obstruction to allow fire appliances to manoeuvre. The planning statement acknowledges that the internal access road narrows at "pinch points between existing buildings" (para 6.79) but states only that there is "sufficient space for vehicles to pass pedestrians" — it does not quantify the widths at these pinch points against the 3.1m minimum. The swept path analysis in Appendix E of the Transport Statement addresses only the turning area at the end of the access track and does not quantify clearance widths at the pinch points against the 3.1m minimum.

Highway Materials and Adoption Status Not Addressed (Section 8)

The Local Design Guide (para 8.5) requires proposed highway materials to be easily maintained, locally sourced where possible, natural where possible, and to incorporate sustainable drainage. If the internal access road is to be offered for adoption as public highway, a Section 38 agreement with the County Council is required (para 8.2); if works affect the existing highway, a Section 278 agreement is required (para 8.3). The planning statement does not address the proposed surfacing materials for the new internal road, driveways, or parking areas, and does not state whether the road is intended for adoption or will remain private. Neither a Section 38 nor Section 278 agreement is referenced, despite the access alterations described at para 6.77 of the planning statement.

Street Lighting in a Conservation Area Setting Not Addressed (Sections 8.7–8.8)

The Local Design Guide (para 8.7) requires WSCC to be satisfied that any adopted street lighting meets WSCC standards. Paragraph 8.8 provides that where non-standard lighting is proposed, commuted sums are required for maintenance — but that commuted sums do not apply in conservation areas. The application site lies adjacent to the Bolney Conservation Area. The planning statement makes no reference to street lighting on the proposed internal access road. It is unclear whether lighting is proposed, what standard is intended, how it would interact with the conservation area setting, and whether any Section 38 adoption of street lighting is envisaged. This is a gap that the highway authority will need to address. These failures under the Local Design Guide compound the parking compliance failures identified in Section 9 above. The Road Safety Audit omission is particularly serious: it is a standard requirement where an existing access is being intensified, and its absence means that an independent safety assessment of the proposed access arrangements has not been carried out. Taken with the unresolved garage dimension question and the absence of a Road Safety Audit, the highway case for this application is materially incomplete.

10. Further Highway Concerns — Manual for Streets

The Manual for Streets (MfS, 2007) is the primary national technical guidance for the design of new residential streets. It is referenced throughout the WSCC Local Design Guide and is the source document for many of the standards applied by the highway authority. The following concerns arise from MfS provisions not already addressed in Section 10 above.

Cycle Parking: Not Confirmed as Covered or Lockable (MfS 8.2.13)

MfS states: "Cycles are not suited to overnight storage outdoors as they are vulnerable to theft and adverse weather. At the very least, any outdoor cycle parking needs to be covered, and preferably lockable." This is the minimum standard for residential cycle parking under national guidance. The application records 10 cycle parking spaces on the application form but no drawing or document specifies whether the cycle stores are covered, lockable, or secure. Without this confirmation the cycle parking provision does not demonstrably meet the MfS minimum standard, and the WSCC Parking Guidance requirement (Table 1) for two cycle spaces per dwelling is not properly discharged.

Waste Vehicle Routing Not Addressed (MfS 7.10.3)

MfS requires that "routing for waste vehicles should be determined at the concept masterplan or scheme design stage" and that "wherever possible, routing should be configured so that the refuse collection can be made without the vehicle having to reverse." The internal access road is a cul-de-sac serving five dwellings. A turning area is provided at its western end for fire appliances. Critically, the applicant's own Transport Statement (para 4.14) concedes that, because of the presence of a historic wall at the existing access, a local authority refuse vehicle "cannot enter and exit the site in forward gear," and that as a result "refuse collection personnel will be required to drag the refuse from the site towards the refuse vehicle" on The Street. That is an express admission that the scheme cannot accommodate council refuse collection in the manner MfS requires, and it displaces bin-dragging and refuse-vehicle waiting onto The Street – directly opposite the children's playground and the village hall. MfS (4.5.7) also cautions that cul-de-sacs "lead to additional vehicle travel and emissions, particularly by service vehicles." This has not been addressed anywhere in the application.

Shared Surface Access Road: Accessibility for Disabled Users Not Addressed (MfS 7.2.10–7.2.13 and 6.1.1)

The internal access road has no formal footway. Pedestrians and vehicles share the same surface and must negotiate priority, particularly at the acknowledged pinch points between existing buildings. MfS notes that research has "illustrated the problems that shared surfaces cause for blind or partially-sighted and other disabled people" (7.2.10–7.2.11) and that shared surfaces require careful design to avoid "vulnerable road users feeling threatened by having no space protected from vehicles" (7.2.12). MfS places a general inclusive design obligation on residential street design: "Street design should be inclusive. Inclusive design means providing for all people regardless of age or ability. There is a general duty for public authorities to promote equality under the Disability Discrimination Act 2005" (6.1.1). The planning statement does not address how disabled or visually impaired pedestrians — whether residents or visitors — will safely navigate the shared-surface access route. No inclusive design assessment has been submitted.

Crime Prevention: New Rear Access to Existing Dwellings (MfS 4.6.3)

MfS, citing the government's Safer Places guidance, states that "access to the rear of dwellings from public spaces, including alleys, should be avoided." The proposed internal access road runs along the rear boundary of existing properties on The Street. The site also has a public footpath at its rear boundary. This creates a new vehicle route and associated pedestrian movement corridor directly adjacent to the back gardens of existing dwellings — exactly the crime prevention concern that MfS identifies. The planning statement and Design and Access Statement do not address the crime prevention impact on neighbouring

properties, and no consultation with Sussex Police (Designing Out Crime) appears to have been undertaken or referenced.

Garage Use: Scheme-Specific Assessment Required by MfS (MfS 8.3.39–8.3.41)

MfS presents research demonstrating that only 36–45% of garages in new residential developments are actually used for car parking; the remainder are used for storage or converted to other uses. MfS states that "whether garages count fully will need to be decided on a scheme-by-scheme basis" having regard to the availability of alternative parking, the availability of separate cycle storage, and garage size. The planning statement makes no scheme-specific assessment of this kind. It asserts without supporting analysis that garage bays will count as 0.5 spaces each. Given the national evidence on garage use, and given that The Street has severe on-street parking constraints (as acknowledged by the Bolney Neighbourhood Plan background to Policy BOLT3), a scheme-specific assessment of likely garage use — and what the parking implications would be if garages are not used for parking — is required and has not been provided.

Road Adoption and Long-Term Maintenance Not Addressed (MfS 11.7 and 11.9)

MfS notes that five dwellings is the threshold commonly used by highway authorities when considering whether to adopt a new residential access road (11.7.15). This application is exactly at that threshold. The planning statement does not state whether the internal access road is intended for adoption as public highway (which would require a Section 38 agreement under the Highways Act 1980) or is to remain private. If it is to remain private, MfS (11.9) requires that private management arrangements be established to ensure long-term maintenance. No such arrangements are described in any application document. Failure to resolve the adoption and maintenance position leaves future residents with no certainty about how the road serving their homes will be maintained.

These failures under the Manual for Streets compound the concerns raised in Sections 9 and 10 above. The absence of covered cycle storage, unresolved waste vehicle routing, failure to address shared surface accessibility, lack of crime prevention assessment, unsubstantiated garage use assumptions, and unresolved road adoption arrangements together represent a highway design submission that is materially incomplete and does not meet the standards expected of a residential development of this nature.

11. Landscape Character and Proximity to the High Weald National Landscape – Conflict with Policy BOLE2 of the Bolney Neighbourhood Plan and Policy DP16 of the Mid Sussex District Plan

Policy BOLE2 of the Bolney Neighbourhood Plan states that, outside the built-up area boundary, “development must demonstrate that it does not have an unacceptable impact on the landscape.” The majority of the application site lies outside the built-up area boundary. The development of open paddock and stable land with five large detached dwellings, access road, driveways, garages, and domestic curtilages will have a significant and lasting impact on the rural character of this edge-of-settlement location.

The Bolney Neighbourhood Plan records that the High Weald Area of Outstanding Natural Beauty (now National Landscape) “takes in the north and north eastern parts of the Parish, totalling 2/5ths of the Parish.” The Planning Statement places the site approximately 500 metres from the National Landscape boundary. At this separation, the site falls within the setting of the High Weald National Landscape.

Policy DP16 of the Mid Sussex District Plan provides that “development on land that contributes to the setting of the AONB will only be permitted where it does not detract from

the visual qualities and essential characteristics of the AONB, and in particular should not adversely affect the views into and out of the AONB by virtue of its location or design.” NPPF paragraph 189 directs that great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes, which have the highest status of protection in relation to these issues. Development in the setting of a National Landscape which would harm those qualities therefore engages that great-weight protection, and Policy DP16 applies the same test to land that contributes to the setting of the designated area. Furthermore, because the application site extends to approximately 1.1 hectares, the proposal constitutes “major development” for planning purposes. Policy BOLE2 provides that “major development which has an unacceptable impact on the landscape and scenic beauty of the High Weald Area of Outstanding Natural Beauty shall be refused, unless it can be demonstrated that there are exceptional circumstances and that it is in the public interest.” No exceptional circumstances have been advanced, and the harm to this edge-of-settlement countryside within the setting of the National Landscape has not been assessed at all.

The Planning Statement dismisses any impact on the National Landscape in a single paragraph, relying on the assertion that tree cover prevents inter-visibility. No landscape assessment has been provided to substantiate this claim and to demonstrate compliance with Policy DP16. In the absence of such an assessment, the application fails to satisfy the tests in that policy.

12. Ecology and Biodiversity – Application Not in a Determinable State

The ecological information submitted with the application is incomplete on its own terms. The document submitted is expressly an “Interim Ecological Impact Assessment,” which states that a full assessment “will be submitted once the data from the third bat activity [survey] has been collected and analysed.” That third bat survey had not been completed at the date of submission. The interim survey work has, however, already recorded the presence of barbastelle – a rare bat listed on Annex II of the Habitats Directive and a European Protected Species – associated with the site.

All species of bat are European Protected Species. Under regulation 9(3) of the Conservation of Habitats and Species Regulations 2017, the Council as competent authority must have regard to the requirements of the Habitats Directive in exercising its planning functions. The courts have held that a planning authority cannot lawfully grant permission where a European Protected Species may be affected without first obtaining sufficient survey information to understand the impact of the development and the likelihood of a licence being granted (*R (Woolley) v Cheshire East Borough Council* [2009] EWHC 1227 (Admin)). To determine the application on the basis of an admittedly interim assessment, before the outstanding barbastelle survey has been completed and interpreted, would be premature.

Separately, the statutory biodiversity net gain information is deficient. Biodiversity net gain is now a mandatory requirement for planning permission, secured through the general biodiversity gain condition under the Environment Act 2021. The statutory BNG metric submitted with this application was completed with mandatory fields left blank and without the required baseline and post-intervention maps, so the claimed net-gain position cannot be verified.

The application therefore conflicts with Policy DP38 (Biodiversity) of the Mid Sussex District Plan and paragraphs 44, 180 to 182 and 193 of the NPPF, and is not in a state in which it can properly or lawfully be determined. A complete Ecological Impact Assessment, incorporating the third bat survey, and a valid statutory BNG metric should be submitted and consulted upon before any decision is taken.

13. Adequacy of Information — Application Cannot Be Properly Assessed

Paragraph 44 of the National Planning Policy Framework (December 2024) states that "the right information is crucial to good decision-making, particularly where formal assessments are required." The following information is either absent from the application or is contradicted by the applicant's own submitted documents. In each case the specific policy or guidance that required the information to be provided is identified, together with the consequence for the LPA's ability to assess the application. The Council should not determine this application until each gap has been addressed.

The reliability of the application documents themselves compounds these gaps. A cross-reference of the submitted material reveals internal errors and contradictions that bear directly on the ability to assess the proposal: highway data in the Transport Statement is attributed to Surrey County Council rather than West Sussex County Council; the planning reference for the neighbouring Foxhole Farm permission is transposed; and the width of the access track at its narrowest point is stated inconsistently between the Transport Statement body text (3.1 metres) and the West Sussex highways pre-application response (4.1 metres). Individually minor, these errors collectively indicate that the application has not been prepared with the care that Paragraph 44 of the NPPF requires, and they reinforce the need for the outstanding information to be provided and independently verified before determination.

Missing or Contradictory Information	Required by	Consequence for Assessment
Parking schedule — no schedule of allocated and unallocated spaces, garages, and EV provision submitted	WSCC Parking Guidance (September 2020) para 5.5	Without a schedule, the LPA cannot verify whether the claimed parking provision meets the PBZ1 demand standard of 2.7 spaces per dwelling or the visitor, disabled and EV charging requirements. The entire parking compliance case is unverifiable on the submitted documents.
Garage internal dimensions — not stated on any submitted plan or in any submitted document	WSCC Parking Guidance para 4.14(a) (garage bay counts as 0.5 space only if it meets the required internal dimension); WSCC Local Design Guide para 6.2 (garages must be 6m×3m to accommodate car and cycles)	The applicant's entire parking compliance case depends on each double garage counting as one allocated space (two bays at 0.5 each). That count is only valid if each bay meets the required internal dimension. Without stated dimensions, neither the LPA nor WSCC as highway authority can assess whether the garages qualify. If they do not, the development falls materially short of the PBZ1 standard and of Policy BOLT3.
Road Safety Audit — not submitted	WSCC Local Design Guide para 7.1 (RSA required for all major applications where an existing access is intensified or a new access provided)	The application proposes to intensify the use of an existing private access track on a 20mph village road with established pedestrian movement. This is precisely the scenario for which an RSA is mandatory under the Local Design Guide. Without it, highway safety cannot be properly evaluated.

Missing or Contradictory Information	Required by	Consequence for Assessment
EV charging provision — contradictory and sub-standard	WSCC Parking Guidance Principle B and Appendix B (year-by-year active EV index: 53% for 2026); Building Regulations 2010 Part S	The Planning Statement (para 6.76) states only that EV charging will be "in accordance with building regulation requirements." Part S requires one active charger per new dwelling with associated parking — equating to approximately 21% of spaces (5 of 24). WSCC Appendix B requires 53% active provision (approximately 13 of 24 spaces) for a 2026 application. The application has not addressed this shortfall and no scheme of active EV charging has been submitted.
Disabled parking — not addressed	WSCC Parking Guidance para 4.16 (minimum 5% of total spaces, minimum one space, to be designated for disabled users)	24 parking spaces are proposed. WSCC requires at least two designated disabled spaces. The application form, planning statement and transport statement are silent on disabled parking. No designated spaces are shown on any submitted plan.
Visitor parking — absent	Policy BOLT3 (Bolney Neighbourhood Plan: "visitor parking must be accommodated within the development"); WSCC Parking Guidance para 5.8 (0.2 visitor spaces per dwelling where all spaces are allocated)	All parking is allocated on a per-dwelling basis. WSCC requires a minimum of one visitor space ($0.2 \times 5 = 1.0$ space). Policy BOLT3 independently requires visitor parking on-site. No visitor spaces are identified anywhere in the application.
Fire appliance turning area dimensions — not stated	Approved Document B Volume 1 (2019 ed.) Table 13.1 (minimum turning circle 16.8m between kerbs / 19.2m between walls for pumping appliance)	The applicant claims a dedicated turning area exists to the east of Plot 5 and that swept path analysis confirms compliance. However, the swept path drawings contain no annotated dimensions for the turning area. The LPA cannot verify compliance with Table 13.1 without stated turning circle dimensions.
Hydrant proximity assessment — not submitted	Approved Document B Volume 1 (2019 ed.) para 14.8 (additional hydrants required where building erected more than 100m from an existing hydrant)	The application proposes five large dwellings on a backland site. No hydrant survey or assessment has been submitted. The LPA cannot determine whether existing hydrants are within 100m or whether additional provision is required.
Landscape and visual impact assessment — not submitted	Policy BOLE2 (Bolney NP: development outside BUAB must demonstrate it does not harm landscape character or setting of the National	The site adjoins the High Weald National Landscape. A statutory duty of great weight to conserve and enhance applies under s.85 CROW Act 2000. The Planning Statement dismisses any impact

Missing or Contradictory Information	Required by	Consequence for Assessment
	Landscape); Policy DP16 (District Plan: AONB setting); NPPF paras 189–191	in a single paragraph. No landscape and visual impact assessment has been submitted. The LPA cannot properly discharge its s.85 duty without one.

14. Summary of Policy Conflicts

The following table summarises the principal policy conflicts and the evidence sources on which this objection relies. Where the evidence source is the applicant's own document, the specific paragraph or concession is identified.

Issue	Policy / Legislation	Evidence Source
Housing mix	BOLH1 (Bolney Neighbourhood Plan, made 2016); DP30 (Mid Sussex District Plan); s.38(6) PCPA 2004	Planning Statement (no robust justification for total departure from required mix — all five dwellings 4–5 bedrooms contrary to BOLH1 requirements); Bolney Neighbourhood Plan para 4.96
Heritage harm	DP34; DP35 (Mid Sussex District Plan); BOLD1 (Bolney NP); NPPF paras 213–215 (December 2024)	Heritage Statement (fails to assess harm to setting of Daltons Farm, Grade II listed, entry 1354847, or Conservation Area); Council's own Local Plan review / SSP7 (site assessed as heritage-sensitive and unsuitable for allocation — Heritage Statement does not acknowledge SSP7); DM/22/3404 refusal (March 2023)
Backland development	BOLH2 (Bolney NP)	Planning Statement; Proposed Site Plan (327-P3c); DM/21/1593 refusal (February 2022 – rear of The Street, Bolney). Proposal is classic backland development: cul-de-sac of large detached houses behind an existing frontage property — precisely the form BOLH2 seeks to prevent.
Highway safety — RSA omission / pedestrian conflict	NPPF paras 115(b) and 117 (December 2024); Policy DP21 (Mid Sussex District Plan — Transport); WSCC Local Design Guide (v1.1, 2010) para 7.1; Manual for Streets (2007) user hierarchy (Table 3.2)	No Road Safety Audit submitted despite intensification of existing access (mandatory under WSCC LDG para 7.1). Access directly opposite the village children's playground and playing field; Rawson Village Hall car park a short distance south — increased vehicle movements create specific risk to pedestrians including small children crossing The Street. Existing 20mph limit confirms pedestrian sensitivity of location.
Sustainability / accessibility	DP6; BOLBB1 (Bolney NP); DP21; NPPF paras 108–117	Planning Statement (Category 3 settlement; relies on undelivered Foxhole Farm allocation facilities not yet commenced); Transport Statement (no safe walking or cycling route established

Issue	Policy / Legislation	Evidence Source
Principle of development / settlement boundary	BOLBB1 (Bolney NP); DP6; DP12; s.38(6) PCPA 2004	to key services). Current sustainability must be assessed against what exists today, not what may be built. Planning Statement (acknowledges site lies mostly outside BUAB). Even accepting contiguity, Policy DP6 is a cumulative test: the sustainability limb is not met (Category 3 settlement; reliance on the unbuilt Foxhole Farm facilities). SSP7 found the site “not suitable for further testing” despite accepting contiguity, on heritage/access grounds. DM/21/1593 refusal (2022); DM/26/0317 refusal (2026); DM/18/0953/4 refusal (2019).
Parking / EV charging / disabled provision	DP26; BOLT3 (Bolney NP); WSCC Guidance on Parking at New Developments (September 2020); Building Regulations 2010 Part S	Planning Statement paras 6.80–6.82 (own concessions: EV charging only "in accordance with building regulations" — ~21% of spaces against WSCC Appendix B index of 53% for 2026; no visitor parking; no disabled parking); no parking schedule submitted (WSCC para 5.5); garage dimensions unverified (WSCC para 4.14(a)).
Fire safety / emergency vehicle access	Building Regulations 2010 Schedule 1 Requirement B5; Approved Document B Volume 1: Dwellings (2019 ed.) Section 13, Table 13.1, paras 13.4, 14.8	Transport Statement para 4.7 (own concession: access narrows to 3.1m for ~50m — below 3.7m minimum in ADB Table 13.1; "not sufficient width for two-way movement"); turning area dimensions not verified against Table 13.1; no hydrant proximity assessment submitted.
Highway design	WSCC Local Design Guide (v1.1, 2010) paras 5.3, 6.2, 8.5, 8.7–8.8; DP26	Transport Statement (garage dimensions not stated; internal contradiction between double garages and separate cycle stores); carriageway pinch points not quantified against 3.1m fire appliance clearance standard; adoption/maintenance of road not addressed; Conservation Area street lighting not addressed.
Residential street design (Manual for Streets)	Manual for Streets (DfT/DCLG, 2007) paras 4.6.3, 7.2.10–7.2.13, 7.10.3, 8.2.13, 8.3.39–8.3.41, 11.7.15; DP26	Transport Statement para 4.14 (own concession: refuse vehicles cannot enter/exit in forward gear — operatives must drag refuse to The Street); cycle parking not confirmed covered and lockable; shared surface access raises accessibility concerns; rear access to existing properties raises crime prevention concerns.

Issue	Policy / Legislation	Evidence Source
Landscape character and High Weald National Landscape	DP12; BOLE2 (Bolney NP); DP16 (Mid Sussex District Plan); Countryside and Rights of Way Act 2000 s.85 (as strengthened by the Levelling-up and Regeneration Act 2023); NPPF paras 189–191	Planning Statement (no landscape and visual impact assessment submitted; National Landscape impact dismissed in a single paragraph without evidence); statutory duty of great weight to conserve and enhance under s.85 CROW Act 2000 not discharged.
Adequacy of information	NPPF para 44 (December 2024)	Multiple required documents absent or contradicted: parking schedule (WSCC para 5.5); garage dimensions (WSCC para 4.14 / LDG para 6.2); Road Safety Audit (LDG para 7.1); EV charging scheme; disabled parking provision; hydrant assessment (ADB para 14.8); turning area dimensions (ADB Table 13.1); landscape and visual impact assessment (BOLE2 / DP16). Council should not determine application until gaps addressed.
Biodiversity net gain	Environment Act 2021 s.98; NPPF paras 180–181	BNG Impact Report (applicant's own document)

15. Relevant Precedent Decisions

The Council has refused a number of comparable applications in Bolney and the immediately surrounding area. The following decisions are directly relevant to the grounds of objection set out above.

DM/21/1593 – Rear of Rosedale, The Street, Bolney (Refused February 2022)

This is the most directly comparable precedent. The application was for a single backland dwelling to the rear of a property on The Street — the same road as the application site. The Council refused the application on the grounds that the proposal was "an inappropriate overdevelopment that would fail to comply with District Plan Policy DP26 and Policy BOLH2 of the Bolney Neighbourhood Plan." The officer found that the backland site would "contrast with the form, layout and materials palette of the surrounding development, appear out of context and create an intensity of use... that would affect the privacy and amenities of the neighbours." The current proposal, which involves five large dwellings and outbuildings on a backland former paddock on the same road, is a far more significant departure from the surroundings and engages Policy BOLH2 even more acutely.

DM/18/0953 and DM/18/0954 – Land North of Bolney, London Road (Refused January 2019)

Both applications for residential development outside the Bolney built-up area were refused. The officer report applied the three-part test in Policy DP6 and concluded the proposals failed because the site was not allocated, was not contiguous with the existing built-up area, and was not sustainable. The Conservation Officer found that "the undeveloped, rural nature of the site makes a strong positive contribution to the setting of the [heritage] assets, and the manner in which their special interest is appreciated. The current proposal would fundamentally alter the character of the site, which would become suburbanised. This would be to the detriment of the setting of all of the named heritage assets." The decision also noted that Bolney is a Category 3 settlement with "a limited range of services." All of these findings apply with equal force to the current application.

DM/26/0317 – Glebelands Field, Lodge Lane, Bolney (Refused March 2026)

In this most recent housing refusal at Bolney, the officer concluded that the site was "not contiguous with the existing built-up area of Bolney nor is it allocated." Significantly, the report found that even where built development abutted three sides of a site, a gap between the site and those properties meant contiguity was not established — a principle directly applicable here, where the application site lies behind The Byre and relies on the as-yet-unbuilt Foxhole Farm development for claimed southern contiguity. The officer also found that the proposal would have "an adverse impact on the setting of the heritage assets to the north-east, i.e. the Bolney Conservation Area and The Thatched House listed building, which is appreciated by the openness of the land to the south." Policy BOLBB1 of the Bolney Neighbourhood Plan was cited as a key ground of refusal.

DM/26/0111 – Old Mill House, Cowfold Road, Bolney (Refused March 2026)

A proposal to demolish existing stable buildings and erect a self-build dwelling was refused on the grounds that the site was not within any defined settlement boundary and was approximately 1km from Bolney, a Category 3 settlement. On heritage, the officer found that the proposal "would inflict less than substantial harm towards the setting of the grade II listed building" and that "the proposal would not provide sufficient discernible benefits to outweigh the less than substantial harm inflicted towards the heritage assets." Policy DP34 and NPPF heritage provisions were applied. The current application similarly involves a Grade II listed building (Daltons Farm) and the Bolney Conservation Area.

DM/22/3404 – The Old Post Office, The Street, Bolney (Refused March 2023)

An application for relatively minor alterations to an unlisted building on The Street, Bolney — within the Conservation Area and close to the Grade I listed church — was refused because the Conservation Officer found "less than substantial harm to the character and appearance of the Conservation Area, at around the mid point of that scale." Policies DP34, DP35, DP36 and BOLD1 were cited. This establishes that the Council applies conservation area protections strictly to The Street itself. The current proposal, which would introduce five new dwellinghouses and outbuildings accessed from The Street, in an area the Council's own site selection process found to be "sensitive in heritage terms," would cause harm on a substantially greater scale.

These decisions demonstrate a consistent pattern of refusal for development that conflicts with the built-up area boundary, causes harm to heritage assets in the Bolney Conservation Area, or results in backland overdevelopment on The Street. The current application engages all three of these grounds simultaneously.

16. Housing Land Supply and the Application of the Tilted Balance (NPPF Paragraph 11)

The Planning Statement contends that the Council is currently unable to demonstrate a five-year supply of deliverable housing sites, and that this engages the "tilted balance" in paragraph 11(d) of the NPPF, under which permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. This objection does not accept that the tilted balance dictates approval, for three reasons. First, paragraph 11(d)(i) disapplies the tilted balance where the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development. The policies listed in the associated footnote include those relating to designated heritage assets and to land within a National Landscape. For the reasons set out in Sections 2 and 11 above, the proposal would harm the setting of the Grade II listed Daltons Farm and the Bolney Conservation Area, and would harm the setting of the High Weald National Landscape. Those protective policies provide a clear reason for refusal, and the tilted balance is therefore not engaged.

Secondly, and in any event, even if the tilted balance were engaged, the adverse impacts of the development would significantly and demonstrably outweigh its benefits. The benefits are limited: five large open-market dwellings, with no affordable housing and a housing mix that conflicts with Policy BOLH1, making only a negligible contribution to the district's housing requirement. Against those limited benefits fall the heritage harm, the landscape harm, the conflict with the Built-up Area Boundary, the unresolved highway-safety and fire-safety concerns, and the multiple failures of information identified above. On the evidence submitted, the balance falls clearly against the grant of permission.

Thirdly, a shortfall in housing land supply does not deprive the Bolney Neighbourhood Plan of weight. The made Neighbourhood Plan forms part of the statutory development plan, and section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the application to be determined in accordance with the development plan unless material considerations indicate otherwise. Policies BOLBB1, BOLH1 and BOLE2 are not merely policies for the supply of housing; they are locally-specific policies protecting the character, heritage and countryside setting of the village, and they continue to attract significant weight.

17. Planning Balance

The following table summarises the planning balance as assessed in this objection. The applicant's Planning Statement presents a competing balance which concludes that benefits outweigh harms; this table identifies, on each ground, why that characterisation is not soundly evidenced. On no ground is the identified harm outweighed by a material public benefit.

Issue	Assessment	Weight
Housing Mix	Policy BOLH1 requires a mix of dwelling sizes reflecting local need. All five proposed dwellings are 4- or 5-bedroom market homes; not a single dwelling falls within the smaller sizes required by BOLH1. No robust justification for departure from the required mix has been demonstrated. Policy DP30 (Mid Sussex District Plan) similarly requires an appropriate mix. The Planning Statement offers no meaningful engagement with either policy.	Significant Negative Weight
Principle of Development / Settlement Boundary	The application site lies predominantly outside the Bolney Built-Up Area Boundary (BUAB). Policy BOLBB1 (Bolney NP) requires development to be focused within the BUAB. Policy DP6 (Mid Sussex District Plan) permits development outside the BUAB only where the site is allocated or the scheme is for fewer than ten dwellings, AND is contiguous with the BUAB, AND is demonstrably sustainable – all three cumulatively. Even taking contiguity as accepted, the sustainability limb fails (Category 3 settlement; reliance on the unbuilt Foxhole Farm facilities). Policy DP12 protects the countryside. The Council's own site assessment SSP7 found the site "not suitable for further testing" on heritage and access grounds notwithstanding contiguity. Reinforced by refusals at DM/21/1593, DM/26/0317 and DM/18/0953/4.	Significant Negative Weight

Issue	Assessment	Weight
Heritage	The site lies immediately adjacent to Daltons Farm (Grade II listed, entry 1354847) and The Byre (unlisted but within the setting of the Conservation Area), and access passes through the Bolney (North) Conservation Area. The Heritage Statement fails to adequately assess harm to the setting of Daltons Farm or the Conservation Area; the Council's own Local Plan review found the site "unsuitable" partly on heritage grounds. Under NPPF para 213-215, less than substantial harm must be weighed against public benefits: none capable of outweighing the harm have been identified. Reinforced by refusal DM/22/3404 on Conservation Area harm.	Moderate to Significant Negative Weight
Landscape & High Weald National Landscape	The application site adjoins the High Weald National Landscape. Policy BOLE2 (Bolney NP) requires development outside the BUAB to demonstrate it does not harm the landscape character or setting of the National Landscape. Policy DP16 (District Plan) applies the same test to the AONB setting. A statutory duty of great weight to conserve and enhance the National Landscape exists under s.85 CROW Act 2000. The Planning Statement dismisses any impact in a single paragraph without any landscape and visual impact assessment.	Significant Negative Weight
Backland Development	Policy BOLH2 governs infill and backland development within the Bolney BUAB. Even if the site were accepted as within the BUAB (which this objection contests), the five large dwellings on a former paddock would result in overdevelopment inconsistent with the pattern, density and character of the surrounding area. The proposal replicates the type of scheme refused at DM/21/1593 (rear of The Street, Bolney).	Moderate to Significant Negative Weight
Sustainability	Bolney is a Category 3 settlement in the adopted settlement hierarchy. The Planning Statement relies on facilities from the future Foxhole Farm allocation which have not yet been delivered. The site has no safe walking route to key services for five large dwellings. The development will be entirely car-dependent. The Planning Statement does not demonstrate the site is sustainably located for a scheme of this scale.	Moderate Negative Weight
Housing Delivery	Five additional dwellings would make a negligible contribution to the district's housing land supply. All five are large market homes (4- and 5-bedroom); there is no affordable housing element and no specialist or accessible housing. The NPPF's	Limited Positive Weight

Issue	Assessment	Weight
Transport & Parking	tilted balance under para 11(d) arises only where housing land supply is demonstrably below the 5-year threshold; even if engaged, it is not a trump card over the significant policy conflicts identified. Multiple failures against WSCC Parking Guidance (Sept 2020): no visitor parking contrary to BOLT3 and WSCC para 5.8; EV charging at ~21% of spaces against 53% required by WSCC Appendix B index for 2026; no disabled parking despite WSCC para 4.16 requirement; garage dimensions unverified, putting the whole compliance calculation at risk; no parking schedule submitted (WSCC para 5.5). These are not minor technical shortcomings — the applicant's own parking compliance case depends entirely on the double garages meeting the 6m×3m standard, which has not been demonstrated.	Moderate to Significant Negative Weight
Highway Design	Non-compliance with WSCC Local Design Guide: no Road Safety Audit submitted despite intensification of an existing access (RSA required under LDG para 7.1); internal contradiction on garage dimensions versus separate cycle stores; pinch points not fully quantified against the 3.1m fire appliance clearance standard; adoption status and maintenance of access road not addressed; Conservation Area street lighting not addressed (LDG paras 8.7–8.8).	Moderate Negative Weight
Residential Street Design (Manual for Streets)	Cycle parking not confirmed as covered and lockable (MfS 8.2.13); refuse vehicle routing unresolved — Transport Statement accepts that refuse collection vehicles cannot enter and exit in forward gear, requiring operatives to drag refuse to The Street (MfS 7.10.3); shared surface access road raises accessibility concerns for disabled and visually impaired residents (MfS 7.2.10–7.2.13); new rear access to existing properties raises crime prevention concerns (MfS 4.6.3); adoption/maintenance of road unaddressed at the 5-dwelling adoption threshold (MfS 11.7.15).	Moderate Negative Weight
Fire Safety (Approved Document B, Req B5)	The applicant's own Transport Statement (para 4.7) confirms a 50-metre section of access track narrows to 3.1m — below the 3.7m minimum road width required by ADB Table 13.1 for a pumping appliance. The 3.1m standard applies only at gateway restrictions, not extended road sections. Turning area dimensions not verified against Table 13.1 (16.8m turning circle minimum). No hydrant proximity assessment submitted (ADB para 14.8).	Moderate to Significant Negative Weight

Issue	Assessment	Weight
Cumulative Impact & Precedent	West Sussex Fire & Rescue Service has not been shown to have accepted the sub-standard width. Granting permission would set a harmful precedent for further backland development on this and adjacent sites. It would be inconsistent with five directly comparable Council refusals: DM/21/1593 (backland dwelling, The Street, Bolney); DM/26/0317 (Glebelands Field, Bolney); DM/26/0111 (Old Mill House, Bolney); DM/22/3404 (Conservation Area harm, The Street, Bolney); DM/18/0953/4 (outside Bolney BUAB). On each ground the current application is materially comparable.	Moderate Negative Weight

18. Conclusion

For the reasons set out above, I urge Mid Sussex District Council to refuse this application. The proposal conflicts with the following policies of the adopted development plan:

Policy BOLH1 of the Bolney Neighbourhood Plan (Housing Mix)
Policy BOLH2 of the Bolney Neighbourhood Plan (Infill and Backland Development)
Policy BOLBB1 of the Bolney Neighbourhood Plan (Built-up Area Boundary)
Policy BOLE2 of the Bolney Neighbourhood Plan (Protect and Enhance the Countryside)
Policy BOLD1 of the Bolney Neighbourhood Plan (Design of New Development and Conservation)
Policy BOLT3 of the Bolney Neighbourhood Plan (Off-street Parking Provision)
Policy DP6 of the Mid Sussex District Plan (Settlement Hierarchy)
Policy DP12 of the Mid Sussex District Plan (Protection and Enhancement of Countryside)
Policy DP16 of the Mid Sussex District Plan (High Weald Area of Outstanding Natural Beauty)
Policy DP21 of the Mid Sussex District Plan (Transport)
Policy DP26 of the Mid Sussex District Plan (Character and Design)
Policy DP30 of the Mid Sussex District Plan (Housing Mix)
Policy DP34 of the Mid Sussex District Plan (Listed Buildings and Other Heritage Assets)
Policy DP35 of the Mid Sussex District Plan (Conservation Areas)
Policy DP38 of the Mid Sussex District Plan (Biodiversity)
Conservation of Habitats and Species Regulations 2017 (regulation 9) and the Environment Act 2021 (biodiversity net gain)
Building Regulations 2010, Schedule 1 Requirement B5 (fire service access)
WSCC Guidance on Parking at New Developments (September 2020)
WSCC Local Design Guide (v1.1, 2010)
Manual for Streets (DfT/DCLG, 2007)
NPPF (December 2024) paragraphs 44 (adequacy of information), 108–117 (transport and pedestrian safety), 180–182 and 193 (biodiversity), 189–191 (National Landscape), 213–215 (heritage assets)

For the reasons set out above, I ask the Council to refuse this application.

All factual matters set out above are stated to the best of my knowledge and belief.

I would be grateful if this letter could be placed on the planning file and taken into account when determining the application. Please confirm receipt by return.

Yours faithfully,

A solid black rectangular box used to redact the signature of the sender.