



TO: Planning Committee

BY: Head of Development and Building Control

DATE: 17 October 2023

DEVELOPMENT: Erection of a two-bed annexe building providing ancillary residential accommodation in place of a previously demolished annexe building (Retrospective).

SITE: Ebbsworth Cottage The Street Nutbourne Pulborough West Sussex RH20 2HE

WARD: Pulborough, Coldwaltham and Amberley

APPLICATION: DC/21/2802

APPLICANT: **Name:** Mr and Mrs F Cramer **Address:** Ebbsworth Cottage The Street Nutbourne Pulborough West Sussex RH20 2HE

REASON FOR INCLUSION ON THE AGENDA: By request of Pulborough Parish Council

RECOMMENDATION: To approve planning permission subject to appropriate conditions

1. THE PURPOSE OF THIS REPORT

- 1.1 To consider the planning application.

DESCRIPTION OF THE APPLICATION

- 1.2 Planning permission is sought for the erection of a two-bed annexe building providing ancillary residential accommodation located to the east side of the existing dwelling. The site previously benefited from an existing annexe which was left in a state of disrepair, and it has since been demolished. The works have ceased, and the application site remains with hardstanding foundation for the replacement building. The original annexe building had a gross internal floor area of approximately 69.5 square metres including a first-floor area over part of the living space. The new proposed annexe building is a single storey construction with an appropriate gross internal floor area of 68 square metres.

DESCRIPTION OF THE SITE

- 1.3 The application site relates to a grade II listed two-storey building located to the north of The Street, Nutbourne. The application site is located within a conservation area and is on a narrow section of the highway with no through route. The site is outside of a Built-Up Area Boundary and as such is considered to be located within a countryside location. The dwelling benefits from a garden curtilage extending to the west, north and east of the dwelling and the dwelling sits on the southern boundary with the highway.
- 1.4 Ebbsworth Cottage is a Grade II Listed Building sited immediately adjacent to the road. The building is described in the listing as a; *'Restored Grade II C17 or earlier timber-framed*

building with plaster infilling, ground floor and north end of the first floor rebuilt in stone rubble with red brick dressings and quoins. Thatched roof. Casement windows. One blocked original window with wooden mullions behind. Two storeys. Four windows'. The building is located to the north of The Street within Nutbourne.

2. INTRODUCTION

STATUTORY BACKGROUND

2.1 The Town and Country Planning Act 1990.

2.2 RELEVANT PLANNING POLICIES

The following Policies are considered to be relevant to the assessment of this application:

2.3 National Planning Policy Framework

2.4 Horsham District Planning Framework (HDPF 2015)

Policy 25- Strategic Policy: The Natural Environment and Landscape Character

Policy 26- Strategic Policy: Countryside Protection

Policy 28- Replacement Dwellings and House Extensions in the Countryside

Policy 31- Green Infrastructure and Biodiversity

Policy 32- Strategic Policy: The Quality of New Development

Policy 33- Development Principles

Policy 34- Cultural and Heritage Assets

2.5 RELEVANT NEIGHBOURHOOD PLAN

2.6 Independent examiner John Slater was commissioned to undertake the examination of the **Pulborough Neighbourhood Plan**. The examiner underwent unaccompanied site visits of the plan area on the 27 July 2021 and was issued all Reg 16 representations in full. The examiner produced a note of his Initial Comments and setting a deadline of the **25 August 2021 at 12pm** for responses. The Examiner published his final report on the 18 September 2021. The following polies are relevant in the case of this application:
Policy 15 - Design

2.7 Planning Advice Notes:

Facilitating Appropriate Development

Biodiversity and Green Infrastructure

PLANNING HISTORY AND RELEVANT APPLICATIONS

DC/20/1972	Erection of a detached double garage and a bin and log store.	Application Permitted on 27.01.2021
DC/19/2532	Erection of a single storey rear extension, external and internal alterations and replacement of roof covering with plain hand made clay tiles (Householder)	Application Permitted on 27.02.2020
DC/19/2533	Erection of a single storey rear extension, external and internal alterations and replacement of roof covering with plain hand made clay tiles (Listed Building Consent)	Application Permitted on 27.02.2020
DISC/20/0135	Approval of details reserved by conditions 3b and 3c to approved application DC/19/2533	Split Decision on 27.07.2020
DISC/20/0137	Approval of details reserved by conditions 3b (in respect of roof tiles) and 3c to approved application DC/19/2532	Split Decision on 27.07.2020

3. OUTCOME OF CONSULTATIONS

- 3.1 Where consultation responses have been summarised, it should be noted that Officers have had consideration of the full comments received, which are available to view on the public file at www.horsham.gov.uk

INTERNAL CONSULTATIONS

HDC Compliance: No Objection. Work had started on building an ancillary building without obtaining planning permission. A large concrete raft had been constructed. Following contact from Sean Rix (HDC Conservation Officer) an application has now been received for "*Erection of a two bedroom annexe providing ancillary residential accommodation to replace an annexe that has been demolished due to its dilapidated condition.*" DC/21/2802 refers.

HDC Conservation: No Objection. I am disappointed that there was no opportunity to consider reuse of the timber frame rather than demolition and replacement. Even if only a proportion of the historic timbers could have been reused. I have no objection to the erection of the replacement building. This will not harm the setting of the listed building. It will be beneficial in reinforcing the special interest of the cottage to rebuild the annexe with the same timber dimensions and framing design of the historic outbuilding. (suggested conditions attached)

OUTSIDE AGENCIES

Ecology Consultant: Recommended approval subject to attached conditions and subject to Natural England's formal comments on the conclusion of the Bat Appropriate Assessment.

Natural England: No Objection – Subject to appropriate mitigation being secured. Upon re-consultation of the updated Water Neutrality Statement no comments were received by Natural England. Based on the information provided, we advise that we are happy that the development will not result in adverse effect on The Mens SAC, however we would recommend that this is recorded within your authorities Appropriate Assessment for completeness.

PUBLIC CONSULTATIONS

- 3.2 **Pulborough Parish Council Comments:** The Parish Council issued an objection on 17.02.2022 to the application on the grounds of overdevelopment and requested the application to be referred to Horsham District Council planning committee. It is understood that there is no previous planning permission for the removal of the previously demolished building. Upon re-consultation the Parish Council reaffirmed its original objection of 17.02.22.
- 3.3 2 letters of representation have been received from 1 separate addresses supporting the application based on design, the neighbour states that they are familiar with the property for the last 25 years, which had been open for charitable garden events. The neighbour states that existing annexe was a habitable accommodation with a kitchen, living area and a store. No objection has been raised to the replacement of the existing annexe.

4. HOW THE PROPOSED COURSE OF ACTION WILL PROMOTE HUMAN RIGHTS AND EQUALITY

- 4.1 The application has been considered having regard to Article 1 of the First Protocol of the Human Rights Act 1998, which sets out a person's rights to the peaceful enjoyment of

property and Article 8 of the same Act, which sets out their rights in respect to private and family life and for the home. Officers consider that the proposal would not be contrary to the provisions of the above Articles.

- 4.2 The application has also been considered in accordance with Horsham District Council's public sector equality duty, which seeks to prevent unlawful discrimination, to promote equality of opportunity and to foster good relations between people in a diverse community, in accordance with Section 149 of the Equality Act 2010. In this case, the proposal is not anticipated to have any potential impact from an equality perspective.

5. HOW THE PROPOSAL WILL HELP TO REDUCE CRIME AND DISORDER

- 5.1 It is not considered that the development would be likely to have any significant impact on crime and disorder.

6. PLANNING ASSESSMENTS

Principle of Development

- 6.1 Policy 28 of the Horsham District Planning Framework (HDPF) seeks to ensure that any replacement dwellings, house extensions, outbuildings and ancillary accommodation are of an appropriate scale, siting, and design, and have due regard to the countryside setting and the existing dwelling.
- 6.2 The proposal relates to a part-retrospective planning application for the erection of a two-bed annexe building providing ancillary residential accommodation in place of a previously demolished annexe, serving Ebbsworth Cottage. The proposal seeks to rebuild the existing annexe using the same footprint, with a slight increase to the ground floor area. Whilst the proposal would increase accommodation, the annexe would remain in its pre-existing position, retaining a close physical relationship with the existing property, maintaining reliance on the main dwelling, as well as sharing access and parking and thus would not be considered as a separate dwelling. It is noted that a separate dwelling within the same location would be considered unacceptable owing to its location outside of the built-up area- however, given the proximity to the main dwelling and the continued use in association with, it is considered that in principle the annexe would remain connected to the main use of the dwelling, and that this can be adequately controlled by way of condition.

Character and Appearance

- 6.3 Policies 32 and 33 of the HDPF seek to ensure that development promotes a high standard and quality of design in order to enhance and protect locally distinctive characters. The policies also seek to ensure that the scale, massing and appearance of development relates sympathetically with the built surroundings, landscape, open spaces and routes within and adjoining the site, including any impact on the skyline and important views.
- 6.4 Policy 15 of the emerging Pulborough Neighbourhood Plan states that the scale, density, massing, height, landscape design, layout and materials of all development proposals, including alterations to existing buildings, will be required to reflect the architectural and historic character and scale of the surrounding buildings and landscape, as detailed in the Pulborough Design Statement and Nutbourne Design Statement. In particular, the effects of any proposed development should respect any conservation area within the parish.
- 6.5 Policy 34 of the Horsham District Planning Framework states that Development should reinforce the special character of the district's historic environment through appropriate

siting, scale, form, and design, and should make a positive contribution to the character and distinctiveness of the area. In addition, development should preserve and ensure clear legibility of locally distinctive vernacular building forms and their setting, features, fabric and materials, and should seek to secure the viable and sustainable use of heritage assets through continued preservation by uses that are consistent with the significance of the heritage asset.

- 6.6 As above, the application proposes a replacement annexe which would be contained in a building of a similar footprint to the pre-existing building, providing accommodation at ground floor level. The proposed annexe building would comprise a similar scale and form to that of the pre-existing structure which was demolished on the site. It is considered that the proposed works would be subservient to the host building and would not appear unduly prominent or intrusive in views from surrounding properties over and above the pre-existing arrangement. Save for minor changes to the roof and external design, no other external changes have been proposed and no fundamental alterations to the building in terms of form or appearance.
- 6.7 While the increase in accommodation on the site would be generous, the resulting building would be reflective of the scale of outbuilding found in the surrounding area. As a result, it is not considered that the resulting building would appear out of character in this location and the proposal would not be harmfully disproportionate to the pre-existing arrangement.
- 6.8 The scale and siting of the replacement annexe does not prevent an appreciation or understanding of the principal listed building. Its siting, and the resulting proximity between buildings is not considered to create an unacceptable impact on the cottage. It is recognised this replaces a previous outbuilding on the site, and with consideration of the above assessment, would therefore have a neutral impact on the setting of the listed building.
- 6.9 Following comments from the Council's Senior Conservation Officer, it would have been desired that there be a reuse of the timber frame rather than demolition and replacement, even if only a proportion of the historic timbers could have been reused. The applicant has confirmed that the materials were not salvageable from the existing annexe. Whilst the loss of previous materials is regrettable, the siting and scale of the replacement annexe would not harm the setting or character of the listed dwelling. Conditions are suggested below to ensure that the detailed architectural aspects of the replacement annexe are submitted to and approved in writing by the Local Planning Authority prior to the development commencing, as to ensure the special interest of the cottage to rebuild the annexe with the same timber dimensions and framing design of the historic outbuilding is reinforced.
- 6.10 The overall scale would be of an appropriate design and siting such that there would be no adverse visual impact over and above the pre-existing arrangement, and would accord with the above policies. Furthermore, the proposals would not have a detrimental impact on the surrounding area or the adjoining properties in terms of its character and design, nor result in harm to the character and special interest of the host listed dwelling. The proposed works are therefore considered to be acceptable in this regard, subject to an appropriate condition in relation to specific materials to be used for the proposed development.

Impact on Neighbouring Amenity

- 6.11 Policy 33(2) of the HDPF states that permission will be granted for development that does not cause unacceptable harm to the amenity of the occupiers/users of nearby properties and land.
- 6.12 It is considered that the siting and layout of the proposed annexe and the resulting relationship with the nearest adjoining property Short's Farm would be sufficient to prevent any unacceptable harm to neighbouring amenity. Short's Farm is located to the north-west and is set at an acceptable distance from the proposed site. It is noted that the existing boundary treatment to the east where the annexe is located has mature vegetation and no visible views from neighbouring boundaries. The provision of additional ancillary accommodation would not be expected to result in significant potential for harmful levels of noise or disturbance, and no adverse impact in these regards would be expected.

Water Neutrality

- 6.13 The application site falls within the Sussex North Water Supply Zone as defined by Natural England which draws its water supply from groundwater abstraction at Hardham. Natural England has issued a Position Statement for applications within the Sussex North Water Supply Zone which states that it cannot be concluded with the required degree of certainty that new development in this zone would not have an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar sites.
- 6.14 Natural England advises that plans and projects affecting sites where an existing adverse effect is known will be required to demonstrate, with sufficient certainty that they will not contribute further to an existing adverse effect. The received advice note advises that the matter of water neutrality should be addressed in assessments to agree and ensure that water use is offset for all new developments within the Sussex North Water Supply Zone.
- 6.15 The proposal falls within the Sussex North Water Supply Zone and would result in a greater level of water abstraction than the site presently generates. Natural England therefore require that the proposal demonstrates water neutrality or that it should be delayed awaiting an area-wide water neutrality strategy. Detached annexes are generally considered capable of self-contained occupancy supplemental to the main dwelling and therefore will be assessed in the same manner as a new dwelling in terms of occupancy rates and water consumption. There is a likelihood the detached annexe would result in an increased occupation given the nature of accommodation proposed and as such the application cannot be screened out due to impact.
- 6.16 The pre-existing annexe comprised of a total Gross Internal Area (GIA) of 69.5m² with most of the internal area on the ground floor and a modest first floor area. The proposed Annex will comprise of a single storey structure of 68m². The pre-existing building contained one bedroom and a bathroom with a bath, w.c. & wash hand basin and a small kitchenette with a sink. Based on the Horsham District census data, a one-bedroom unit has an occupancy of 1.32. The proposed annex comprises of 2no. bedrooms and a shower room with shower, w.c. & wash hand basin. Based on the Horsham District census data, a two-bedroom unit has an occupancy of 1.88. Due to the likely increased occupancy numbers, there will therefore be an increase in water usage.
- 6.17 The existing baseline water usage is accepted as 0l/d. Based on the worse case flow rates for the fixtures and fittings a proposed water usage of 84.8 l/p/d has been calculated within the Part G Calculation. To determine the water usage per day the calculated 84.8 l/p/d is multiplied by 1.88 average occupancy, which equals 159.42 l/d. The proposed annex does not include a kitchen, as the kitchen facilities within the main house will be utilised as part of the annex.

- 6.18 As the proposed use would incorporate an increased water demand, the water strategy proposes to retrofit the annexe and existing property with efficient fixtures and fittings; water reuse with rainwater harvesting system which is considered acceptable and as such the water strategy is sufficiently detailed in this regard. The proposed efficiencies would reduce the overall water demand on the site by 115.62l/d, thus offsetting the proposed increase in demand resulting from the proposal.
- 6.19 Appropriate mitigation measures have been embedded within the development and would be secured by condition as part of the planning consent (detailed below). These measures are considered sufficient to avoid adverse effects on the integrity of the interest features of the Arun Valley SPA, SAC & Ramsar site from the development either alone or in combination with other plans and projects, in accordance with Policy 31 of the Horsham District Planning Framework (2015), Paragraphs 179 and 180 of the National Planning Policy Framework (2021), its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).

Ecology

- 6.20 Policy 31(2) of the HDPF states that development proposals will be required to contribute to the enhancement of existing biodiversity and should create and manage new habitats where appropriate. The Council will support new development which retains and/or enhances significant features of nature conservation on development sites. The Council will also support development which makes a positive contribution to biodiversity through the creation of green spaces, and linkages between habitats to create local and regional ecological networks.
- 6.21 The application was accompanied with an ecological assessment report. The site lies within the 6.5 km Key Conservation Area of The Mens Special Area of Conservation (SAC) and the 12 km Wider Conservation Area of Ebernoe Common SAC (Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol). One of the qualifying features for the SACs is Barbastelle bats, but this species has not been recorded within 2.00 km of the site area (Ecological Impact Assessment (Lizard Landscape Design and Ecology, November 2022)).
- 6.22 The new development will be constructed on the existing concrete hardstanding and the line of trees along the eastern boundary of the site will be retained, together with all surrounding trees and shrubs (Ecological Impact Assessment (Lizard Landscape Design and Ecology, November 2022)). Therefore, there will be no severance to the flight lines of foraging or commuting bats from the SACs. Ecology advises that there will therefore be no Likely Significant Effect on the SACs and has recommend that Preliminary Roost Assessments for bats should be undertaken on any trees which may be scheduled to be removed from the site in the future.
- 6.23 In addition, although the pond is isolated from the construction area, the site could support Great Crested Newt (GCN) during their terrestrial phase in the modified grassland and tall ruderal habitats and, in addition, there is a record of GCN within 2.00 km of the site (Ecological Impact Assessment (Lizard Landscape Design and Ecology, November 2022)). It has therefore been recommended that a GCN method statement should be secured by a condition of any consent for discharge prior to commencement of any works which will impact the breeding / resting place of GCN.
- 6.24 Based on the information provided Natural England are satisfied that the development will not result in adverse effect on the Mens SAC. Ecology is satisfied that there is sufficient ecological information available for determination.

Conclusion

- 6.25 The proposed annexe is a replacement for an existing annexe and would be viewed within this context. Whilst the level of accommodation would be increased, the annexe would remain in its previous position and would retain a close physical relationship with the existing property. It would also maintain reliance on the main dwelling, as well as sharing access and parking. It is noted that the existing boundary treatment to the east where the annexe is located has mature vegetation and no visible views from neighbouring boundaries. The provision of additional ancillary accommodation would not be expected to result in significant potential for harmful levels of noise or disturbance, and no adverse impact in these regards would be expected. As such the proposal is considered to comply with relevant local and national planning policies and is therefore recommended for approval.

7. RECOMMENDATIONS

- 7.1 The application is therefore recommended for approval, subject to conditions as listed below.

Conditions:

- 2 **Standard Time Condition:** The development hereby permitted shall begin before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990.

- 3 **Pre-commencement Condition:** No relevant works shall commence until the following details have been submitted to and approved in writing by the Local Planning Authority. The works must not be executed other than in complete accordance with these approved details:

- a) Specification, including elevational drawings of timber frame construction to replicate the form of the demolished historic timber frame.
- b) Samples or specifications of external materials and surface finishes.

Reason: As this matter is fundamental to ensure that the significance of the designated heritage asset, and the character, appearance and integrity of the building, is not prejudiced, thereby preserving the special architectural or historic interest which it possesses, and to comply with Policy 34 of the Horsham District Planning Framework (2015).

- 4 **Pre-commencement Condition:** Prior to any further works being undertaken on the site, a Great Crested newt Method Statement shall be submitted to and approved in writing by the local planning authority. This will contain precautionary mitigation measures and/or works to avoid potential impacts to Great Crested Newt bats during demolition and construction phases. The measures and/works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter.

Reason: To conserve protected and Priority species and allow the Local Planning Authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species).

- 5 **Pre-commencement (Slab Level) Condition:** No development above ground floor slab level shall commence until full details of the water efficiency measures and

rainwater/greywater harvesting system required by the approved water neutrality strategy (Water Neutrality Statement 3 received 09.08.2023 have been submitted to and approved in writing by the Local Planning Authority. The rainwater harvesting system shall include suitable storage tanks to provide a minimum 35 days storage capacity.

Reason: To ensure the development is water neutral to avoid an adverse impact on the Arun Valley SACSPA and Ramsar sites in accordance with Policy 31 of the Horsham District Planning Framework (2015), Paragraphs 179 and 180 of the National Planning Policy Framework (2021), and to allow the Local Planning Authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).

- 6 **Pre-commencement (Slab Level) Condition:** A Biodiversity Enhancement Layout, providing the finalised details and locations of the enhancement measures contained within the Ecological Impact Assessment (Lizard Landscape Design and Ecology, November 2022) shall be submitted to and approved in writing by the local planning authority. The enhancement measures shall be implemented in accordance with the approved details prior to occupation and all features shall be retained in that manner thereafter.

Reason: To enhance Protected and Priority Species and allow the Local Planning Authority to discharge its duties under the s40 of the NERC Act 2006 (Priority habitats & species).

- 7 **Pre-occupation Condition:** The development hereby permitted shall be undertaken in full accordance with the water neutrality strategy (Water Neutrality Statement received 09.08.2023 No development hereby permitted shall be first occupied until evidence has been submitted to and been approved in writing by the Local Planning Authority that the approved water neutrality strategy for that dwelling has been implemented in full. The evidence shall include the specification of fittings and appliances used, evidence of their installation, and completion of the as built Part G water calculator or equivalent. The installed measures shall be retained as such thereafter.

Reason: To ensure the development is water neutral to avoid an adverse impact on the Arun Valley SACSPA and Ramsar sites in the imposition of the following conditions: accordance with Policy 31 of the Horsham District Planning Framework (2015), Paragraphs 179 and 180 of the National Planning Policy Framework (2021), and to allow the Local Planning Authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), and s40 of the NERC Act 2006 (Priority habitats & species).

- 8 **Pre-occupation Condition:** Prior to the occupation of the annexe commencing, all mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Ecological Impact Assessment (Lizard Landscape Design and Ecology, November 2022) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination. This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details.

Reason: To conserve and enhance protected and Priority species and allow the Local Planning Authority to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species) and Policy 31 of the Horsham Development Framework.

- 9 **Regulatory Condition:** The new roof junctions at ridge, eaves and verges shall be built to reflect traditional detailing including exposed rafter feet, cut verges, and hogs back or half round ridge tiles.

Reason: To ensure that the significance of the designated heritage asset, and the character, appearance and integrity of the building, is not prejudiced, thereby preserving the special architectural or historic interest which it possesses, and to comply with Policy 34 of the Horsham District Planning Framework (2015).

- 10 **Regulatory Condition:** The new windows fitted in the building hereby permitted shall have timber casements flush fitted with their frames.

Reason: To ensure that the significance of the designated heritage asset, and the character, appearance and integrity of the building, is not prejudiced, thereby preserving the special architectural or historic interest which it possesses, and to comply with Policy 34 of the Horsham District Planning Framework (2015).

- 11 **Regulatory Condition:** Any roof lights fitted shall be metal framed and sit flush with the roof slope.

Reason: To ensure that the significance of the designated heritage asset, and the character, appearance and integrity of the building, is not prejudiced, thereby preserving the special architectural or historic interest which it possesses, and to comply with Policy 34 of the Horsham District Planning Framework (2015).

- 12 **Regulatory Condition:** All new and replacement rainwater goods shall be cast iron or cast aluminium or cast effect plastic.

Reason: To ensure that the significance of the designated heritage asset, and the character, appearance and integrity of the building, is not prejudiced, thereby preserving the special architectural or historic interest which it possesses, and to comply with Policy 34 of the Horsham District Planning Framework (2015).

- 13 **Regulatory Condition:** The annexe hereby permitted shall be used solely for purposes incidental to the occupation and enjoyment of Ebbsworth Cottage, The Street, Nutbourne, Pulborough (as identified on the approved plans), and shall not be used as a separate unit of accommodation, as habitable living accommodation, for any commercial purposes or for any other purpose(s)/use(s).

Reason: The establishment of an additional independent unit of accommodation, additional living accommodation, commercial use or any other use(s) would give rise to an over-intensive use of the site and lead to an unsatisfactory relationship between independent units of living accommodation contrary to Policies 26 and 33 of the Horsham District Planning Framework (2015).